



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety Administration**

901 Locust Street, Suite 480  
Kansas City, MO 64106

## **WARNING LETTER**

**VIA ELECTRONIC MAIL TO:** [smyon@marathonpetroleum.com](mailto:smyon@marathonpetroleum.com), [jchunt@mplx.com](mailto:jchunt@mplx.com) and [mlbailey@marathonpetroleum.com](mailto:mlbailey@marathonpetroleum.com)

October 7, 2021

Shawn M. Lyon  
President  
Marathon Pipe Line LLC  
539 South Main Street  
Findlay, OH 45840

**CPF 3-2021-047-WL**

Dear Mr. Lyon:

From April 29, 2020, through November 12, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected procedures, facilities, and records relevant to your Marathon Pipe Line LLC (MPL) products system in Illinois, Michigan, Indiana and Ohio.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. § 195.428 Overpressure safety devices and overfill protection systems

**(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.**

The annual inspections performed in 2017 and 2018 on the relief device TPRV-3-5 (on Lima Tank 20-3) could not verify that the relief device was functioning properly, in good mechanical condition, and was adequate from the standpoint of capacity and reliability of operation for the service in which it was used.

The testing of the relief device TPRV-3-5 (on Lima Tank 20-3) on August 13, 2017 was not completed as indicated in the email response provided to PHMSA on December 01, 2020. The next annual DOT inspection was scheduled for October 04, 2018 but still was not completed. No further DOT testing was performed in 2018. Relief device TPRV-3-5 passed the annual DOT inspection conducted on September 11, 2019.

2. § 195.428 Overpressure safety devices and overfill protection systems

**(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.**

The inspections of the Lima Maumee Relief 01 RV1 located on the Harpster-Lima system and the HVL relief valve RV1 (V78) located on the Robinson-Lima system were inadequate to demonstrate that the relief valves are functioning properly in 2020 as intended since the “as left” setpoints of the relief devices were set incorrectly and the “pressure relief” setpoints were misinterpreted.

The review of the inspection records indicates that the “calculated as left nitrogen setpoint” for the Lima Maumee Relief 01 RV1 was miscalculated by the technician who performed the first testing on June 16, 2020 and the re-testing on July 27, 2020 following PHMSA’s inquiry. Although the

miscalculated as left setpoint values from both tests were lower than the actual pressure relief setpoint, the pressure relief setpoint value was not properly identified nor used in the determination of the as left setpoints above.

On the Robinson Lima HVL relief valve RV1 (V78), the review of the inspection records indicated that the “calculated as left nitrogen setpoint” was miscalculated by another technician who performed the testing on June 23, 2020. Although the miscalculated as left setpoint value from the test was lower than the actual pressure relief setpoint, the pressure relief setpoint value was not properly identified nor used in the determination of the as left setpoint above.

After conducting an operator qualification evaluation, it was determined that the two technicians, who performed the above inspections, needed to be re-qualified on the task which occurred on October 21, 2020. Also, MPL revised its inspection form to prevent confusion with the pressure relief set-point.

**3. §195.573 What must I do to monitor external corrosion control?**

**(a)....**

**(c) Rectifiers and other devices. You must electrically check for proper performance each device in the first column at the frequency stated in the second column.**

Device	Check frequency
Other interference bond	At least once each calendar year, but with intervals not exceeding 15 months.

Non-critical bonds located on the Wabash and Robinson - Lima 10" Products systems were not electrically checked each calendar year, but with intervals not exceeding 15 months for proper performance.

Specifically, four non-critical bonds on the Wabash system and one non-critical bond on the Robinson - Lima 10" Products system were not inspected in 2018 at the following locations:

- (WAB 12" ROBINSON ANAPOLIS BV'S 0+07 - 664+21 WAB-20-RM-A & MPs 9+29 /19+82 / 25+12 / 33+91)
- (ROL 10" WABASH STATION - ANAPOLIS BV'S 0+01-664+331, ROL-01-RN-A & MP 9+85)

MPL indicated that the above bonds were not checked due to the lack of facility access. However, missed checks (exceptions) of non-critical interference bonds should have been tracked and addressed in a manner that complies with the regulatory requirement of § 195.573(c).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Marathon Pipe Line LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2021-047-WL**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

Gregory A. Ochs  
Director, Central Region, Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration

cc: John Hunt, Vice President Operations, [jhunt@mplx.com](mailto:jhunt@mplx.com),  
Mandy L Bailey, Regulatory Compliance Coordinator, [mlbailey@marathonpetroleum.com](mailto:mlbailey@marathonpetroleum.com)