



Angie Kolar
SVP Operations Services & Chief Risk Officer

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June 27, 2022

Via Electronic Mail

Mr. Gregory A. Ochs
Director, Central Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

**Re: Colonial Pipeline Company
Warning Letter, CPF 3-2022-027-WL**

Dear Mr. Ochs:

This letter is in response to Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Warning Letter, CPF 3-2022-027-WL, to Colonial Pipeline Company (Colonial or the Company) dated May 27, 2022 relating to PHMSA's January 27-November 12, 2020 Control Room Management (CRM) inspection. The Warning Letter alleges probable violation(s) of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The purpose of this letter is to respond, without admission, to the Warning Letter pursuant to 49 C.F.R. § 190.205.

The alleged probable violations are listed below, followed by Colonial's response in italic font. Relevant amendments that have been prepared to the CRM procedures in response to the Warning Letter are attached with revisions within the procedure documentation highlighted in yellow. All procedure amendments will become effective upon receipt of PHMSA approval. Because of the nature of these issues and the overlap with other related enforcement issued by PHMSA, Colonial respectfully requests a meeting with the Agency to discuss the Company's response to the Warning Letter.

1. §195.446 Control room management.

(a) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011, and must



implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4) and must be implemented no later than August 1, 20212. The training procures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

Colonial failed to follow their procedure ADM-CPC-006 by not completing shift turnover documentation between the morning and afternoon shift for the Greensboro Local Console for the years 2017, 2018 and 2019. This procedure supported compliance with §195.446(b)(4) and §195.446(c)(5). This console operated two 8 hour shifts from 6:00 am - 2:00 pm and 2:00pm - 10:00 pm Monday - Friday (afternoon shift times vary depending upon scheduled batch products). Personnel completed a shift change, with conversation and documentation around 2:00 pm. There is no documentation at the end of the afternoon shift for the afternoon controller pass along, without conversation, to share with the next morning controller nor on Friday afternoon for the Monday morning controller. The CRM Plan and Administrative Procedure ADM-CPC-006 requires controller to complete a shift turnover document.

Colonial's Response

Colonial has prepared amendments to the CRM plan (page 38) and procedure ADM-CPC-006 "Shift Change & Handover of Responsibility" Section 3 to clarify the expectation of completing a shift turnover at facilities that are intermittently staffed and where a face-to-face conversation cannot take place. See Attachment WL1. The implementation of this amended procedure will ensure documentation is produced to substantiate a proper shift turnover for the Greensboro Local Console.

2. §195.446 Control room management.

(a)...

(j) An operator must maintain for review during inspection:

(1) Records that demonstrate compliance with the requirements of this section;

Colonial did not provide records to demonstrate compliance with §195.446(h) documenting the review of the field controller training program for 2017, 2018, 2019.

Colonial had separate training paths; one was for the Alpharetta Main Control Room, managed by Control Room staff and the other was for field personnel (includes field controllers), managed by HR Training. Alpharetta Main control room and field control rooms shared the same CRM plan. Accountability and responsibility for the training programs and content fell under separate organizations of which both must adhere to §195.446 for any control room operating under the CRM Rule related CRM Plan and procedures. The annual review of the training program content



only covered the Alpharetta control room with the exception of the annual CRM Training for both Alpharetta and field controllers. While the HR Training group indicated they performed continuous training review, they were not able to provide documentation to demonstrate compliance.

Colonial's Response

Colonial believes that this Warning Letter item is closely related to item 8 in the Notice of Amendment (NOA), CPF 3-2022-028-NOA issued to Colonial, to which Colonial has responded under separate cover. In particular, in response to NOA item 8, Colonial prepared amendments to its CRM plan to require the completion of "Attachment D-Controller Training Program Content & Effectiveness Review Form" for use in documenting the annual controller training content review. See Attachment WL 2. The implementation of the form will ensure documentation is generated to substantiate the annual review of the controller training program content, which addresses both the concern expressed in this Warning Letter item and NOA item 8.

As noted above, Colonial would appreciate the opportunity to meet with PHMSA to discuss the Warning Letter and Colonial's response. Please call Quintin Frazier at 678-762-2270 or me at 678-762-2290 to set up a meeting and/or if have any questions or concerns regarding this response.

Respectfully,

DocuSigned by:

Angie Kolar
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SVP Operations Services & Chief Risk Officer

cc: Joseph A Blount, President & CEO
Quintin Frazier, Director, Pipeline Compliance

Attachments

WL1 (CRM plan (page 38) and procedure ADM-CPC-006 "Shift Change & Handover of Responsibility" Section 3)

WL2 ("Attachment D-Controller Training Program Content & Effectiveness Review Form")