



March 28, 2022

VIA OVERNIGHT DELIVERY

Mr. Robert Burrough
Regional Director, Eastern Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
Suite 300
820 Bear Tavern Road
West Trenton, NJ 08628

RE: CPF 1-2022-037-NOA, Notice of Amendment (NOA)

Dear Director Burrough:

Kinder Morgan Liquids Terminals, LLC (KMLT) received the above referenced CPF NOA letter, dated March 15th, 2022. The NOA states that the agency identified two procedures as being inadequate following an inspection at the KMLT's Cincinnati and Dayton, Ohio, Indianapolis, Indiana and Argo and Wood River, Illinois as follows:

1. §195.402 (c)(3) 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.

KMLT's procedures for maintenance and normal operations were inadequate to ensure safe operation of a pipeline facility. Specifically, KMLT's T-O&M 903 External Corrosion Control for Buried or Submerged Pipelines, dated 01/13/21 (Corrosion Manual) failed to require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under § 195.402(c)(3) for which they are responsible for insuring compliance in accordance with § 195.5551.

KMLT's Corrosion Manual Section 3.1 stated in part:

Supervisors and personnel responsible for insuring compliance with the corrosion control processes in this procedure shall maintain a thorough knowledge of corrosion processes and these procedures through means such as:

- Reviewing this procedure during annual corrosion team meetings or individually if team meetings are not possible. Refer to T-O&M Procedure 003, Procedure Review.
- Attending National Association of Corrosion Engineers Training Courses
- Attending/completing other industry recognized corrosion courses
- On the job application of the procedures

- In-house corrosion training and presentations

However, the Corrosion Manual failed to provide details on how KMLT verifies that supervisors maintain a thorough knowledge of the corrosion control procedures. Furthermore, the Corrosion Manual failed to explicitly require that supervisors review the procedures for which they are responsible for.

Therefore, KMLT failed to require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under § 195.402(c)(3) for which they are responsible for insuring compliance in accordance with § 195.555. KMLT must revise its procedures to address this requirement.

KMLT Response: KMLT has revised the attached T-O&M 903 to address the agency's concerns. For your convenience a marked up copy of the procedure has been provided.

2. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(f) Safety-related condition reports. The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 195.55.

KMLT's procedures for safety-related conditions were inadequate to ensure safe operation of a pipeline facility. Specifically, KMLT's T-O&M 214 Reporting Pipeline Safety-Related Conditions, dated 05/27/21 (SRC Procedure) failed to include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 195.55.2

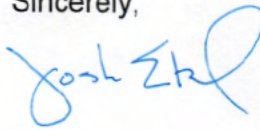
While the SRC Procedure did include a process for reporting safety-related conditions, it did not include adequate instructions for operations and maintenance personnel to recognize conditions that may be safety-related conditions. When PHMSA requested additional information regarding instructions enabling personnel to recognize safety-related conditions, KMLT could not provide anything further.

Therefore, KMLT failed to include instructions in its written procedures enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions in accordance with § 195.402(±). KMLT must revise its procedures to address this requirement.

KMLT Response: KMLT has revised the attached T-O&M 214. For your convenience a marked up copy of the procedure has been provided.

KMLT is committed to operating our terminals and pipeline systems safely and in compliance with all applicable regulations. If you have further questions, please feel free to contact myself at 732-969-5753 or Danielle Stephens, Manager - Compliance, Codes and Standards at 713.725.0147.

Sincerely,



Joshua A. Etzel
Vice President - Terminals
Northern Region

cc: James E. Holland
John W. Schlosser
William P. Brown
Mary Clair Lyons

Attachments

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