



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 26, 2012

Mr. Shawn M. Lyon  
Vice President of Operations  
Marathon Pipe Line LLC  
539 South Main Street  
Findlay, OH 45840

**CPF 3-2012-5009M**

Dear Mr. Pierson:

During the months of July through December 2010, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Marathon Pipeline products facilities in the Ohio area.

On the basis of the inspection, PHMSA has identified apparent inadequacies found within Marathon Pipeline Company (Marathon) plans or procedures, as described below:

- 1. §195.402 (a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.**

Marathon's procedures did not adequately define that the piping and appurtenances connected to breakout tanks as part of the pipeline system. Per §195.2 a pipeline system includes all parts of a facility through which hazardous liquid moves in transportation (i.e. pipe, breakout tanks, etc.) and connected appurtenances. Marathon's procedures should include the valve, piping and other appurtenances (e.g. tank mixers and circulating pumps, etc.) connected to the breakout tank.

2. **§195.402 (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.**

Per §195.571, cathodic protection (CP) must comply with applicable criteria; however, Marathon's procedures did not adequately specify how close interval survey (CIS) readings are used to determine target "on" voltages to the cathodic protection levels for annual CP surveys. CIS were performed between 2005 and 2006 for most of pipelines. The CIS for Marathon line "CRK" to Steubenville showed readings more positive than -.850 volts off and more negative than -1.250 volts off. Additionally, other line segments had "off" readings significantly more negative than -1.250 volts. "Off" readings more positive than -.850 volts off and more negative than -1.250 volts off could indicate deficiencies in the CIS. No information was provided that demonstrated that these deficiencies were resolved. Target "on" readings were established as a result of these current interrupted close interval surveys, and using erroneous "off" readings will generate false target "on" voltages. Therefore, Marathon's procedures should provide specific details to identify and resolve deficiencies in close interval surveys.

3. **§195.402 (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.**

Per §195.573, correction of identified deficiencies must be completed as required by Sec. 195.401(b) or Sec 195.452(h); however, Marathon's procedure for correcting shorted casings did not address the type of short or the time interval to correct an identified deficiency. The procedure must describe what testing is used to determine whether a short is metallic or electrolytic. Marathon needs to establish procedures to address corrective actions and the time interval to complete those corrective actions.

#### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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 a Final Order.

If, after opportunity for a hearing, 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. § 190.237). 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 that Marathon Pipelines maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to David Barrett, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2012-5009M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "D.A. Barrett". The signature is stylized and somewhat cursive.

David Barrett  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration