

NOTICE OF AMENDMENT

VIA E-MAIL TO MR. JOHN D'ANDREA

June 11, 2021

Mr. John D'Andrea
Head of Operations & HSSE
Olympic Pipeline Company
30 S. Wacker Drive
Chicago, IL 60606

CPF 5-2021-018-NOA

Dear Mr. D'Andrea:

On December 14 through 18, 2020, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Washington Utilities and Transportation Commission (WUTC), pursuant to Chapter 601 of 49 United States Code, inspected Olympic Pipeline Company's (Olympic) procedures for control room operations in Renton, Washington.

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

1. §195.446 Control room management.

(a)...

(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1) ...

(5) The roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers.

Olympic's control room management procedures are inadequate to assure safe operation of a pipeline facility. Specifically, its procedures fail to adequately define the roles, responsibilities, and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers during normal, abnormal and emergency operating conditions.

Olympic's Control Room Management Procedure # P-195.446, Pipeline Control Room Personnel Roles, Authorities and Responsibilities does not define the roles, responsibilities and qualifications of the "Shift Leader," an individual who has authority to direct or supersede the specific technical actions of controllers. Olympic must define the roles, responsibilities, and qualifications of the Shift Leader(s) in the Control Room Management Procedure # P-195.446, Pipeline Control Room Personnel Roles, Authorities and Responsibilities.

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 30 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 Olympic maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Dustin Hubbard, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please

refer to **CPF 5-2021-018-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Dustin Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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

cc: PHP-60 Compliance Registry
PHP-500 J. Dunphy (#20-187752)