



May 25, 2018

VIA OVERNIGHT MAIL

Mary L. McDaniel
Director, Southwest Region
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
8701 S. Gessner, Suite 630
Houston, TX 77074

Subject: Response to CPF-4-2018-5008M

Dear Ms. McDaniel,

I am respectfully responding to your letter dated April 27, 2018, in which you requested notification that all violations had been corrected for **CPF-4-2018-5008M**. Indorama Ventures Olefins, LLC (IVOL) is submitting this letter in response to the alleged violations:

Document Number: CPF-4-2018-5008M

Item #1: 195.408 Section 1.11 Communications

Violation Description: Section 1.11: Communications to meet the requirements of §195.408 Communications. Indorama's procedures closely paraphrased the regulations and did not include details specific to the Indorama pipeline system. Indorama's procedure should include specific details of the Indorama communication system requirements that ensure the communications system provides for the efficient transmission of information needed for the safe operation of the Indorama pipeline system.

Indorama Response: IVOL has revised Sec. 1.9 (formerly 1.11) to include detail on the communication methods used to transmit information needed for the safe operation of the pipeline system. See attached **Exhibit 1** for supporting documentation.

Item #2: 195.444 Section 7.4 CPM Leak Detection

Violation Description: Section 7.4: CPM Leak Detection to meet the requirements of §195.444 CPM Leak Detection. Indorama's procedures paraphrase the regulations and didn't include details specific to the Indorama pipeline system. Indorama's procedure should include the requirement to evaluate the capability of its leak detection system, and modify as necessary, where the process for evaluation includes length and size of the pipeline) type of product carried, the pipeline's proximity to the high consequence area, the swiftness of leak detection, location of nearest response personnel, leak history, and risk assessment results.

Indorama Response: IVOL does not currently have an active CPM leak detection system on this pipeline. Therefore, no procedure can be fully developed. However, in Section 7.4, IVOL included a note that



indicates no CPM leak detection system is used but, if one is brought into service in the future a detailed procedure will be developed. See attached **Exhibit 2** for supporting documentation.

Item #3: 195.403 Section 19 Emergency Response Training

Violation Description: Section 19: Emergency Response Plan of the Liquid Pipeline Operations, Maintenance & Emergency Manual: Training of the Emergency Response Plan to meet the requirements of §195.403 Emergency Response Training. Indorama's procedures paraphrase the regulations and did not include details specific to the Indorama pipeline system. Indorama's procedure also did not include product specific guidance for emergency response and emergency response training. Indorama's procedures must include the requirement that emergency personnel are trained on the specific characteristics and hazards of the hazardous liquids transported, which is ethylene for this pipeline.

Indorama Response: IVOL has revised its Emergency Response Training procedure to include details specific to IVOL's pipeline system and that emergency personnel are trained on the specific characteristics and hazards of ethylene. See attached **Exhibit 3** for supporting documentation.

Item #4: 195.402(e) Section 19.10 Accidental Release of Hazardous Liquid

Violation Description: Section 19 Emergency Response Plan, Part 19.10: Accidental Release of Hazardous Liquid to meet the requirements of §195.402(e) Emergencies. Indorama's procedures did not include details specific to the Indorama pipeline system. Section 19.10: Accidental Release of Hazardous Liquid procedure should include correct information for forms used to notify the Accident Commander during an accidental spill. Indorama's procedure directs personnel to fill out the Indorama Spill Report Form and to fax this form to the Accident Commander. This referenced form is not assigned a number and is not included in the list of forms Section 21: Forms, with this manual. Indorama had not developed the Spill Report Form at the time of this inspection.

Indorama Response: IVOL has revised Section 19.11 (formerly 19.10) to outline that an IVOL Leak Report will be emailed instead of faxed to the Accident Commander. IVOL also included a reference to Form 21.21 which is the Leak Report form created to satisfy this item. See attached **Exhibit 4** for supporting documentation.

IVOL is committed to full compliance with the requirements of PHMSA and appreciates your consideration in this matter. Please let me know if you have any questions or require additional information. I can be reached at (337) 476-9237 and Saswati.Biswas@us.indorama.net.

Sincerely,

Saswati Biswas

Chief Financial Officer

INDORAMA VENTURES OLEFINS, LLC