



Toledo Refining Company LLC
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March 13, 2024

Mr. Robert Burrough, Director, Eastern Region
U.S. Department of Transportation
Pipeline and Hazardous Material Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

***Re: Toledo Refining Company LLC Notice of Amendment
Response CPF 1-2024-005-NOA***

Director Burrough:

Toledo Refining Company LLC (TRC) has received the Notice of Amendment (NOA), referenced above, issued by the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA), on February 15th, 2024. PHMSA conducted an on-site inspection of TRC's control room management procedures and records of its Woodville Pipeline Control Room in Toledo, Ohio from July 25 to July 29th, 2022. TRC is writing to respond to the NOA.

TRC appreciates the opportunity to learn from the findings of PHMSA's inspection. TRC operates with the philosophy that with every inspection, whether internal or external, there is value in the exchange of information and within the dialogue between inspectors and TRC and that this "value" can be utilized to drive continuous improvement to our processes. We make every effort to ensure compliance with the pipeline safety regulations, and do not take any inspection report or citation lightly. We seek to learn from the inspection reports and implement changes to prevent incidents.

By submitting this response to the NOA, TRC does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

Notice of Amendment #1

1. § 195.446 Control Room Management.

(a)

(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

(1) Responding to abnormal operating conditions likely to occur simultaneously or in sequence.

TRC's control room management training program procedures were inadequate to assure safe operation of a pipeline facility. Specifically, TRC's training program failed to include elements

to train each controller to respond to abnormal operating conditions that are likely to occur simultaneously or in sequence pursuant to 195.446(h)(l).

During the inspection, PHMSA requested training procedures and documentation relevant to 195.446(h)(l). TRC referred to its *Control Room Management Manual* (CRM Manual), Section 9 Training. This section repeated the regulations but did not provide any training details or a list of abnormal operating conditions likely to occur simultaneously or in sequence.

TRC's training program procedures failed to include elements for responding to abnormal operating conditions that are likely to occur simultaneously or in sequence and, therefore, were inadequate to assure pipeline safety. TRC must revise its procedures to include details of its training program for complying with § 195.446(h)(l).

TRC Response to NOA #1

TRC does not contest the findings for this section. TRC has updated section 9 of the TRC Control Room Management Procedure to include the required information described in the finding.

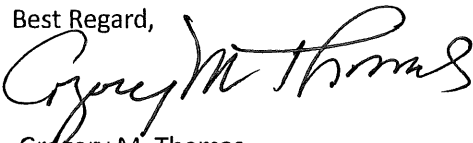
Specifically, TRC has amended Section 9 of its CRM Manual (enclosed TRC CRM Manual). It includes references to the TRC DOT Abnormal Operating conditions listed in each of the TRC DOT written procedures available to TRC operators and covered in the Controller's Basic Operations Training for the Controller position in the control room.

The changes will be documented further by using TRC e-MOC Management of Change to document the changes listed here and include a roster of all affected personnel.

Please know that PHMSA has our full attention and cooperation. TRC is proud of its commitment to continuous improvement and trust that our enclosed response demonstrates that commitment. We believe this response will demonstrate our desire to be in full compliance with both the letter and the spirit of safety regulations.

Thank you for your consideration, and we look forward to working with PHMSA to ensure safe operation of our pipelines. If you have any questions about the response, then please do not hesitate to contact me.

Best Regard,



Gregory M. Thomas
Sr. DOT Compliance Coordinator
Toledo Refining Company LLC

Enclosures

CC:

Mike Gudgeon, Refinery Manager
Debra Overton, Business Team Lead, TRC
Dane Holbrook, Assistant General Counsel, PBF Holding Company LLC