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

VIA ELECTRONIC MAIL TO: matthew.lucey@pbfenergy.com

March 16, 2026

Mr. Matthew Lucey
Chief Executive Officer and President
PBF Energy Inc.
1 Sylvan Way, 2nd Floor
Parsippany, New Jersey 07054

CPF 1-2026-007-NOA

Dear Mr. Lucey:

From December 4, 2023 to March 15, 2024 of the on-site inspection, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Collins Pipeline Company's (Collins Pipeline)[1] control room procedures in Woodlands, Texas.

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

1. § 195.446 Control room management

(a) …

(b) *Roles and responsibilities*. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1) …

(4) A method of recording controller shift-changes and any hand-over of responsibility between controllers;

[1] Collins Pipeline Company is a subsidiary of PBF Energy, Inc.

Collins Pipeline's written control room management procedures were inadequate to assure safe operation of a pipeline facility. Specifically, Collins Pipeline's CRM Plan[2] failed to include an adequate shift handover process when the outgoing controller is unable to complete their scheduled shift in accordance with section 195.446(b)(4).

The CRM Plan, section F8, stated that "[i]n the event a Controller is unable to complete their scheduled shift; it is the responsibility of the Controller to notify the Control Room Supervisor or designee." In addition, the CRM Plan stated that "[t]he outgoing controller will record 'Mid' in the 'Shift' field on the Controller Shift Change Checklist on the green sheet." However, the CRM Plan failed to identify how the console is managed (shutdown or monitored) while a replacement is found, and how to proceed if the outgoing controller is unable to fulfill the outgoing responsibilities in section F3.

Therefore, Collins Pipeline's written control room management procedures were inadequate to ensure safe operation of a pipeline facility in accordance with section 195.446(b)(4). PHMSA proposes that Collins Pipeline revise its written control room management procedures to include a shift handover process that addresses how the console is managed (shutdown or monitored) while a replacement is found, and how to proceed if the outgoing controller is unable to fulfill the outgoing responsibilities in section F3.

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) …

(4) Review the alarm management plan required by this paragraph at least once each calendar year, but at intervals not exceeding 15 months, to determine the effectiveness of the plan;

Collins Pipeline's written control room management procedures were inadequate to assure safe operation of a pipeline facility. Specifically, Collins Pipeline's CRM Plan failed to include an adequate process to review the alarm management plan to determine the effectiveness of the plan at least once a calendar year but at intervals not exceeding 15 months in accordance with section 195.446(e)(4).

Collins Pipeline's CRM Plan, sections A7 and M2.15 required an annual review of the alarm management plan. However, the CRM Plan failed to include adequate details regarding the annual review process. The CRM Plan failed to detail data sources, key performance indicators, effectiveness evaluation methods, decision criteria, documentation requirements, and corrective action procedures.

Therefore, Collins Pipeline's written control room management procedures were inadequate to assure safe operation of a pipeline facility in accordance with section 195.446(e)(4). PHMSA

[2] *PBF Logistics Pipeline Control Center: Control Room Management Plan*, *Rev-8* (08/25/23) (CRM Plan).

proposes that Collins Pipeline revise its written control room management procedures to establish a detailed process for reviewing the effectiveness of the alarm management plan. This includes defining data sources, key performance indicators, evaluation methods, decision criteria, documentation standards, and corrective action procedures.

3. § 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) …

(5) Monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms; and

Collins Pipeline's written control room management procedures were inadequate to assure safe operation of a pipeline facility. Specifically, Collins Pipeline's CRM Plan failed to provide a process for effective monitoring of the content and volume of general activity being directed to and required of each controller at least once a calendar year but at intervals not exceeding 15 months in accordance with section 195.446(e)(5).

Collins Pipeline's CRM Plan, sections A6.8 and M2.15 required an annual review of the content and volume of general activity being directed to and required of each controller. However, the CRM Plan failed to include adequate details regarding this annual review process. The CRM Plan stated that the review will be monitored with a special application without describing it or how it functioned in the workload study analysis. Section A6.8 stated that Collins Pipeline "will strive for Controller availability percentage greater than 60%," but failed to specify what this percentage measured, how it was calculated, what activities were included in the measurement, or how the results will be evaluated or acted upon if thresholds are not met. The CRM Plan also failed to include documentation requirements for this annual review or specify how the results would be used to reduce controller workload.

Therefore, Collins Pipeline's written control room management procedures were inadequate to ensure safe operation of a pipeline facility in accordance with section 195.446(e)(5). PHMSA proposes that Collins Pipeline revise its written control room procedures to establish a data-driven process for analyzing controller workload and its impact on alarm response times. This includes defining metrics, specifying how data is collected and analyzed, outlining corrective actions when deficiencies are found, and documenting findings.

4. § 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) …

(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.

Collins Pipeline's written control room management procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Collins Pipeline's CRM Plan failed to include adequate procedures to address deficiencies identified through the implementation of subsections 195.446(e)(1) through (e)(5) in accordance with section 195.446(e)(6).

Collins Pipeline's CRM Plan, section A6.9 stated that any deficiencies discovered through implementation of the CRM Plan procedures will be addressed and documented by the Control Room Supervisor or Designee. However, the CRM Plan failed to specify how deficiencies are to be evaluated, what constitutes an actionable deficiency, how corrective measures will be determined or prioritized, or how follow-up and verification of effectiveness will occur. Furthermore, the CRM Plan also failed to require that this process be documented or incorporated into future reviews and plan updates.

Therefore, Collins Pipeline's written control room management procedures were inadequate to ensure safe operation of a pipeline facility in accordance with section 195.446(e)(6). PHMSA proposes that Collins Pipeline revise its written control room management procedures to include define a process for identifying, analyzing, documenting, correcting, and verifying the resolution of deficiencies for each of the elements found under subsections 195.446(e)(1) through (e)(5). These procedures must include documentation requirements, timelines for action, criteria for evaluation, and a feedback loop to ensure continuous improvement.

5. § 195.446 Control room management.

(a) …

(g) *Operating experience*. Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:

(1) Review accidents that must be reported pursuant to § 195.50 and 195.52 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to:

(i) Controller fatigue;

(ii) Field equipment;

(iii) The operation of any relief device;

(iv) Procedures;

(v) SCADA system configuration; and

(vi) SCADA system performance.

Collins Pipeline's written control room management procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Collins Pipeline's CRM Plan failed to provide a process for reportable accident reviews to determine if control room actions contributed to the

event and, if so, correct, where necessary, deficiencies related controller fatigue, field equipment, the operation of any relief device, procedures, and SCADA system configuration and performance in accordance with section 195.446(g)(1)(i)-(vi).

Collins Pipeline's CRM Plan included multiple sections related to learning from experience but failed to include a process for reviewing reportable accidents and correcting related control room deficiencies:

- Section H2.2 mentioned continuous improvement and lessons learned but did not correlate those efforts to the systematic review of reportable accidents or required corrective actions based on such reviews.
- Section H4 included review metrics such as the number of lessons learned and drills but did not require evaluation of control room actions after reportable incidents to determine if they contributed to the event.
- Section S1 outlined general goals for collecting lessons learned from abnormal operating conditions, near misses, and DOT reports but did not include an adequate process for reviewing reportable accidents under sections 195.50 and 195.52.
- Section D7 included some investigation requirements following leaks or test failures, but it did not require an investigation of control room actions after reportable accidents. While it acknowledged the need to review procedures and consider controller fatigue, it did not establish a requirement to evaluate whether control room actions contributed to reportable accidents. Furthermore, it lacked a defined process to analyze and correct system-level deficiencies such as SCADA system configuration, procedural inadequacies, or controller response.

Collins Pipeline's written control room management procedures were inadequate to assure safe operation of a pipeline facility in accordance with section 195.446(g)(1). PHMSA proposes that Collins Pipeline revise its written control room management procedures to define a process for reviewing reportable accidents to determine if control room actions contributed to the accident considering the criteria in section 195.446(g)(1)(i)-(vi).

6. § 195.446 Control room management.

(a) …

(g) *Operating experience.* Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:

(1) …

(2) Include lessons learned from the operator's experience in the training program required by this section.

Collins Pipeline's written control room management procedures were inadequate to assure safe operation of a pipeline facility. Specifically, Collins Pipeline's CRM Plan failed to include a process that ensures lessons learned from the operator's experience are incorporated in the training program as required by section 195.446(g)(2).

Collins Pipeline's CRM Plan contained several sections that mention lessons learned and operating experience. These sections, however, did not establish a consistent, documented process for integrating lessons learned into controller training. For instance, Collins Pipeline failed to incorporate lessons learned from a 2021 reportable accident into its training program. Under the terms of the Corrective Action Order (CAO), Collins Pipeline was required to evaluate controller responses to all alarms occurring both immediately before and after the confirmation of that accident.[3]

Section E5 Continuous Improvement notes that opportunities for improvement will be integrated into procedures and training, but the process for how lessons are selected, reviewed, and incorporated into training is not defined. Section H2.2 assigns responsibility to the Control Room Supervisor or Designee for communicating lessons learned and improving processes. However, this section did not describe how those lessons are translated into training materials or instructional formats. Section H4 outlined performance metrics such as the number or lessons learned but did not describe how those lessons informed training design or execution.

Sections S1 and S2 referred to an Operating Experience Program and indicated sources of lessons learned, including AOCs, near misses and DOT reports. These sections identified that lessons were to be reviewed and disseminated. However, the process for incorporating those lessons into training were not detailed. For example:

- Section S2.1.4 stated that the Control Room Supervisor shall review reports and include lessons in training but did not specify how the training is updated, delivered, or documented.
- Section S2.1.5 stated that lessons learned "should be used" in various forums, but use of discretionary language and lack of documentation requirements did not provide assurance of consistent implementation.
- Section S1.3 assigned responsibilities for reporting lessons learned but did not define how or when this information is delivered to training personnel or integrated into course content.
- Section S3 addressed retention of lessons learned but did not ensure traceability between those lessons and updates made to the training program.

While the CRM Plan referenced multiple responsibilities and general expectations it did not include an actionable process for evaluating, selecting, integrating, and documenting lessons learned within the controller training program.

Therefore, Collins Pipeline's written control room management procedures were inadequate pursuant to section 195.446(g)(2). PHMSA proposes that Collins Pipeline revise its written control room management procedures to establish a defined and documented process for incorporating lessons learned into controller training, as required by section 195.446(g)(2).

Response to this Notice

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

[3] *See* Corrective Action Order, CPF No. 1-2021-077-CAO, Required Corrective Action 7 (Dec. 30, 2021).

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 49 CFR § 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 CFR § 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 Collins Pipeline Company 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 1-2026-007-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

cc: Thomas McLane, Director Logistics Regulatory Compliance, thomas.mclane@pbfenergy.com
Jeff Hersperger, Sr. Operations Director, jeffrey.hersperger@pbfenergy.com

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*