



PORTLAND PIPE LINE CORPORATION
Safety, Environment, Customer, Community

THOMAS A. HARDISON
PRESIDENT

TELEPHONE
(207) 767-0440

FACSIMILE
(207) 767-0442

E-MAIL
TOM.HARDISON@PMPL.COM

October 12, 2018

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Eastern Region, Office of Pipeline Safety
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Subject: Notice of Amendment, CPF 1-2018-5028M, dated September 13, 2018
Submission of Written Responses and Request for Hearing

Dear Mr. Burrough:

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 August 6 through August 10, 2018 inspection of Portland Pipe Line Corporation's (PPLC's) facilities. The NOA as issued to PPLC by PHMSA was dated September 13, 2018 and was received by PPLC on September 14, 2018. Accordingly, this response is timely.

Following the August 2018 inspection and the September 2018 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 two 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 both of the items raised by the NOA are addressed by our responses and O&M Manual revisions provided in the attached document, and that both of the items can be resolved informally without resorting to a hearing. However, if in its judgment PHMSA determines that our responses and planned actions do not resolve both of 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

2018-10-12 ltr NOA CPF 1-2018-5028M.docx