



**PORTLAND PIPE LINE CORPORATION**  
Safety, Environment, Customer, Community

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August 11, 2016

Mr. Byron Coy, Jr. P.E.  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
Eastern Region, Suite 306  
820 Bear Tavern Road  
W. Trenton NJ 08628

Subject: Notice of Amendment, CPF 1-2016-5005M, dated July 11, 2016  
Submission of Written Responses and Request for Hearing

Dear Mr. Coy:

The purpose of this letter and the accompanying document is to provide written responses to the Pipeline and Hazardous Materials Safety Administration (PHMSA) to the above referenced Notice of Amendment (NOA). PHMSA issued the NOA pursuant to its July 14 through July 16, 2015 inspection of Portland Pipe Line Corporation's (PPLC's) facilities. The NOA as issued to PPLC by PHMSA was dated July 11, 2016 and was received by PPLC on July 12, 2016. Accordingly, this response is timely.

Following the July 2015 inspection and the July 2016 NOA, PPLC has developed revisions to its procedures in its Operations and Maintenance (O&M) Manual. The attachment to this letter provides a table correlating each of the three NOA items to the corresponding revised O&M Manual sections, and includes the language of the relevant revised sections for reference. PPLC intends to implement the revisions through a Management of Change (MOC) process in accordance with PPLC's safety managing system (SMS), once PHMSA has had the opportunity to determine the revisions to be satisfactory to resolve the NOA.

We believe that all three of the items raised by the NOA are addressed by our responses and O&M Manual revisions provided in the attached document, and that all three items can be resolved informally without resort to a hearing. However, if in its judgment PHMSA determines that our responses and planned actions do not resolve all the items referenced in the NOA, we respectfully reserve our right to, and hereby request, a hearing on any items left unresolved. If in its judgment PHMSA determines that our response and planned action for an item have resolved the item, then we will withdraw the respective request for hearing.

If you have any questions about the response to the NOA or this request for hearing, or about this matter generally, please do not hesitate to contact Ken Brown, PPLC Engineering Manager, at (207) 767-0449.

Sincerely,

Thomas A. Hardison

Enclosure

cc: J.C. Gillies, N.D. Payeur, K.P. Brown, File EG 174

2016-08-11 10:00 AM NOA CPF 1-2016-5005M.docx