

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 12, 2017

Mr. David Chalson
Senior Vice President, Operations
Mid-Valley Pipeline Company
401 Market Street
Aston, PA 19014

CPF 2-2017-5002M

Dear Mr. Chalson:

On September 12-15, 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), Southern Region inspected the Mid-Valley Pipeline Co. (MVPL) corrosion control procedures and records at your office in Hebron, Kentucky, pursuant to Chapter 601 of 49 United States Code.

On the basis of the inspection, PHMSA has identified apparent inadequacies within the MVPL written corrosion control procedures as described below:

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) ...
 - (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:**
 - (1) ...
 - (3) **Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

MVPL's corrosion control procedures do not contain adequate instruction on entering data into MVPL's corrosion control database.

MVPL Procedure OQP-011, titled *Conduct Annual Survey*, includes the following sections, as related to corrosion control data entry:

- 1.10. **DOCUMENT** all readings on the appropriate record form **OR CAPTURE** reading with data logger.

1.11. **RECORD OR TRANSFER** readings onto appropriate computer program **AND REPORT** all measurements to the SPLP Engineering Department.”

Per field interviews and PHMSA record review, MVPL personnel regularly enter values of “999”, “-999” or “0” into the corrosion database as a means of indicating that a valid pipe-to-soil (p/s) potential reading could not be made at a given test station. MVPL Procedure OQP-011 referenced above does not contain any instruction on this practice.

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 MVPL maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/ revision of plans, procedures) and submit the total to the Director, Southern Region – Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 2-2017-5002M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region

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