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MarkWest has received the notice of amendment (NOA) and will make the following changes and adaptations to our current operating standards. The following updated procedures attached in the email will address the inadequate procedures mention in **CPF 1-2020-006-NOA**.

1. MarkWest acknowledges that details on how each valve is protected from unauthorized operation and vandalism according to 195.420(c) may have been perceived as inadequate. The following clarification has been made:

“MarkWest will provide protection for each valve from unauthorized operation and vandalism with the primary source being a chain link fence with barbed wire around the top. In the event that material such as fencing is not probable, locking devices, and/or restrictive material such as, but not limited to cable, chain, and padlocks may be used to secure the site from unauthorized operation and vandalism.”

Please see attached files for the full PDF ([Section 2- Valve Inspection and Testing](#)) version of this excerpt. This clarification has been updated and implemented to ensure the safety of all NEBU MarkWest facilities.

2. MarkWest acknowledges how the atmospheric procedure failed to include details on how inspections and evaluations are done on pipe exposed to the atmosphere in accordance with 195.583. The additional guidance that was given to the inspector included the Training Guide that addressed how all MarkWest personnel performing this covered task were trained and Operator Qualified to CFR and company standards to perform atmospheric corrosion inspections. Employees are not able to perform this task without proper knowledge skill and ability which is demonstrated during the OQ evaluation. The OQ training guide can be provided at PHMSA’s request. However, MarkWest has addressed the agencies concern and made the following adaptation to remove any confusion on what is expected of personnel during an Atmospheric Corrosion Inspection:

Please see attached files for the full PDF ([Section 2- Corrosion Control- Atmospheric Corrosion](#)) & ([Form 104- Atmospheric Corrosion Form](#)) version of this excerpt. This clarification has been updated and implemented to ensure the safety of all MarkWest facilities.

3. MarkWest acknowledges how the concerns with the lack of details regarding maps and records according to 195.404(a)(1), and the following updates to the procedure has been made to address the concern and clearly define the locations of Maps and Records:

“For record retention time frames and what must be maintained, please refer to [Appendix: R – Records Retention](#) which outlines all of the requirements of 195.404.

***Pipeline Maps and Records** will be stored on MarkWest SharePoint and/or on the local network drive. To access the company GIS database with MARS (MarkWest Assets Records & Storage) please visit: <https://gisgeocor.mgrounnet.com/MarkWestViewer/index.html?viewer=Assets.AssetsViewer#>*

*Once logged into the GIS system, checkboxes can be applied under the “**layers**” tabs to turn on features including but not limited to valves, rectifiers, pump stations, and pipeline construction specifications.*

*Within the GIS system viewer click on the “**Tools**” tab and select “**MARS Search**” to review records such as patrols, inspections, and testing.”*

Please see attached files for the full PDF ([Section 2- Records](#)) version of this excerpt. This clarification has been updated and implemented to ensure the safety of all MarkWest facilities.

4. MarkWest acknowledges that procedures did not provide sufficient details on how to remediate corrosion control deficiencies according to 195.573(e). The following revision has been made and implemented in order to ensure compliance:

***“Identified Deficiencies** – may include but are not limited to, low or high potentials, rectifiers, atmospheric corrosion, damaged, broken test stations, isolation, coating, or any other external corrosion affecting problems... etc. not meeting CP criteria in 192 - Subpart I or 195 – Subpart H, must be investigated and documented on a [Form 118- Remedial Action Plan](#). MarkWest will make all efforts to correct the identified deficiency prior to the next scheduled inspection, although there may be situations in which we would exceed that frequency. Repairs will be prioritized to ensure safe operation.*

If the condition presents an immediate hazard to persons or property, the pipeline must be shut down until the affected part of the system has been corrected and the pipeline can operate safely.

In the process of mitigating external corrosion deficiencies, each circumstance may have multiple solutions. Corrective actions may include but are not limited:

Potentials High & Low – adjust a rectifier or add ground bed or install interference bond,

Rectifiers – repair or replace the whole rectifier

Atmospheric Corrosion – repair paint and/or coating

Damaged or broken test stations – install new test leads or remove from survey with approval

Isolation – repair or replace”

In conclusion MarkWest believes all concerns have been addressed. Please let us know if there are any additional concerns.

Sincerely,

Dennis Thebeau

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MarkWest / MPLX