

RECEIVED APR 23 2018



MIPC, LLC
920 Cherry Tree Rd
Aston, PA 19014

A handwritten signature in blue ink, appearing to be "MJC", is located in the upper right corner of the page.

April 20, 2018

Mr. Robert Burrough
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
820 Bear Tavern Road, STE 130
West Trenton, NJ 08628

RE: CPF 1-2018-5011W

Mr. Burrough,

This letter is in response to your Warning Letter dated March 26, 2018, and received by MIPC, LLC (MIPC).

On the basis of the May 2017 inspection, PHMSA identified items within MIPC's plans and procedures, as described below. MIPC's responses to the noted warning items are as follows.

PHMSA Concern:

Item 1 – § 195.402 Procedural manual for operations, maintenance, and emergencies.

“(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to ensure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

MIPC failed to review and update its operations and maintenance manuals at intervals not exceeding 15 months, but at least once each calendar year.”

MIPC Response:

MIPC has updated the SharePoint (company intranet) page where MIPC's manuals are posted and added a column to track review due dates. In addition, MIPC is evaluating our computerized maintenance management system (Maximo) to track manual review dates.

PHMSA Concern:

Item 2 – § 195.446 Control room management.

“(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...”

MIPC failed to follow its written control room management procedure, Appendix I, Exhibit A - Alarm Philosophy Control Center, Section 6.2 (Procedure), developed in accordance with § 195.446(j)(1).

MIPC’s Section 6.2 of the Procedure Alarm Philosophy Control Centers, states:

‘The alarm history (e.g., annunciations, acknowledgements, return-to-normal, controller actions, etc.) should be preserved for 3 years per DOT requirement.’

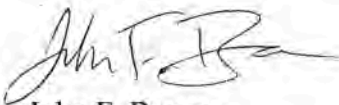
During the inspection, the PHMSA inspector requested a report of recent alarm history. MIPC was unable to provide a report at the time of inspection.”

MIPC Response:

MIPC records indicate an alarm history report was provided during the May 2017 inspection. Nonetheless, MIPC is currently evaluating options to enhance its existing Alarm Management System to capture additional data.

MIPC is committed to operating our terminal and pipeline system safely and in compliance with all applicable regulations. If you have further questions, please feel free to contact me at 484-816-3303.

Sincerely,



John F. Bowen
Pipeline Safety Lead
MIPC, LLC