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May 19, 2014

Mr. Wayne T. Lemoi
Director, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
Southern Region
233 Peachtree Street, Suite 600
Atlanta, GA 30303

RE: Notice of Probable Violation
Proposed Civil Penalty
CPF 2-2014-5002

Dear Mr. Lemoi:

Please find enclosed Marathon Pipe Line LLC's (MPL) response to the above referenced Notice of Probable Violation (NOPV) and Proposed Civil Penalty dated April 16, 2014, concerning an inspection that occurred from June 11-November 30, 2012 and February 27, 2014.

The items inspected and the probable violations are below, along with MPL's response:

Item #1 states that Marathon did not make non-integrity repairs on an above ground breakout tank within a reasonable time after it discovered a condition that could adversely affect the safe operation of its pipeline system.

In 2007 MPL completed an API 653 inspection on Tank # 1220 located in Lima, OH. As a result of this inspection, MPL completed a Finite Element Analysis (FEA) for tank settlement. Upon additional work completed on the tank, a recommendation to complete a second FEA was proposed. During project closeout for the API 653 inspection in July 2007, the recommendation for the second FEA was not recognized and implemented. During an internal MPL process review in June 2012, the open FEA recommendation was identified. The settlement concerns were addressed with the initiation of a second FEA. Based on the second FEA, a monitoring plan was developed and approved in July 2012. The second FEA analysis was reviewed with PHMSA inspectors in July 2012 and the settlement monitoring plan was submitted to PHMSA in August 2012.

Results from both FEA's and the subsequent monitoring plan have shown that at no time was the integrity of the tank compromised and always remained safe for operation.

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MPL notes the following process improvements have been put in place since 2007, to ensure that recommended and appropriate actions occur within a reasonable time after completion of API 653 inspections:

- In January of 2009 creation of a Tank Program Leader position to provide additional oversight of MPL's tank inspection program. Responsibilities include verification of key control data on inspection due dates, completion of corrosion calculations and upload of closeout documents for completed API 653 External and Internal Inspections.
- Starting in 2010 utilization of the Equipment Database to manage aboveground storage tank (AST) information including tank characteristics, inspection due dates, critical level information, corrosion calculations, previous inspection reports, and documentation of closeout activities for inspector recommendations for the required API 653 External and Internal Inspections.
- In December of 2011 we increased focus on Quality Control during project execution through ongoing management system development including:
 - Scope development and review by AST technical experts or business partners to evaluate inspection findings and determine repair scope or the need for additional analysis.
 - Post-repair inspection review by a third party tank inspection firm and construction inspector, following completion of work to verify the established repair scope has been completed.
 - Post-repair inspection review by AST technical experts and MPL Tank Program Leader during the closeout process, to confirm inspection recommendations have been addressed.

Item #2 states that Marathon did not follow its procedures for energy isolation when performing maintenance at Effingham Station on August 23, 2012.

MPL notes the following process improvements have been put in place to help ensure consistent application of Energy Isolation during maintenance:

- Immediately after the incident, a Learning Bulletin was published and shared with all operations groups within MPL, reviewing the incident and sharing the initial lessons learned.
- MPL revised and performed refresher training on the Energy Isolation Process-Liquid and Vapor standard (MPL-SFT-00062-KNO) that detailed energy isolation requirements, in September of 2013. The revisions simplified MPL energy isolation requirements to make it easier for employees to know what is required and identified who can approve energy isolation plans for the different types of work and reinforced steps needed to request a variance to this standard.
- A "Hazard Recognition" training program was created and implemented, which included a revised Field "Stop Help Start" standard (MPL-OPR-00091-PRS). Field "Stop Help Start" was first rolled out to all field employees in 2011. The Effingham sump incident triggered a revision and second rollout including distribution of five revised "Stop Help Start" posters to all field locations in March of 2014. This training emphasized stopping work if it is not proceeding

according to the plan and getting stakeholders involved to make the appropriate modifications before re-starting work.

Item #3 states that Marathon exceeded 110% of the maximum operating pressure (MOP) of its Patoka-Martinsville 20-inch crude oil pipeline and some station piping at Effingham Station on August 23, 2012.

MPL notes the following process improvements that have been put in place to help ensure we do not exceed 110% of the MOP:

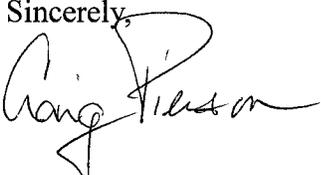
- A new classification of valve was created, "Pressure Control Critical Valves", along with identification of these valves and what steps are needed to alter the valve from its locked position.
- MPL has implemented an engineering project to ensure that all MPL sump pumps will be installed and fitted with a full flow relief system. This full flow relief system will allow a pump to run against a closed valve and not over pressurize a pipe section by returning the flow back to the sump. In 2013, MPL installed this new system in 20 sumps. In 2014, MPL has plans to install this system in 35 sumps, with another 39 to be completed in 2015. In 2016 and 2017 the remaining 28 sumps will have this system installed. In all 122 sumps in the MPL system will be outfitted with this full flow relief system.

MPL appreciates the dialogue we have had with PHMSA on these matters during and after the 2012 Inspection. We have made careful consideration of the elements discussed during those conversations. MPL shares PHMSA's goal of ensuring public safety and takes pride in our commitment to continuous improvement. We trust that our enclosed response reflects that commitment.

MPL has made arrangements to wire transfer the civil penalty to the appropriate account at the U.S. Treasury.

Please contact Randy Bishop at (419) 421-3712 or me at (419) 421- 4000 if you have any questions or wish to discuss these matters further. Thank you in advance for this consideration.

Sincerely,



Craig Pierson
President
Marathon Pipe Line LLC