

## NOTICE OF AMENDMENT

### OVERNIGHT EXPRESS DELIVERY

September 13, 2018

Mr. Thomas Hardison  
President  
Portland Pipe Line Corporation  
30 Hill Street  
South Portland, ME 04106

**CPF 1-2018-5028M**

Dear Mr. Hardison:

From August 6-10, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code, inspected Portland Pipe Line Corporation's (Portland) procedures for operations and maintenance in South Portland, ME.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Portland's plans or procedures, as described below:

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

**(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

...

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

Portland's written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies for each pipeline system were inadequate. Specifically, Portland's procedures failed to include sufficient guidance for corrosion control supervisors to maintain thorough knowledge of that portion of the corrosion control procedures for which they are responsible, per the requirements of § 195.555.

Section 195.555 states:

“You must require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under §195.402(c)(3) for which they are responsible for insuring compliance.”

During the inspection, the PHMSA inspector reviewed Portland’s Operations and Maintenance Procedures Section 6.5.2.4- Mainlines, dated 08-2018 (Procedure). The Procedure states, “The Corrosion Specialist gathers the data required to technically administer the corrosion mitigation program...”

The Procedure did not include adequate details on the following:

- Defining the corrosion control supervisor role
- Corrosion control supervisor training
- Corrosion control supervisor knowledge verification
- Corrosion control training documentation

During the inspection, the PHMSA inspector asked Portland where the applicable information was documented. Portland stated, corrosion control supervisors are NACE level 2 certified and the records are documented on the job responsibility statements. However, these records are not required or incorporated into Portland’s Procedure.

Therefore, Portland failed to include a process in its corrosion control procedures to require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures for which they are responsible, per the requirements of § 195.555.

**2. § 195.402 Procedural manual for operations, maintenance, and emergencies.**

**(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

...

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

Portland’s written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies were inadequate. Specifically, Portland’s procedures for atmospheric corrosion monitoring were inadequate as they lack sufficient details for inspecting each pipeline or portion of pipeline exposed to the atmosphere as required by § 195.583.

During the inspection, the PHMSA inspector reviewed Portland’s Operations and Maintenance Procedures Section 6.5.4.1.1, dated 08/2018 (Procedure) and Prevention of Atmospheric Corrosion form (Record).

The Procedure stated, “The adequacy of the corrosion control measures for the pipeline is determined in accordance with the procedures in Section 6.5.4.1.1.a of this manual.

Documentation of the inspection of the pipeline will include recording the condition of the pipeline coating and pipeline surface, any repairs required for the coating, and expected timing for coating repairs. If the pipeline coating is intact and the pipeline surface does not have indications of atmospheric corrosion the inspection documentation will note no corrosion and no repairs needed.”

The Procedure and associated Record form did not include adequate details related to atmospheric corrosion monitoring, including, but not limited to, the following:

- How pipe is inspected for atmospheric corrosion at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water
- An atmospheric corrosion grading scale or established criteria for inspection
- How significant atmospheric corrosion is evaluated for remaining strength of pipe
- What documentation is required on the associated Record, including where to record the coating and/or corrosion conditions or grades

During the inspection, the PHMSA inspector asked Portland where the applicable information was documented. Portland stated, there is no grading requirement or scale per Procedure and any atmospheric corrosion deficiencies are noted in the comments section of the form (Record). However, the Procedures do not require any documentation of these results.

Therefore, Portland failed to prepare adequate atmospheric corrosion monitoring procedures, per the requirements of § 195.402(c)(3).

#### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **30** days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Portland Pipe Line Corporation maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1- 2018-5028M** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to [robert.burrough@dot.gov](mailto:robert.burrough@dot.gov). Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*