PLAINS
PIPELINE, L.P.

May 3, 2019 Certified Mail No: 7010 1870 0001 4873 2232

Ms. Mary McDaniel
Regional Director – Southwestern Region
Pipeline and Hazardous Material Safety Administration
8701 S. Gessner, Suite 630
Houston, Texas 77074

Subject: Notice of Amendment - CPF No. 4-2019-5005M
Plains Pipeline, L.P.

Dear Ms. McDaniel:

On February 1, 2019, Plains Pipeline, L.P. (Plains), received Notice of Amendment (NOA) CPF 4-2019-5005M dated January 31, 2019, from the Pipeline and Hazardous Materials Safety Administration (PHMSA) concerning a PHMSA audit of procedures and records for the construction, operation, and maintenance of [Plains'] Red River and Caddo pipelines in Oklahoma, Louisiana, and Texas. Plains requested an extension until May 6, 2019 for submittal of its response to the NOA, which PHMSA granted on February 27, 2019.

The NOA identified apparent inadequacies found within Plains' plans or procedures, as summarized below and identified with ***boldface italic*** text. Plains' responses follow each item, respectively:

1. ***§195.234(b)(2) Welds: Non-Destructive Testing – training of personnel***
The regulation requires nondestructive testing (NDT) of welds be performed in accordance with written procedures and by personnel that have been trained in the established procedures and in the use of the equipment. While the Plains procedure states that film interpreters may be required to pass a qualification program, it does not state what "passing" means. There is no qualitative or quantitative measure provided for which a qualification program may be evaluated to ensure that the film interpreter has the requisite knowledge needed for the work… The Plains procedure must be amended to clarify what "passing" a qualification test means and what actions are taken if a film interpreter fails to pass the qualification test.

   Plains Response:
   Plains revised Section 4.2 of procedure *PAALP-ENG-SPC-WEL-210: Radiographic Inspection of Girth Welds* to remove the requirement that personnel "pass a PAAPLP qualification program." Plains obtains and verifies NDT records from its third party contractors. Enclosure 1 includes the revised page from the procedure with a redline of the deleted text.

2. ***§195.402(c)(5) Analyzing pipeline accidents to determine their causes. Plains O&M manual, Appendix C, Section 195.402(c)(5)/(e)(9) contains the procedure for post-accident analysis and investigation. Currently, page 2 in the aforementioned O&M section states that accident analysis is the responsibility of the District Manager and Director of Environmental and Regulatory Compliance… Plains should amend their procedures to clearly identify the responsible party for accident analysis to reflect recent changes within the Plains' organization.***

   Plains Response: In January 2019, Plains issued a fully revised, updated, and re-formatted O&M Manual. Plains revised procedure, Section 2.1.1 of P-195.402(c)(5)/(e)(9)–*Analyzing Pipeline Accidents* to incorporate Plains Policy No. 70.0, Incident Investigation/Lessons Learned Policy which clearly identifies the responsible parties for accident analysis consistent with the current Plains organizational structure. In Plains Policy No. 70.0, Section 3.4 details which parties are responsible to investigate an incident based on the risk-classification.

   Enclosure 2 includes the pages from P-195.402(c)(5)/(e)(9), Section 2.1.1 with a redline of the revised text. Enclosure 3 includes Plains Policy No. 70.0, Section 3.4.

3. ***§195.402(c)(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part. Plains conducts monthly inspections of the tank overfill alarms in accordance with established O&M Section 420 and Plains Procedure P-195.432(a)(b)&(c). The Plains Tank Inspection Form 505 requires that the inspector verify that the liquid gauge, level transmitter, and Control Center Levels are within tolerance. However, the form does not specify what the allowable tolerance should be, i.e. what would constitute an "unsatisfactory condition."… Plains must amend their procedures and inspection forms to clarify what is considered satisfactory or unsatisfactory with regards to tank level indicator readings between the tank gauge level, tank transmitter level and control center level.***

   Plains Response: Plains revised Form 505, Item 10 to require inspectors to "Verify liquid gauge, level transmitter, and Control Center levels are within 1" tolerance of each other." Additionally, Plains revised Item 10 of the instructions for the form to state "Record the levels of the three indicators; tank gauge, transmitter and Control Center level. If these three readings fall outside the 1" tolerance, follow the measurement and O&M manuals and contact the appropriate party for recalibration."

   Enclosure 4 includes Form 505 and instructions with the revised text to address this NOA item redlined.

Should you have any questions regarding this response, please do not hesitate to contact Jane Kelley, Director, Environmental & Regulatory Compliance, Mid-Continent Division at jkelley@paalp.com or (757) 898-9732.

Sincerely,

Wm. Dean Gore, Jr.
Vice President, Environmental & Regulatory Compliance

Enclosures (4)

cc: Sandra Tasso, Plains
Jerry Mackey, Plains
Justin Dixon, Plains
Kevin Cunningham, Plains
Monty Morris, Plains
Ngiabi Gicuhi, Plains
Tim Wharry, Plains
File

ENCLOSURE 1

PLAINS PROCEDURE *PAALP-ENG-SPC-WEL-210: RADIOGRAPHIC INSPECTION OF GIRTH WELDS*
REVISED PAGES (REDLINED)
(3 Sheets)

V10

4.0 RADIOGRAPHIC INSPECTION PERSONNEL

4.1 General

This section prescribes the qualification requirements for individuals who will be engaged in the production and evaluation of radiographs for PAAPLP.

4.2 Personnel Qualification

All regularly assigned radiographic personnel shall meet the requirements as defined in ASNT Recommended Practice; SNT-TC-1A, (latest accepted edition) National Response Center (NRC) and/or State Regulations for radiation safety. At least one member of each crew designated as being in charge shall meet the requirements for Level II given in SNT-TC-1A. Only Level II or Level III personnel who have been ~~approved~~verified by PAAPLP will be allowed to interpret radiographs. Records of certification for radiographers and interpreters shall be furnished to PAAPLP prior to production radiography and shall include the following:

- Background and Experience
- Training and Course Record
- Technical Examination Record
- Doctor's report of radiographer's Jaeger J-1 acuity eye test
- Date of Qualification and Requalification

The Project Engineer or Welding Inspector shall request the above information when the radiographic contractor is contacted for a work assignment. Each radiographer should carry a copy of his qualification with him to the job site.

~~In addition, film interpreters may be required to pass a PAALP qualification program that includes demonstrating their knowledge and understanding of this specification and passing a practical film interpretation test prior to production film interpretation.~~

Radiographers will be required to demonstrate their ability to produce acceptable radiographs with each radiographic procedure they use prior to performing production radiographs.

4.3 Training Requirements

Radiographic trainees, Level I, shall be trained by the contractor, prior to assignment, in the use of radiation monitoring equipment. A radiographic trainee shall not actuate radiation producing equipment in production radiography without the direct supervision of a Level II technician

4.4 Certification

Upon successful completion of the requirements of Personnel Qualification, Page 3 of this Specification, PAAPLP may issue, depending on the project duration, a certification card bearing the following:

- Name
- Signature of PAAPLP Examiner/Reviewer
- Expiration Date
- Identification of Level
- Social Security Number (Last 4 No.)

4.5 Performance Review

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The Level II or III radiographer and film interpreter's work will be subject to review by PAAPLP's representative and any pattern of inconsistency will be cause for additional training, testing, or dismissal.

Document comparison by Workshare 9.5 on Thursday, May 2, 2019 3:27:30 PM

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ENCLOSURE 2

PLAINS PROCEDURE *P-195.432(a)(b)&(c)*
ANALYZING PIPELINE ACCIDENTS
REVISED SECTION 2.1.1 (REDLINED)
(4 Sheets)

2.1.1 Gathering Data Needed to Report Accidents~~:~~

1. ~~1.~~ Identify and locate the accident area.
2. ~~2.~~ Shut down applicable operations. (See ~~Procedure P-195.402(e)~~Emergency Response).
3. ~~3.~~ Notify pertinent company and outside parties.
4. ~~4.~~ Dispatch personnel and equipment to the accident area.

~~5. Gather evidence. This includes taking pictures, samples, and employee interviews~~

5. Refer to Gathering Data Needed to Report Accidents.
6. ~~6.~~ Perform post -accident drug and alcohol testing if required in accordance with PHMSA requirements as quickly as possible.
7. ~~7.~~ Initiate ~~incident~~accident investigations ~~in accordance with this procedure~~per 70.0 Incident Investigation Lessons - Learned Policy, as applicable.
8. ~~Analysis of pipeline accidents to determine their cause is required by DOT regulations.~~Analyze accident per Failure or Cutout Inspection and Analysis Procedures

   A team may be assembled to review the accident. The team may consist of the Pipeline Control Supervisor, Controller on duty during accident, Area Supervisor, Corrosion Supervisor, ~~ERC~~E&RC Director, District Manager, or designee, and various Engineering, Operations, and Integrity Department representatives, and legal department as appropriate.

~~The initial task of the accident analysis team is to assemble and review facts regarding the accident and develop a brief, concise incident statement. The statement should describe conditions prior to the accident, what went wrong, what the consequences were, and what was or will be done to correct the situation. The statement shall only include factual evidence and not contain speculation, assumptions, or opinion.~~ The Legal Department shall participate in any investigation and documentation of events related to injury or fatality, non-Plains property damage, or regulatory involvement.

~~The cause of the accident shall be determined and any and all actions that would minimize the possibility of a similar accident shall be recommended in the investigation report.~~

~~The team's analysis should include, as appropriate, a review of the SCADA system and data before and at the time of failure, operating and maintenance procedures, training and qualification, and equipment history.~~ The team's final report, including copies of ~~DOT~~PHMSA reports, state reports, and Final Spill Cleanup Report as necessary, shall be distributed to the Legal Department within 90 days of the accident, as appropriate. The Legal

Department will then disseminate the report to ~~the EH&S~~E&RC, Operations, Engineering, and Integrity Management groups.

~~Regulations also require that a pipeline company's actions in response to an accident be reviewed to determine if procedures were followed and the effectiveness of the procedures in use. This review may be completed at the same time as the accident analysis by the same team. The response procedure review must be documented and made part of the accident file. Recommendation of any changes should be prepared and sent to the Division E&RC Director.~~ Documentation of the response effectiveness review shall be documented on ~~Figure 8.3-1~~the appropriate form located in the ~~FRPs~~Emergency Response Plans (ERPs) and the Plains intranet under Operations & Maintenance (O&M) forms. The investigation report file shall include all documents associated with the investigation including all completed forms~~.~~

Document comparison by Workshare 9.5 on Thursday, May 2, 2019 3:37:33 PM

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ENCLOSURE 3

PLAINS POLICY NO. 70.0
INCIDENT INVESTIGATION / LESSONS LEARNED POLICY
SECTION 3.4
(4 Sheets)

analysis. For failed piping or equipment components refer to PAALP-INT-PRC-101 Failure or Cutout Inspection and Analysis Procedure if more detail analysis is required. This determination will be made by integrity or the investigation team.

2. Take pictures of the resulting state of damaged equipment or components. Utilize dimensional references as appropriate.
3. Retain samples of any residues and / or products released to verify material properties.

Additional evidence may be necessary to gather depending on the event category or unique circumstances.

3.4 Risk Based Investigations

The Incident Management Risk Matrix, see ***Incident Management Risk Matrix,*** provides a structured method for evaluating and ranking incidents in order to determine the level of investigation and make-up of the investigation team.

Good Catches or Close Calls do not require risk ranking. The risk assessment for Incidents should be completed as soon as practical but at least within 7 days of the incident. In partnership with operations, the E&RC Specialist is required to risk assess for the KMI event categories environmental release and equipment failure, and the Division Safety Manager is required to risk assess for all other KMI event categories.

Based on the resulting risk score, investigation requirements are summarized in the table below. Risk ranking begins the investigation process and delaying risk ranking causes a delay in completing the investigation within the later referenced 30, 60, and 90 day timeframes.

Risk Category	Investigation Requirements
Good Catch	• If Corrective Action is identified and noted as "complete" within the First Report Description box then choose the applicable Root Cause(s) on the Investigation Tab and save within KMI. • Otherwise follow the Close Call investigation requirements below
Close Call	• Local Investigation to be led by Operations Supervision • Investigation team should include:

	○ Local Team Member • Collect the facts of the event • Investigation team to analyze facts using 5 Why technique* • Determine root cause(s) and contributing factor(s) and match these with ***Root Cause Table*** from KMI • At least one corrective action to address each root cause will be input into KMI.
Low OR Medium Low Incident	• Local Investigation to be led by Operations Supervision • Investigation team should include: ○ Local Team Member ○ Subject Matter Expert(s)** ○ E&RC Specialist or Division Safety Manager as applicable • Collect the facts of the event • Investigation team to analyze facts using 5 Why technique* • Determine root cause(s) and, as appropriate, contributing factor(s) and match these with ***Root Cause Table*** from KMI • At least one corrective action to address each root cause / contributing factor will be input into KMI.
Medium High Incident	• Investigation to be led by Operations Supervision, Division Safety Manager, E&RC Specialist, or Integrity depending on event category. • At the request of local management and approval by the associated Director, a Lead Incident Investigator can be assigned to the investigation. • Investigation team should include: ○ Local Team Member knowledgeable in the process (employee and / or contractor)

	○ Subject Matter Expert(s)** • Collect the facts of the event • Investigation team to analyze facts using 5 Why technique* • Determine root cause(s) and, as appropriate, contributing factor(s) and match these with ***Root Cause Table*** from KMI. • At least one corrective action to address each root cause / contributing factor will be input into KMI.
High Incident	• Investigation to be led by Division Safety Manager, E&RC Specialist, Integrity or Lead Incident Investigator depending on event category • Investigation team should include: ○ 1-2 Personnel from other assigned areas ○ Local Team Member ○ Subject Matter Expert(s)** • Collect the facts of the event • Investigation team to use 5 Why technique or alternative root cause technique • Witness statements may be required; utilize the ***Initial Witness Statement Form***. • Determine root cause(s) and, and as appropriate, contributing factor(s) and match these with ***Root Cause Table*** from KMI • For investigations led by Lead Investigator, formal report utilizing the Investigation Report Form will be attached to KMI • At least one corrective action to address each root cause / contributing factor will be input into KMI.
Very High Incident	• Same requirement as High Incident • Lead Investigator to lead the investigation or 3rd Party Investigator may be used as appropriate

	• PAA Lead Incident Investigator will direct activities of 3rd Party led investigation team • Determine root cause(s) and contributing factor(s) and match these with ***Root Cause Table*** from KMI • At least one corrective action to address each root cause / contributing factor will be input into KMI.

*5 ***Why Table Analysis – Step-by-Step*** is available in Forms

Subject Matter Experts are event dependent and could include personnel such as Operations Technical Support, Technical Services, Integrity, Commercial, Third Party, etc.

3.5 Investigation Timing

Target investigation completion timing – the investigation lead should endeavor to complete the investigation and document within KMI as per the table below. The Division Safety Manager or E&RC Specialist will provide guidance on investigation timing should regulation require an expedited completion.

Risk Level	Days
Good Catch **Close Call** **Low / Medium-Low Incident**	30
Medium-High Incident	60
High / Very High Incident	90

Any safety critical action item(s) identified at any point in the investigation process will be communicated to the applicable Operations Supervision as soon as identified. For Medium-High risk incidents and above, the length of time may extend beyond the targeted days depending on the complexity of the incident.

3.6 Investigation Requirements

Investigation Requirements

Regardless of risk score, each event's investigation will include the following:

1) Identification of incident cause(s) and contributing factors; including

ENCLOSURE 4

PLAINS *TANK INSPECTION FORM 505 AND INSTRUCTIONS*
(REDLINED)
(9 Sheets)

PLAINS	1. Division	2. District	3. County/Parish	4. State	TANK INSPECTION FORM 505
5. Facility Name	6. Tank No.	7. Tank Operation (Check all that apply) ☐ Pipeline ☐ Truck ☐ Other (explain):	Pipeline System (if applicable):		8. Jurisdiction ☐ DOT ☐ SPCC
9. Inspection Date (mm/dd/yy)					

10. Inspection Data	Satisfactory	Unsatisfactory	N/A
a. Shell			
b. Coating/Insulation			
c. Ringwall/Foundation			
d. Grounding			
e. Mixer			
f. Water draws locked & closed			
g. Retention Berm			
h. Inside retention berm			
i. Berm drain valve closed & locked			
j.Truck load box locked closed			
k. Tank connections/valves			
l. Security Check			
m. Verify Hi-Hi alarm is recognized in the Control Center			
n. Roof			
o. Roof Seals			
p. Vents			
Record the levels of the three indicators	**Gauge Level**	**Transmitter Level**	**Control Center Level**
Verify liquid gauge, level transmitter, and Control Center levels are within 1" tolerance of each other.			
Control Center Contact Name			

MONTHLY

11. Description of Unsatisfactory Condition			12. Description of Corrective Action or Evaluation	
abc	Date	Description	Date	Description
13. Inspector Name:			Supervisor Name:	

14. Comments:

Distribution: Distribution (by email or as noted): DOT Inspection - PHMSA Records Spec; SPCC Inspection - District Office
NOTE: If pen and ink signature required on DOT Inspection, mail record to PHMSA Records Spec.

Form 505 – Revised: ~~May 2016~~March 2018

TANK INSPECTION (FORM 505)

Purpose. The tank inspection form documents inspections of tanks in accordance with 49 CFR 195.432(a)&(b). Each tank will be visually inspected monthly and the findings documented on this form. Also, the roof of each tank will be inspected annually at intervals not exceeding 15 months, but at least once each calendar year in accordance with 49 CFR 195.432(a).

Note 1: The monthly inspection is to be done at least once during each calendar month.

Note 2: This form does not address the routine tank seal inspections required by NSPS regulations found at 40 CFR Part 60. Contact Air Programs Manager for the appropriate seal inspection forms.

Preparation. The individual performing this inspection completes this form. The individual performing this inspection must be either certified to perform Operator Qualification (OQ) Task 27.1, 20.0 and 30.0, or must perform this task under the direct supervision of someone who is OQ certified to perform them.

Distribution. Send (email preferred) the form to the PHMSA Records Specialist and supervisor of individual who completes the form. Individual who completes the form should also retain a copy.

Item#	Item Title	Instructions
1.	Division	Enter the Division where the inspection was performed.
2.	District	Enter the District where the inspection was performed.
3.	County/Parish	Enter the County or Parish where the inspection was performed.
4.	State	Enter the State where the inspection was performed.
5.	Facility Name	Enter the name of the facility in which tank is located.
6.	Tank No.	Enter the number assigned to the tank.
7.	Tank Operation	Enter data that applies.
	Pipeline System	Enter name of pipeline system tank assigned to (if applicable).
	Operation	Check box that applies to tank operation, Pipeline, Trucking or Other. (If other explain operation of tank)

PAA: LAW_COM: 1369888v~~1~~2

Form 505 – Revised: ~~May 2016~~March 2018

8.	Jurisdiction	Enter check in the box for the jurisdiction, DOT or NON-DOT. Contact Division Environmental & Regulatory Compliance personnel for clarification, as necessary.
9.	Inspection Date	Enter the date inspection was preformed. Note: Example-Click on that cell and insert inspection date, month/day/year.
10.	Inspection Data	Check appropriate box with (X) to indicate condition: S = Satisfactory U = Unsatisfactory NA = Not Applicable
	a. Shell	Inspect the shell of the tank for any distortions (wrinkling, buckling, soil on chime, soil eroded from under floor).
	b. Coating/Insulation	Inspect coating (paint) on tank (pealing, flaking, disbonding). If paint is fading and primer is still good then the coating is satisfactory. If tank is insulated check that insulation is not coming loose from shell.
	c. Ring wall/Foundation	Inspect the ringwall/foundation for cracks, (small hairline cracks do not hurt the integrity of the foundation). Check that foundation has not pulled away from tank floor or slid from under tank.
	d. Grounding	Check that ground cables are attached properly to tank and grounding rods. Check grounding cables from floating roof and ladder are attached properly to shell of tank.
	e. Mixer	Inspect mixers for leakage and attachment to tank.
	f. Water Draws Locked and closed	Inspect water draws (drain valves) to make sure they are not leaking and are closed and locked.

Form 505 – Revised: ~~May 2016~~March 2018

g. Retention Berm	Inspect berm for any sign of erosion, holes created by animals, large bushes, or trees. These conditions will affect the integrity of the firewall to contain the required capacity in case of an accidental release.
h. Inside retention berm	Inspect the inside of the berm for any material that may have been left from previous maintenance (old tank bottom material, metal, wood blocks, concrete slabs). Inspect for excessive vegetation growing next to tank shell.
i. Berm drain valve closed	If berm is equipped with a drain valve, inspect the valve to ensure it is in the closed position and secured
j. Truck load box locked closed locked closed	If equipped inspect truck load/unload box and connections for leaks.

10. Inspection Data (Continued)

k. Tank Connections	Inspect tank connections (for example, flanges, piping, piping connections, prover loop, valves, mixers, gauging devices, sumps, LACT, and so forth) for leaks. NOTE: The inspector should ensure that the valves used to isolate the tank are operable.
l. Security Check	Conduct security check of break out tanks and facility in accordance with O&M procedure P-195.264 (c).
m. Hi-Hi alarm verification	Call the Control center and ensure they are aware that the HI-HI alarm is about to be tripped. Manually trip the HI-HI sensor and ensure the control center recongizes the alarm.
n. Roof	Inspect roof for product, foreign debris. Inspect the roof to ensure it is level, does not have wrinkles, bends, or distortions.

Form 505 – Revised: ~~May 2016~~March 2018

	o. Roof seals	Inspect roof seals for, tears, folded over, missing pieces, not in contact with shell of tank. (This inspection is not meant to be inspections required by EPA or Air District regulations.)
	p. Vents	Inspect vents for foreign debris, and ensure they are working properly.
	Record the level readings	Record the levels of the three indicators; tank gauge, transmittor and Control Center level. If these three readings fall outside the ~~variance of the measurement manual for the tank, please~~1" tolerance, follow the measurement and O&M manuals and contact the appropriate party for recalibration.
	Record the control contact	Record who was working with you in the Control Center.
11.	Description of unsatisfactory condition	Enter the data for the unsatisfactory condition.
	Letter	Enter the letter from item 10 that corresponds to unsatisfactory condition.
	Date	Enter date condition reported.
	Description	Enter brief description of condition being reported.
12.	Description of Corrective Action or evaluation	Enter on the same line in item 11. Record the date (mm/dd/yy), the unsatisfactory condition was corrected or evaluated, and describe the corrective action or evaluation. Include the name of the individual who is responsible for this action. If required by an agency a signature may be used in lieu of an electronic name.
13.	Inspector name	Enter name of individual performing the inspection. If more than one inspector for the year enter inspectors on this line. If required by an agency a signature may be used in lieu of an electronic name.

Form 505 – Revised: ~~May 2016~~March 2018

14.	Comments	Enter comments that pertain to this inspection.

These instructions were revised: May 2016

Form 505 – Revised: ~~May 2016~~March 2018

Document comparison by Workshare 9.5 on Wednesday, May 1, 2019 5:18:38 PM

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