



PLAINS
PIPELINE, L.P.

May 9, 2013

Mr. Rodrick M. Seeley
Regional Director – Southwestern Region
Pipeline and Hazardous Material Safety Administration
8701 South Gessner Road, Suite 1110
Houston, Texas 77074-2949

RE: Response to Notice of Amendment, CPF 4-2013-5008M

Dear Mr. Seeley:

Plains Pipeline, L.P. (Plains) submits the following response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Notice of Amendment (NOA) CPF 4-2013-5008M, Items 1 – 13 listed in the NOA.

1. Plains Specification "Storage Tanks, New Construction (API 650" was revised to specify the use of the latest version of API 650 incorporated by reference in Part 195.
2. Plains Operations & Maintenance Manual, Appendix C procedure P-195.205(b)(1), "Alteration & Reconstruction of Aboveground Breakout Tanks" was revised to specify the use of the latest version of API 653 incorporated by reference in Part 195.
3. Plains procedure P-195.264(b)(1), "Impoundment of Breakout Tanks" was revised to specify the use of the latest version of NFPA 30 incorporated by reference in Part 195. In addition, reference in the procedure to section 4.3.2.3.2 of NFPA 30 for impoundment around a breakout tank and section 4.3.2.3.1 for impoundment by drainage to a remote impounding area was verified.
4. Procedure P-195.264(c), "Protection of Breakout Tanks From Unauthorized Entry" was revised to reference site specific security plans as applicable, and to state in the procedure steps to refer to the Site Security Plan for security requirements for facilities that have a Site Security Plan. For facilities without a specific Site Security Plan, the security inspection requirements steps in the procedure will be followed.
5. Procedure P-195.264(e), "Normal and Emergency Venting" was revised to specify the use of the latest version of API Standard 2000 incorporated by reference in Part 195.

Plains GP LLC, General Partner
333 Clay Street, Suite 1600 (77002) ▪ P.O. Box 4648 ▪ Houston, Texas 77210-4648 ▪
713-646-4100

6. Procedure P-195.307(d), Hydrostatic & Pneumatic Testing of Breakout Tank (Return to Service)” was revised to show paragraph 12.3 of API 653 as the correct regulatory requirement for the latest version of API 653 incorporated by reference in Part 195.
7. Procedure P-195.307(c), “Hydrostatic & Pneumatic Testing of Breakout Tank (First Service) and Procedure P-195.307(d), “Hydrostatic & Pneumatic Testing of Breakout Tank (Return to Service)” were revised to reference a tank hydrostatic test certification form and to state in the procedure steps that after completion of a test, the certification form will be completed and filed for the life of the tank. In addition, Engineering Specification PAALP-ENG-SPC-007, “Storage Tanks New Construction (API 650)” was revised to require the hydrostatic test contractor to provide the documentation of a tank hydrostatic test if performed, and completion of the Plains Tank Hydrostatic Test Certification form. The Plains procedure and specification require that all hydrostatic test records be maintained for the life of the tank.
8. Procedure P-195.405(a), “Protection Against Tank Ignitions” was revised to specify the use of the latest version of API Recommended Practice 2003 incorporated by reference in Part 195.
9. Procedure P-195.405(b), “Safe Access & Egress for Floating Roof Tanks” was revised to specify the use of the latest version of API Publication 2026 incorporated by reference in Part 195.
10. The “Frequency” section of Procedure P-195.432(b) was revised to show the correct frequency of internal and external inspections in accordance with the requirements of API 653, latest version incorporated by reference in Part 195.
11. The NOA stated that at the time of the inspection (August 2011), Plains procedure P-195.432(b), item 1m required a monthly inspection of security measures; however, Form 505 had no provision for documenting the security inspection. This procedure never included a security inspection and the form never included a line item for documenting the inspection. As a result of PHMSA’s comment, Plains has reviewed its monthly breakout tank inspection protocol and considers including facility security inspections as part of the tank inspections a prudent and responsible practice. Accordingly, procedure P-195.432(b) and Form 505 have been revised to include a security check as part of monthly breakout tank inspections.
12. O&M Section 412 on the sub-section for Corrosion Control, Breakout Tanks was revised to specify the use of the latest version of API RP 651 incorporated by reference in Part 195. Plains Specification 719, “Cathodic Protection System for Aboveground Storage Tanks with Claymax Liner or Without Liner” was revised to specify the use of the latest edition of API RP 651 incorporated by reference in Part 195.

Mr. Rodrick Seeley
Director, Southwest Region, PHMSA
Response to NOA CPF-2013-5008M
May 9, 2013
Page 3 of 3

13. Plains Specification 719, "Cathodic Protection System for Aboveground Storage Tanks with Claymax Liner or Without Liner", section 9.0, Compliance Criteria, was revised to be consistent with the CP compliance criteria given in the O&M Manual Section 412.

We trust that these responses satisfactorily and completely address the items in PHMSA's Notice of Amendment, CPF 4-2013-5008M. Although we recognize that PHMSA's comments in the NOA are not directly related to pipeline safety, the comments are beneficial in helping Plains maintain a strong pipeline safety record and to improve its administrative records practices to demonstrate compliance with the pipeline safety regulations. Plains appreciates PHMSA's constructive comments from an audit of its regulatory compliance program.

If you have any questions, or require additional information, please do not hesitate to contact Tom McLane, 713-646-4109, tjmclane@paalp.com.

Sincerely,



Troy E. Valenzuela
Vice-President, Environmental, Health and Safety

cc: T. McLane *TJM*
M. Kelley
J. Shelton
A. Abrahamson
A. Gopalani