

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

November 17, 2022

Mr. John Gillies
President
Portland Pipe Line Corporation
30 Hill Street
South Portland, Maine 04106

CPF 1-2022-072-NOA

Dear Mr. Gillies:

From July 6, 2021, through July 30, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Portland Pipe Line Corporation's (Portland) procedures for control room management of its South Portland, Maine control room.

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

1. § 195.446 Control Room Management

(a) ...

(e) Alarm Management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations.

Portland's control room management program procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Portland's written control room management program procedures for reviewing SCADA safety-related alarm operations failed to include a process that ensures alarms are accurate and support safe pipeline operations as required by § 195.446(e)(1).

During the inspection, PHMSA asked Portland Pipeline to produce procedures that demonstrate how Portland ensures that alarms are accurate and support safe pipeline operations. Portland initially referred to its *Portland Montreal Pipe Line Control Room Management Procedures (CRM) (CRM Procedures)*, Section 5.1, Review SCADA Safety Related Alarm Operations. This section stated that the Operations Manager will take steps necessary to review SCADA safety alarm operations to ensure alarms received and displayed to the Controller are accurate and support safe pipeline operations. The section did not describe a process for achieving this objective. The procedures failed to include details such as a process for identifying, tracking and correcting inaccurate or malfunctioning alarms, process considerations for safety related alarms to account for different alarm designs or alarm types, and/or specific procedures for managing stale or unreliable data.

Portland later referred to Section 6 Alarm Handling Methods of its *PMPL Alarm Management Program, SCADA Alarm Management*, Rev 1, May 2012 (PMPL Alarm Plan). However, this section lacked sufficient details to adequately address how Portland ensures that alarms are accurate and support safe pipeline operations.

Therefore, Portland's written control room management program procedures and alarm management procedures were inadequate as they lacked sufficient details for complying with § 195.446(e)(1). Portland must revise its control room management program procedures to address this deficiency.

2. § 195.446 Control Room Management

(a) ...

(e) Alarm Management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1) ...

(2) Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities;

Portland's control room management program procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Portland's alarm management plan failed to include adequate provisions for conducting the monthly identification of points affecting safety required by § 195.446(e)(2).

During the inspection, PHMSA asked Portland to produce procedures addressing a monthly identification of points that have been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities. Portland referred to its CRM Procedures, Section 5.2, Review of SCADA Points. This section discussed a process for identifying, at least once each calendar month, the alarm points affecting safety that have been taken off scan in the SCADA

host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities. However, the CRM Procedures failed to cross-reference or mention the SCADA Monthly Checklist located in the PMPL Alarm Plan, Appendix 13.5, which lists all the activities for checking alarms. Furthermore, the PMPL Alarm Plan lacked a specific procedure for using the SCADA Monthly checklist. Thus, instead of a monthly review, Portland stated during the inspection that it just reviews a snapshot of the SCADA screen on a day and notes anything off scan, inhibited and forced/manual. There is no report of what was identified or details on subsequent follow up actions.

Therefore, Portland's control room management program procedures were inadequate as they lacked specific details about how to conduct the monthly reviews pursuant to § 195.446(e)(2). Portland must clarify the process or procedure for using the SCADA Monthly Checklist and subsequent report the subsequent actions.

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 Enforcement 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 Portland Pipe Line Corporation maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2022-072-NOA** and, for each document you submit, please provide a copy in electronic format

whenever possible. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings