

## WARNING LETTER

### VIA E-MAIL TO MR. SHAWN LYON

August 26, 2021

Mr. Shawn Lyon  
President  
Marathon Pipe Line  
539 South Main Street  
Findlay, OH 45840

CPF 5-2021-036-WL

Dear Mr. Lyon:

From June 22, 2021 through June 23, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected your Fuel Gas Line from the Los Angeles Refinery to the Sulfur Recovery Plant in Los Angeles, California.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

**1. §192.743 Pressure limiting and regulating stations: Capacity of relief devices.**

**(c) If a relief device is of insufficient capacity, a new or additional device must be installed to provide the capacity required by paragraph (a) of this section.**

Pressure limiting devices must have sufficient capacity to protect the facilities to which they are connected. This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations. No pressure limiting devices were present on the pipeline system. If operational parameters prevent the system from overpressuring, no records were provided to demonstrate this was the case.

**2. §191.17 Transmission systems; gathering systems; liquefied natural gas facilities; and underground natural gas storage facilities: Annual report.**

**(a) *Transmission or Gathering.* Each operator of a transmission or a gathering pipeline system must submit an annual report for that system on DOT Form PHMSA 7100.2.1. This report must be submitted each year, not later than March 15, for the preceding calendar year, except that for the 2010 reporting year the report must be submitted by June 15, 2011.**

Complete and accurate annual reports utilizing the most recent DOT Form PHMSA 7100.2.1 must be submitted each year. If an operator discovers an error in a submitted annual report, a supplemental report should be filed. Review of the 2019 and 2020 annual reports showed total pipeline mileage listed as 0.5 miles. PHMSA representatives believe the correct pipeline length for the Fuel Gas Line should be larger than 0.5 miles as the line should be regulated all the way from the knock out drum in the Los Angeles Refinery to the end of the line in the Sulfur Recovery Plant.

**3. §192.479 Atmospheric corrosion control: General.**

**(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.**

Any portion of the pipeline that is exposed to the atmosphere must be adequately cleaned and coated. Coating material must be suitable for the prevention of atmospheric corrosion. Certain sections of the Fuel Gas Line need to be cleaned and re-coated, especially the line segment within the Los Angeles Refinery (LAR) that is downstream of the knock out drum that Marathon Pipe Line incorrectly considers to be non-regulated.

**4. §192.465 External corrosion control: Monitoring.**

**(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.**

Review of structure PS, structure IRFO, and native readings showed adequate external corrosion control monitoring for only the 0.5 mile portion of the Fuel Gas Line. However, the entire line needs to be under cathodic protection and external corrosion control monitoring, including the line segment extending back to the knock out drum in the Los Angeles Refinery.

**5. §192.147 Flanges and flange accessories.**

**(a) Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 (incorporated by reference, see §192.7), or the equivalent.**

Operator had numerous areas where they did not follow ASME B16.5 Pipe Flanges and Flanged Fittings which is incorporated by reference in §192.7(c)(2). The equations used in this Nonmandatory Appendix are for calculated bolt lengths established to ensure full thread engagement of heavy hexagon nuts when

worst case tolerances occur on all relevant dimensions of the flanged joint. The use of shorter bolt lengths is acceptable provided that full thread engagement is obtained at assembly (see paragraph 6.10.2).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Marathon Pipe Line being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2021-036-WL**. 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).

Sincerely,

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

cc: PHP-60 Compliance Registry  
PHP-500 J. Gilliam, J. Luo (#21-199494)