



An Ergon Company

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July 5, 2018

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration, Eastern Division
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
Attn: Robert Burrough, Director

**Re: Ergon Terminaling, Inc.
Notice of Probable Violation
CPF 1-2018-5006**

Dear Mr. Burrough:

Attached are the documents Ergon Terminaling, Inc. (ETI) was asked to provide following our June 6 meeting.

A. Revised Pipeline P&ID showing PHMSA jurisdiction and pressure relief devices (Attachment A)

As shown on the P&ID, PHMSA jurisdiction begins at the point where product flows through the facility Coriolis Meter (FE 0140) and ends at the receiver located at our Ergon – West Virginia refinery.

The original NPV identified nine pressure relief devices associated with the Magnolia Pipeline.

The attached P&ID illustrates that only three pressure relief devices are found on the ETI Magnolia Pipeline.

These include PSV 0296, PS 0135, and PIT 0294.

One device (PSV 0296) is a thermal relief valve located on the pig trap. The other two (PIT 0294) and (PS 0135) are components of a single pressure relief system.

PIT 0294 is programmed to trigger pressure sensor PS 0135 to shut down the line in the event that operating pressure exceeds the predetermined safe operating limit.

B. Documentation of pressure relief devices (Attachment B)

As shown in the attached documentation, the pressure relief devices were operating properly during actual pressure relief events.

C. Documentation of facility plan reviews (Attachment C)

Ergon, Inc. uses an online task tracking system to help monitor and track compliance tasks for each Ergon, Inc. facility.

The attached is a report from our compliance task tracking system. This report shows that the facility plans were reviewed in November 2013 and November 2014.

D. Provide a copy of 2013 Cathodic Protection Survey (Attachment D)

As discussed in our June 6 meeting, ETI was able to locate a copy of the 2013 cathodic protection survey performed by Michael Maddux Pipeline Corrosion Consultant.

Although not a complete survey (due to facility construction), components checked were operating properly.

E. Summary of 2012, 2015 – 2017 Cathodic Protection Survey findings (Attachment E)

Attached is a summary of the 2012, 2015 – 2017 cathodic protection survey findings. This spreadsheet shows that there were no risks associated with the pipeline during the period 2013 – 2014.

F. Updated Operations Manual Section 3.13 Firefighting Equipment (Attachment F)

As discussed in our June 6 meeting, ETI – Magnolia has updated Section 3.13 Firefighting Equipment of the facility O&M manual to reflect past and current practices regarding firefighting equipment.

Additionally from our meeting, you will remember that Section 3.13 of the O&M manual applies to a single fire extinguisher associated with our pipeline.

It is our understanding that PHMSA will take the provided information into consideration and provide ETI with a recalculation of the proposed penalty assessment.

Please let me know if you have any questions or require additional information.

Sincerely,

Ergon Terminals, Inc.



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