



Collins Pipeline Company
1330 Lake Robbins Drive
The Woodlands, TX 77380
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May 15, 2026

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

RE: Response to Notice of Amendment, Docket: CPF 1-2026-007-NOA

Dear Mr. Burrough,

On March 16, 2026, PBF Energy Inc (PBF) received a Notice of Amendment, Docket CPF 1-2026-007-NOA (NOA) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) resulting from a Collins Pipeline Company (CPC) control room management audit performed from December 4, 2023, to March 15, 2024. On April 13, 2026 CPC requested an extension of time to file its response. The extension was granted pursuant to a letter dated April 14, 2026, moving the due date to May 15, 2026.

Therefore, while Collins Pipeline maintains its Control Room Management (CRM) procedures addressed the subsections of 49 CFR §195.446, and supported the safe operation of its pipeline facilities, consistent with the company's Safety Management System and commitment to continuous improvement, without admission, CPC has revised the CRM plan accordingly. As a result, below is a list of each allegation from the NOA and then an attachment summarizing all the procedure changes for each allegation.

Item 1: §195.446(b)(4) Control Room Management

Collins Pipeline's written control room management procedures were inadequate to assure safe operation of a pipeline facility. Specifically, Collins Pipeline's CRM Plan² 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.

- **Collins Pipeline's response to Item 1:** See Attachment A, Item 1

Item 2: §195.446(e)(4) Control Room Management

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). CPF 1-2026-007-NOA Page 3 of 7 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.

- **Collins Pipeline response to Item 2:** See Attachment A, Item 2

Item 3: §195.446(e)(5) Control Room Management

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 for effective monitoring of the content and volume of general activity being directed to and required of each controller at least once 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 management

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.

➤ **Collins Pipeline’s Response to Item 3:** See Attachment A, Item 3

Item 4: §195.446(e)(6) Control Room Management

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 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.

➤ **Collins Pipeline’s Response to Item 4:** See Attachment A, Item 4

Item 5: §195.446(g)(1)(i)-(vi) Control Room Management

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).

➤ **Collins Pipeline's Response to Item 5:** See Attachment A, Item 5 & 6

Item 6: §195.446(g)(2) Control Room Management

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 of 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).

➤ **Collins Pipeline's Response to Item 6:** See Attachment A, Item 5 & 6



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As stated, CPC submits without admission, the changes to its Control Room Management Plan addressing each of PHMSA's recommendations outlined in the NOA. If these revisions meet with PHMSA's approval, CPC requests that PHMSA provide written notice that this matter is closed. Should you have any questions concerning this response, please don't hesitate to contact me at 281-602-4224 or email at Thomas.mclane@pbfenergy.com.

Respectfully,

A handwritten signature in blue ink, appearing to read "Thomas J. McLane", is written over a faint, larger version of the same signature.

Thomas J. McLane
Director, Regulatory Compliance

Attachment:

- Attachment A – Revised procedures for Items 1 through 6