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July 15, 2019

VIA UPS OVERNIGHT DELIVERY

Allan C. Beshore, Director
Central Region, OPS
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

RE: Response to Notice of Probable Violation and Proposed Civil Penalty CPF 3-2019-5006

Dear Mr. Beshore:

On behalf of Phillips 66 Pipeline LLC (Phillips 66), we submit this response to the Notice of Probable Violation and Proposed Civil Penalty CPF 3-2019-5006 dated June 14, 2019 (NOPV). The NOPV was received by Phillips 66 on June 17, 2019. Phillips 66 has decided not to contest the allegation contained in the NOPV subject to the correction of facts as set forth in this response. Further, as stated herein, we request an explanation as to the proposed civil penalty as it seems excessive for the violation.

With respect to the NOPV, Tank 6818 which was inspected on August 22, 2017 is located at our terminal at East St. Louis, Illinois. The location of the tank is incorrectly identified in the NOPV as being located at the Hartford Terminal in Hartford, IL. We request that the Final Order be corrected with the proper location.

With respect to the proposed civil penalty, we request an explanation as to the proposed civil penalty as it relates to the alleged violation. As stated in the NOPV, the matter was identified during an inspection in August 2017 and was corrected on the same day. There was not an incident, safety or environmental, associated with the matter. We recognize the statutory amounts that apply to violations, but the amount seemed excessive when there are no damages or impact on the environment and the matter was corrected on the same day.

We request that you provide a corrected Final Order and request your consideration to lower the proposed penalty. Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read "V. Williams".

Van P. Williams

Cc: (via email)
Todd Denton
Todd Tullio