

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 15, 2020

Mr. Joseph Blount  
President & Chief Executive Officer  
Colonial Pipeline Company  
1185 Sanctuary Parkway  
Suite 100  
Alpharetta, GA 30009

**CPF 2-2020-5003M**

Dear Mr. Blount:

Between January 14, 2019, and February 7, 2020, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected Colonial Pipeline Company's (Colonial) written procedures covering its pipeline system in Alabama, Georgia, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, and Texas, pursuant to Chapter 601 of 49 United States Code (U.S.C.).

Based on the inspection, PHMSA has identified apparent inadequacies within Colonial's plans or 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:**  
.....
  - (3) **Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

Two (2) Colonial procedures reviewed during the inspection were inadequate to assure safe operation of a pipeline facility because they omitted key steps for personnel to perform while conducting inspections of overpressure safety devices required by § 195.428(a). The procedures which omitted key steps were the *Equipment Maintenance Procedure: Pressure Switches – System Integrity, EM-6.1-SI, Rev. 10* (“EM-6.1-SI”) and the *Equipment Maintenance Procedure: Pressure Relief Valves, EM-6.6-SI, Rev. 12* (“EM-6.6-SI”).

At the time of PHMSA’s Colonial Procedure EM-6.1-SI, covering inspection and maintenance of pressure switches, omitted steps requiring Colonial personnel to reset the inhibitor alarm after conducting routine inspection and maintenance on pressure switches. Colonial personnel acknowledged during the inspection, on September 25, 2019, that failure to reset the inhibitor alarm after routine inspection and maintenance may pose a safety or integrity threat.

Further, at the time of PHMSA’s inspection, Colonial Procedure EM-6.6-SI, covering inspection and maintenance of pressure relief valves, omitted the step of resetting the control room lockout that is required when inspecting and maintaining certain relief valves. During PHMSA’s inspection, Colonial personnel acknowledged that failure to perform a reset of the control room lockout after routine inspection and maintenance may pose a safety or integrity threat.

In a December 23, 2019, communication, Colonial stated that “[t]hese steps are covered in other operations manual and processes” and that Colonial will not make revisions to EM-6.1-SI and EM-6.6-SI at this time.

While both EM-6.1-SI and EM-6.6-SI have a section for “References,” at the time of PHMSA’s inspection, neither procedure directed Colonial personnel to read or refer to any specific, incorporated “References” requiring them to reset the inhibitor alarm or control room lockout, as referenced above.

**2. § 195.589 What corrosion control information do I have to maintain?**

**(a) ...**

**(c) You must maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey, and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist. You must retain these records for at least 5 years, except that records related to §§195.569, 195.573(a) and (b), and 195.579(b)(3) and (c) must be retained for as long as the pipeline remains in service.**

Colonial’s written procedure for stray currents was inadequate to assure safe operation of a pipeline facility because it did not require Colonial personnel to maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey, and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures did not exist.

For pipelines exposed to stray currents, § 195.577 requires Colonial to develop a program to identify, test for, and minimize the detrimental effects of stray currents. Colonial’s procedures for stray current testing are found in its *Maintenance Procedure: Inspect and Test Cathodic Protection Electrical Isolation* (“Isolation Test Procedure”), Rev. 1.

At the time of PHMSA’s inspection, the above-referenced Isolation Test Procedure did not require personnel to maintain a record of each test. For both aboveground and underground isolation devices, the referenced procedure directed personnel that “**IF** necessary,

**DOCUMENT** inspection and test results in field log and/or data logger **AND ENTER** data into Corrosion Prevention database” (Emphasis added). The procedure was inadequate because it did not adequately identify when the records were required to be maintained. Moreover, the tests required by § 195.577 are tests required by Subpart H, and thus, per § 195.589(c), a record of each test is required.

#### 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, Colonial has 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If Colonial does not respond within 30 days of receipt of this Notice, this constitutes a waiver of its 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 Colonial and to issue an Order Directing Amendment. If Colonial’s plans or procedures are found inadequate as alleged in this Notice, Colonial may be ordered to amend its plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If Colonial is not contesting this Notice, PHMSA proposes that Colonial submit its amended procedures to PHMSA’s Office of Pipeline Safety, Southern Region, within 45 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 any amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Colonial Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Director, Office of Pipeline Safety, PHMSA Southern Region. In correspondence concerning this matter, please refer to **CPF 2-2020-5003M** 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*