

## NOTICE OF AMENDMENT

**VIA FED EX – TRACKING NO. 7704 0317 3438**

October 3, 2017

Mr. Bruce E. Johnston  
Pacific Operators Offshore LLC  
Vice President, Operations Superintendent  
1145 Eugenia Pl., Ste. 200  
Carpinteria, CA 93013

**CPF 5-2017-7003M**

Dear Mr. Johnston:

On several occasions between February 14, 2017 and April 14, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, inspected the Pacific Operators Offshore LLC (POOLLIC)'s Operations and Maintenance (O&M) procedures in La Conchita, California.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within POOLLIC's plans or procedures, as described below:

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
  - (c) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**
    - (3) **Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

POOLLC's Procedure #14.01, Valve Security, is inadequate in which it did not contain adequate procedures for providing protection at other exposed facility in accordance with 49 C.F.R. §195.436. POOLLC must revise its procedure to include scraper traps to be protected from vandalism and unauthorized entry.

**2. §195.440 Public awareness.**

**(a) Each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see §195.3).**

POOLLC's Public Awareness Plan is inadequate in which it did not address a description of the roles and responsibilities of personnel administering the program and identification of key personnel and their titles (including senior management responsible for the implementation, delivery and ongoing development of the program) pursuant to API RP 1162, Section 7.1 (b) and (c).

POOLLC must revise its procedure to include the following items:

- (a) An individual manager position identified and staffed with an individual having responsibility to administer the program,
- (b) Adequate resources are provided (personnel, funding) to implement the program,
- (c) Adequate number of employees involved with implementing the program,
- (d) Individual supporting roles are defined, and
- (e) External support resources for program implementation or evaluation the operator uses are defined.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. §

190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that the Pacific Operators Offshore LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Huy Nguyen, Acting Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2017-7003M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Huy Nguyen  
Acting Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 M. Garcia (#155277)

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*