



Toledo Refining Company LLC  
1819 Woodville Road  
Oregon, OH 43616-3159  
419.698.6600

March 08, 2018

**Via Certified Mail - Return Receipt Requested**

Mr. Robert Burrough  
Director, PHMSA Eastern Region  
Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628

**Re: Toledo Refining Company LLC – Warning Letter CPF 1-2018-5013W**

Dear Mr. Burrough:

On March 4, 2018 Toledo Refining Company, LLC (TRC) received a “Warning Letter” dated March 2, 2018, resulting from a PHMSA inspection performed on its pipeline system from June 5-9, 2017. While the Warning Letter did not require a response, TRC is providing this letter to document the steps taken to facilitate the completion of actions to address the two probable violations identified in the Warning Letter. Consequently, by submitting this response, TRC does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

TRC prides itself on being a responsible operator and strives to be in compliance with all appropriate regulations in order to be a safe and responsible transporter of petroleum products. PBF appreciates the benefit of PHMSA inspections and hopes the results of this inspection and the actions taken to address these two issues is a reflection of our commitment for continuous improvement.

If you have questions about the response to the Warning Letter or about these matters in general, please do not hesitate to contact me at (419) 697-6445 or [david.ellis@pbfenergy.com](mailto:david.ellis@pbfenergy.com). Thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "David Ellis". The signature is written in a cursive style with a large initial "D".

David Ellis  
DOT, Logistics & Compliance  
Toledo Refining Company, LLC

CC: H. Cartaya; T. McLane; P. Kennedy; T. Slosson; D. Hollbrook

**Toledo Refining Company LLC – DOT General Audit  
Warning Letter  
CPF 1-2018-5013W**

**1. § 195.567 Which pipelines must have test leads and what must I do to install and maintain the leads.**

**(c) Maintenance.** You must maintain the test lead wires in a condition that enables you to obtain electrical measurements to determine whether Cathodic protection complies with §195.571.

*TRC failed to maintain test lead wires in a condition that enables them to obtain electrical measurements to determine whether cathodic protection complies with §195.571.*

*During field observations conducted as part of the inspection, the PHMSA Inspector noted that electrical contact with the pipeline could not be made at a test station located just north of Navarre Ave. As a result, pipe-to-soil potential voltages could not be obtained.*

*This test station was in an area of potential stray currents from overhead transmission lines and a railroad.*

**TRC Response:** TRC does not challenge that there was a damaged test station (86DD). Though TS-86DD was damaged, the integrity of the pipeline's cathodic protection system was, at no time, at risk because of it. TRC relies on TS-8DE and TS-86DC to ensure this. These two test stations are located upstream and downstream from the damaged test station. They are located in the same environment as TS-86DD, i.e., parallel to the railroad and adjacent to the high power lines. These additional test stations ensure that there is no new risk to the public because of the damaged leads at TS-86DD. TRC is scheduled execute and complete the repair/mitigation to the damaged leads at TS-86DD during 2Q18.

**2. § 195.589 What corrosion control information do I have to maintain?**

- (a) You must maintain current records or maps to show the location of –**
- (1) Cathodically protected pipelines;**
  - (2) Cathodic protection facilities, including galvanic anodes, installed after January 28, 2002; and**
  - (3) Neighboring structures bonded to cathodic protection systems.**

*TRC failed to maintain current records or maps to show the location of cathodic protection facilities required by § 195.589(a).*

*During the inspection, the PHMSA inspector requested and reviewed existing maps of the pipeline system. The maps provided did not clearly and accurately depict current cathodic protection information such as test stations, rectifiers, anode beds, bonded systems, and cathodic protection systems for the breakout tanks.*

**TRC Response:** TRC acknowledges that at the time of the DOT General Audit, they were unable to produce the requested map. TRC did, however, produce records showing that the CP systems for the breakout tanks were in place, functioning properly and regularly tested. TRC has engaged an Engineering Firm to generate updated maps for both the breakout tanks and pipeline system. Completion is expected 2Q18.