



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

March 16, 2023

Mr. Dave Wortman
Vice President, Supply and Transportation
Kiantone Pipeline Corp.
15 Bradley Street
PO BOX 780
Warren, Pennsylvania 16365

CPF 1-2023-012-NOA

Dear Mr. Wortman:

From April 25, 2022 through May 20, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) conducted an inspection of Kiantone Pipeline Corp.'s (Kiantone) procedures and records in Warren, Pennsylvania.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within Kiantone's plans or procedures. The items inspected and the inadequacies are described below:

1. **49 C.F.R. § 195.64 National Registry of Operators.**
 - (a) ...
 - (c) **Changes.** Each operator must notify PHMSA electronically through the National Registry of Operators at <https://portal.phmsa.dot.gov>, of certain events.
 - (1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:
 - (i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs \$10 million or more. If 60-day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;

- (ii) Construction of 10 or more miles of a new or replacement hazardous liquid or carbon dioxide pipeline;
- (iii) Reversal of product flow direction when the reversal is expected to last more than 30 days. This notification is not required for pipeline systems already designed for bi-directional flow; or
- (iv) A pipeline converted for service under § 195.5, or a change in commodity as reported on the annual report as required by § 195.49.

Kiantone's procedures for maintenance and normal operations were inadequate. Specifically, Operations, Maintenance & Emergency Response Procedures Manual, dated 03/07/22 (OME) failed to include a procedure for complying with the § 195.64(c) requirements for notifying PHMSA of changes through the National Registry of Operators.

During the inspection, PHMSA requested Kiantone's procedures regarding the National Registry of Operators. Kiantone discussed that these processes were not included in any procedure.

Therefore, Kiantone's procedures to include requirements for notifying PHMSA of changes through the National Registry of Operators in accordance with § 195.64(c). Kiantone must revise its procedures to address this requirement.

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

(a) ...

(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:

(1) ...

(3) **Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

Kiantone's procedures for maintenance and normal operations were inadequate. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual*, dated 03/07/22 (OME) failed to provide details on how its firefighting equipment inspections are conducted, in accordance with § 195.430(a).

Section 195.430 states that "Each operator shall maintain adequate firefighting equipment at each pump station and breakout tank area. The equipment must be- (a) In proper operating condition at all times".

During the inspection, PHMSA requested Kiantone's procedures regarding its firefighting equipment inspections. Kiantone provided the OME Section 14.3 and discussed the inspection intervals listed in the table. However, the OME failed to state how these inspections are conducted, where they are maintained and how they are documented. When PHMSA requested additional information, Kiantone discussed that they follow the NFPA Standards for criteria, but the criteria were not referenced or listed in the procedures.

Therefore, Kiantone's procedures failed to provide details on how its firefighting equipment inspections are conducted, in accordance with § 195.430. Kiantone must revise its procedures to address this requirement.

3. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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:

(1) ...

(3) ***Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.***

Kiantone's procedures for maintenance and normal operations were inadequate. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual, dated 03/07/22* (OME) failed to include details on remedial action to ensure the safe operation of a pipeline following an extreme weather event under § 195.414.

Section 195.414(d) states:

Remedial action. An operator must take prompt and appropriate remedial action to ensure the safe operation of a pipeline based on the information obtained as a result of performing the inspection required under paragraph (a) of this section. Such actions might include, but are not limited to:

- (1) Reducing the operating pressure or shutting down the pipeline;
- (2) Modifying, repairing, or replacing any damaged pipeline facilities;
- (3) Preventing, mitigating, or eliminating any unsafe conditions in the pipeline right-of-way;
- (4) Performing additional patrols, surveys, tests, or inspections;
- (5) Implementing emergency response activities with Federal, State, or local personnel; and
- (6) Notifying affected communities of the steps that can be taken to ensure public safety.

During the inspection, the PHMSA inspector requested Kiantone's procedures regarding remedial actions following extreme weather events. Kiantone provided the OME Section 13.2.

However, the procedure repeated the language of § 195.414(d) and failed to indicate any procedure, process, instructions or details on selecting, employing, and documenting the appropriate remedial actions in the case of an extreme weather event.

Therefore, Kiantone failed to include details on remedial actions to ensure the safe operation of a pipeline following an extreme weather event in accordance with § 195.414(d). Kiantone must revise its procedures to address this requirement.

4. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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:

(1) ...

(3) **Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

Kiantone's procedures for maintenance and normal operations were inadequate. Specifically, Kiantone's *Operations, Maintenance and Emergency Manual*, Section 11 Inspection of Breakout Tanks, dated 03/07/22 (OME) and *United Refining Company – PA DEP In-Service and Out-of-Service Tank Inspections Procedure*, dated 05/30/02 (URC Procedure) failed to describe the interval and method for performing external inspections of breakout tanks per the requirements of § 195.432(b).

Section § 195.432(b) states:

Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel above-ground breakout tanks according to API Std 653 (except section 6.4.3, Alternative Internal Inspection Interval) (incorporated by reference, see §195.3). However, if structural conditions prevent access to the tank bottom, its integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3). The risk-based internal inspection procedures in API Std 653, section 6.4.3 cannot be used to determine the internal inspection interval.

API Standard 653 – Section 6.3.2.1 states in part:

All tanks shall be given a visual external inspection by an authorized inspector. This inspection shall be called the external inspection and must be conducted at least every 5 years or RCA/4N years (where RCA is the difference between the measured shell thickness and the minimum required thickness in mils, and N is the shell corrosion rate in mils per year) whichever is less. Tanks may be in operation during this inspection.

During the inspection, PHMSA requested Kiantone's procedures regarding external breakout tank inspections. Kiantone provided the OME Section 11 and the URC Procedure. The URC Procedure stated in part, "The inspections performed on the Kiantone Breakout Tanks located in Pennsylvania (647 and 648 Tanks) are included in this procedure to meet the requirements of Part 195.432, which requires inspection in accordance with API 653 Section 6."

However, the OME failed to reference the appropriate URC procedure used for external inspections in Pennsylvania. When the PHMSA inspector asked Kiantone which procedure was used for external inspections, Kiantone discussed how they reference API 653 in-service and out-of-service tank inspections. Additionally, the URC Procedure failed to reference the appropriate jurisdictional breakout tanks (650, 651 and 652) for inspection located in Pennsylvania.

Therefore, Kiantone's procedures failed to describe the interval and method for performing external inspections of breakout tanks, in accordance with § 195.432(b). Kiantone must revise its procedures to address this requirement.

5. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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:

(1) ...

(3) *Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.*

Kiantone's procedures for maintenance and normal operations were inadequate to assure safe operation of a pipeline facility. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual, dated 03/07/22* (OME) and *United Refining Company – PA DEP In-Service and Out-of-Service Tank Inspections Procedure, dated 05/30/02* (URC Procedure) failed to describe the interval and method for performing external ultrasonic thickness inspections of breakout tanks per the requirements of § 195.432(b).

Section § 195.432(b) states:

Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel above-ground breakout tanks according to API Std 653 (except section 6.4.3, Alternative Internal Inspection Interval) (incorporated by reference, see §195.3). However, if structural conditions prevent access to the tank bottom, its integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3). The risk-based internal inspection procedures in API Std 653, section 6.4.3 cannot be used to determine the internal inspection interval.

API Standard 653 – Section 6.3.3.2 states in part regarding Ultrasonic Thickness Inspection:

When the corrosion rate is not known, the maximum interval shall be 5 years. Corrosion rates may be estimated from tanks in similar service based on thickness measurements taken at an interval not exceeding 5 years. When the corrosion rate is known, the maximum interval shall be the smaller of $RCA/2N$ years (where RCA is the difference between the measured shell thickness and the minimum required thickness in mils, and N is the shell corrosion rate in mils per year) or 15 years.

During the inspection, PHMSA requested Kiantone's procedures regarding external ultrasonic thickness breakout tank inspections. Kiantone provided the OME Section 11 and the URC Procedure. The URC Procedure stated in part, "The inspections performed on the Kiantone Breakout Tanks located in Pennsylvania (647 and 648 Tanks) are included in this procedure to meet the requirements of Part 195.432, which requires inspection in accordance with API 653 Section 6", and "Thickness measurements using ultrasonic equipment, shall be obtained at a

minimum at the following specified TML's (Thickness Measurement Locations) to establish the required corrosion rate calculations...”

However, the OME failed to reference the appropriate URC procedure used for external ultrasonic thickness inspections in Pennsylvania. When the PHMSA inspector asked Kiantone which procedure was used for external ultrasonic thickness inspection, Kiantone discussed how they reference API 653 in-service and out-of-service tank inspections. The URC procedure discussed the inspection frequency for external inspections of breakout tanks, not external ultrasonic thickness inspections. When PHMSA re-requested the procedures relevant to conducting ultrasonic thickness inspections, Kiantone did not have a response. Additionally, the URC Procedure failed to reference the appropriate jurisdictional breakout tanks (650, 651 and 652) for inspection located in Pennsylvania.

Therefore, Kiantone’s procedures failed to describe the interval and method for performing external ultrasonic thickness inspections of breakout tanks, in accordance with § 195.432(b). Kiantone must revise its procedures to address this requirement.

6. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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:

(1) ...

(3) *Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.*

Kiantone’s procedures for maintenance and normal operations were inadequate. Specifically, Kiantone’s *Operations, Maintenance and Emergency Manual, Section 11 Inspection of Breakout Tanks, dated 03/07/22* (OME) and *United Refining Company – PA DEP In-Service and Out-of-Service Tank Inspections Procedure, dated 05/30/02* (URC Procedure) failed to describe the interval and method for performing internal inspections of breakout tanks per the requirements of § 195.432(b).

Section § 195.432(b) stated:

Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel above-ground breakout tanks according to API Std 653 (except section 6.4.3, Alternative Internal Inspection Interval) (incorporated by reference, see §195.3). However, if structural conditions prevent access to the tank bottom, its integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3). The risk-based internal inspection procedures in API Std 653, section 6.4.3 cannot be used to determine the internal inspection interval.

API Standard 653 – Section 6.4.1.2 stated in part, “All tanks shall have a formal internal inspection conducted at the intervals defined by 6.4.2 or 6.4.3.” API Standard 653 – Section 6.4.2.2 stated in part, “When corrosion rates are not known and similar service experience is not available to estimate the bottom plate minimum thickness at the next inspection, the internal inspection interval shall not exceed 10 years.”

During the inspection, PHMSA requested Kiantone’s procedures regarding internal breakout tank inspections. Kiantone provided the OME Section 11 and the URC Procedure. The URC Procedure stated in part, “The inspections performed on the Kiantone Breakout Tanks located in Pennsylvania (647 and 648 Tanks) are included in this procedure to meet the requirements of Part 195.432, which requires inspection in accordance with API 653 Section 6.”

However, the OME failed to reference the appropriate URC procedure used for internal inspections in Pennsylvania. When the PHMSA inspector asked Kiantone which procedure was used for internal inspections, Kiantone discussed how they reference API 653 in-service and out-of-service tank inspections. Additionally, the URC Procedure failed to reference the appropriate jurisdictional breakout tanks (650, 651 and 652) for inspection located in Pennsylvania. The URC Procedure also failed to indicate how internal inspections are conducted per the requirements in API 653 Section 6.4.2.2.

Therefore, Kiantone’s procedures failed to describe the interval and method for performing internal inspections of breakout tanks, in accordance with § 195.432(b). Kiantone must revise its procedures to address this requirement.

7. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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:

(1) ...

(3) *Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.*

Kiantone's procedures for maintenance and normal operations were inadequate to ensure safe operation of a pipeline facility. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual*, dated 03/07/22 (OME) failed to require and include a process to 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.

Kiantone's OME Section 15.1 stated in part:

All tests, surveys, inspections, and maintenance procedures described or referenced in this section shall be performed by, or supervised by, personnel qualified by either training or experience with cathodic protection systems and related testing equipment. URC corrosion personnel will be NACE certified, and also routinely

attend continuing education meetings, trainings, seminars, etc. Records for each URC corrosion employee will be kept on file.

However, the OME failed to provide procedures or documentation addressing how Kiantone verifies that supervisors maintain a thorough knowledge of Kiantone's specific corrosion control procedures. Furthermore, the OME failed to explicitly require that supervisors review the procedures for which they are responsible for.

Therefore, Kiantone's procedures failed to require and include a process to 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. Kiantone must revise its procedures to address this requirement.

8. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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:

(1) ...

(3) *Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.*

Kiantone's procedures for maintenance and normal operation were inadequate. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual, dated 03/07/22* (OME) failed to include a description or details of its methodology for evaluating the severity of coating and atmospheric corrosion deficiencies of pipe inspected pursuant to § 195.583, and for documenting these inspections.

During the inspection, PHMSA requested Kiantone's procedure for atmospheric corrosion inspections. Kiantone provided the OME Section 15.5. Kiantone's OME Section 15.5 stated in part:

Kiantone inspects each pipeline or portion of pipeline exposed to the atmosphere for evidence of atmospheric corrosion once every three years, with intervals not exceeding 39 months. During inspections, particular attention is given to soil-to-air interfaces, underneath disbanded coatings, at pipe supports, in spans over water (if applicable), and under thermal insulation (if present) for evidence of corrosion.

Any conditions that require remediation that are noted in an inspection will be remediated as soon as practical, but before the next atmospheric corrosion survey/inspection is due (every three years, not to exceed 39 months). Remediation will be prioritized based on severity and zone/location.

While the OME did identify what conditions require remediation, it failed to include any

procedures for evaluating the existence or severity of these coating and atmospheric corrosion conditions for the purposes of requiring or prioritizing remediation. The OME also failed to include any procedures or processes addressing how the atmospheric corrosion inspection is documented and retained. When PHMSA requested if there were additional procedures or guidance related to atmospheric corrosion, Kiantone stated that the specifics are not laid out in the procedure and that the third-party contractor conducts the inspections.

Therefore, Kiantone's procedures failed to include a description or details of its methodology for evaluating the severity of coating and atmospheric corrosion deficiencies of pipe inspected pursuant to § 195.583, and for documenting these inspections. Kiantone must revise its procedures to address this deficiency.

9. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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:

(1) ...

(13) Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

Kiantone's procedures for maintenance and normal operations were inadequate. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual, dated 03/07/22* (OME) failed to provide details on periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

During the inspection, the PHMSA inspector requested Kiantone's procedures regarding § 195.402(c)(13). Kiantone provided its OME Section 1.6. However, Kiantone's OME did not provide any procedures addressing when the effectiveness reviews are conducted, how they are performed or how they are documented.

Therefore, Kiantone failed to include details in its written procedures on periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures in accordance with § 195.402(c)(13). Kiantone must revise its procedures to address this requirement.

10. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(e) *Emergencies.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs:

(1) ...

(9) Providing for a post-accident review of employee activities to determine whether the procedures were effective in each emergency

and taking corrective action where deficiencies are found.

Kiantone's procedures for emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual*, dated 03/07/22 (OME) failed to include processes to provide a post-accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective actions where deficiencies are found.

During the inspection, PHMSA requested Kiantone's procedures regarding the § 195.402(e)(9) requirements. Kiantone discussed that they have a post-accident review form, but do not have any specific procedures related to this requirement.

Therefore, Kiantone's procedures failed to include review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found, in accordance with § 195.402(e)(9). Kiantone must revise its procedures to address this requirement.

11. § 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.

Kiantone's procedures for safety related condition reports were inadequate. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual*, dated 03/07/22 (OME) failed to include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions (SRCs) that are subject to the reporting requirements of § 195.55.

During the inspection, the PHMSA inspector requested Kiantone's procedure regarding recognizing SRCs. Kiantone provided the OME Section 3 (SRC Procedures). Section 3 presented Kiantone's definition of SRCs, which matched the list of SRCs found in § 195.55(a). It also stated that the employee training program is its method of ensuring employees can recognize potential SRCs and referenced Section 1.7 of the OME. Section 1.7 of the OME stated that the employee training program includes training that may address topics including a review of the definition of SRCs, examples and case studies, and the DOT reporting requirements.

However, Kiantone was unable to demonstrate that the SRC Procedures or the employee training program provided instructions for personnel to recognize conditions that potentially may be SRCs. The SRC Procedures lacked any criteria and/or examples that would allow Kiantone personnel to differentiate between what is and what is not a potential safety-related condition. When the PHMSA inspector re-requested information related to § 195.55, Kiantone discussed the information is in the training program, but is not specifically spelled out. Kiantone was unable to clarify or demonstrate where in the training program the recognition of SRCs is addressed.

Therefore, Kiantone failed to include instructions in its written procedures for personnel to recognize conditions that potentially may be safety-related conditions in accordance with § 195.402(f). Kiantone must revise its procedures to address this requirement.

12. § 195.403 Emergency response training.

(a) ...

(c) Each operator shall require and verify that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under 195.402 for which they are responsible to ensure compliance.

Kiantone's procedures for emergency response training were inadequate to ensure safe operation of a pipeline facility. Specifically, Kiantone's *Operations, Maintenance & Emergency Response Procedures Manual, dated 03/07/22* (OME) failed to require and include a process to verify that supervisors be knowledgeable of emergency response procedures for which they are responsible for per the requirements of § 195.403(c).

During the inspection, PHMSA requested Kiantone's procedures regarding emergency response supervisor training. Kiantone provided the OME. Section 19.3 of the OME stated in part:

Kiantone personnel receive training in the use of Company emergency response procedures. The training includes "table-top" discussions of emergency scenarios. In addition, Kiantone ensures that supervisors and First Responders have received training to demonstrate competency in the following areas...

Simulated emergency response drills are normally conducted twice per year, but at least annually, to further ensure appropriate actions in the event of an emergency. Drills are planned to prevent injury or damage. Third parties such as emergency responders, public officials, and external agencies may be invited to observe and participate in the drill(s). Records of the training exercise should be documented on Form 19.3.2, Emergency Response Training Exercise.

However, the OME failed to include procedures or details addressing how the drills or other means are used to verify Kiantone's supervisors are knowledgeable of applicable emergency response procedures for which they are responsible to ensure compliance.

Therefore, Kiantone's procedures failed to require and include a process to verify that supervisors are knowledgeable of emergency response procedures for which they are responsible for, in accordance with § 195.403(c). Kiantone must revise its procedures to address this requirement.

Response to this Notice

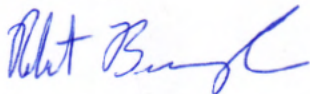
This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Compliance Proceedings.

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 Kiantone Pipeline Corp. 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. In correspondence concerning this matter, please refer to **CPF 1-2023-012-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Burrough", is positioned above the printed name.

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

cc: John Wagner, Vice President, General Counsel and Corporate Secretary, United Refining Company; jwagner@urc.com

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings