Valero

January 15, 2020

Mr. James A. Urisko
Director, Southern Region
Pipelines and Hazardous Materials Safety Administration
233 Peachtree Street
Suite 2100
Atlanta, GA 30303

RE: CPF 2-2019-5006M

Dear Mr. Urisko:

On December 11, 2019, PHMSA issued a Notice of Amendment (NOA) and Valero received this document on December 17, 2019. This NOA referenced the procedural manual for operations, maintenance, and emergencies. Specifically the NOA stated that the task titled "Test Overfill Protective Devices" did not include a 30 second delay for the control center to see the alarm. Valero hereby timely submits its response to this NOA.

Valero Response
On September 18, 2019, Valero completed a revision to the Operations, Maintenance, and Emergency Procedures Manual. Revision 5.0 of this manual includes instructions in the procedure to account for the 30 second delay. Valero hereby provides a copy of this procedure.

Valero is committed to working with PHMSA to ensure compliance with all pipeline safety regulations, and Valero appreciates the professionalism of the inspectors involved in the inspection. Their comments and suggestions are valuable and appreciated. Please contact James Trevino at (210) 345-5145 or by email james.trevino@valero.com, should there be any questions

Sincerely,

J. Carlos Gauna

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Director Pipeline and Facility Integrity
Valero Partners Operating Company, LLC

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Regulatory Overview – Gas Transmission Pipelines

§192.739 Pressure limiting and regulating stations: Inspection and testing.

(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—

(1) In good mechanical condition;

(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;

(3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a); and

(4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

(b) For steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gage or more, the control or relief pressure limit is as follows:

If the MAOP produces a hoop stress that is:	Then the pressure limit is:
Greater than 72 percent of SMYS	MAOP plus 4 percent.
Unknown as a percentage of SMYS A	A pressure that will prevent unsafe operation of the pipeline considering its operating and maintenance history and MAOP.

§192.743 Pressure limiting and regulating stations: Capacity of relief devices.

(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.

(b) If review and calculations are used to determine if a device has sufficient capacity, the calculated capacity must be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates. After the

initial calculations, subsequent calculations need not be made if the annual review documents that parameters have not changed to cause the rated or experimentally determined relieving capacity to be insufficient.

(c) If a relief device is of insufficient capacity, a new or additional device must be installed to provide the capacity required by paragraph (a) of this section.

Regulatory Overview – Hazardous Liquid Pipelines

§195.428 Overpressure safety devices and overfill protection systems.

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

(b) In the case of relief valves on pressure breakout tanks containing highly volatile liquids, each operator shall test each valve at intervals not exceeding 5 years.

(c) Aboveground breakout tanks that are constructed or significantly altered according to API Std 2510 (incorporated by reference, see §195.3) after October 2, 2000, must have an overfill protection system installed according to API Std 2510, section 7.1.2. Other aboveground breakout tanks with 600 gallons (2271 liters) or more of storage capacity that are constructed or significantly altered after October 2, 2000, must have an overfill protection system installed according to API RP 2350 (incorporated by reference, see §195.3). However, an operator need not comply with any part of API RP 2350 for a particular breakout tank if the operator describes in the manual required by §195.402 why compliance with that part is not necessary for safety of the tank.

(d) After October 2, 2000, the requirements of paragraphs (a) and (b) of this section for inspection and testing of pressure control equipment apply to the inspection and testing of overfill protection systems.

Company Requirements

Inspection and Calibration Schedule

Gas Transmission and Hazardous Liquids Pipelines (non HVL)	Hazardous Liquids Pipelines (HVL)
Annually, not to exceed 15 months	Twice annually, not to exceed 7 ½ months

Test equipment used by the technician to calibrate devices shall be calibrated annually.

Overpressure Control Devices

Relief Valves No Ruptured Disc

Field personnel shall complete the following steps for relief valves with no ruptured disc:

STEP 1 Remove the valve and test with a deadweight or under controlled conditions, increase the pressure vessel or pipe deadweight pressure to the prescribed set point to check that the valve opens at the correct pressure.

STEP 2 If the valve does not relieve or reseal, have the valve adjusted or repaired immediately.

Relief Valves with Ruptured Disc

Field personnel shall complete the following steps for relief valves with ruptured discs:

STEP 1 Connect a deadweight and pressure pump between the reverse buckling rupture disc and the relief valve

STEP 2 Pump pressure to the relief pressure.

Instrument Maintenance and Calibration

Overview

Field personnel will complete instrument maintenance and calibration. The procedures contained herein provide sufficient information for general routine calibration. For additional detailed device-dependent information, field personnel should refer to the manufacturers' instruction/maintenance manual. Routine maintenance includes periodic inspection of devices for leaks, damage, failure, and tampering.

Devices to be calibrated / tested are –

- Pressure Transmitters (including Absolute, Differential, and Flow Gage)
- Temperature Transmitters
- Flow Switches
- Pressure Switches
- Actuators (including Electric, Hydraulic, and Pneumatic)
- Control Instrumentation

Basic Routine Calibration – Pressure Transmitters

STEP 1 Close process isolation valve to the transmitter.

STEP 2 Bleed and remove piping to the transmitter and connect pressure to the calibration device.

STEP 3 Apply 100% of calibration pressure as noted on the transmitter nameplate and check the transmitter output. It should read 20 milliamps. If not, adjust the span.

- Bleed down pressure the calibration device and remove the connection.
- Check the transmitter output. It should read 4 milliamps. If not, adjust to zero.

NOTE: Adjustment of zero has negligible effect on the span. Span adjustment does affect zero and will have a noticeable effect when zero is elevated or suppressed.

STEP 4 Reconnect the piping to the transmitter and open the process isolation valve.

Differential Pressure Transmitter Using the Transmitter Manifold (NOT Directly Mounted to Xmtr.):

STEP 1 Open the manifold bypass valve.

STEP 2 Close the manifold pressure valves.

STEP 3 Remove the piping to transmitter inputs.

STEP 4 Connect the pressure calibration device to the high pressure input ("H" on side of casting) and leave the low pressure side open to the atmosphere to ensure "0" psi.

STEP 5 Apply 100% of the calibration pressure as noted on the transmitter nameplate and check the transmitter output. It should read 20 milliamps. If not, adjust the span.

STEP 6 Bleed down the pressure calibration device and remove the connection.

STEP 7 Check the transmitter output. It should read 4 milliamps. If not, adjust to zero.

STEP 8 Reconnect the piping to the transmitter and open the manifold pressure valves.

STEP 9 Close the manifold bypass valve.

Differential Pressure Transmitter NOT Using the Transmitter Manifold:

STEP 1 Close the process isolation valves to the transmitter.

STEP 2 Bleed and remove the piping to the transmitter inputs.

STEP 3 Connect the pressure calibration device to the high pressure input ("H" on side of casting). Leave the low pressure side open to the atmosphere to ensure "0" psi.

STEP 4 Apply 100% of the calibration pressure as noted on the transmitter nameplate and check the transmitter output. It should read 20 milliamps. If not, adjust the span.

STEP 5 Bleed down the pressure calibration device and remove the connection.

STEP 6 Check the transmitter output. It should read 4 milliamps. If not, adjust to zero.

STEP 7 Reconnect the piping to the transmitter. Open the process isolation valves.

Flow Transmitter Using the Transmitter Manifold (NOT Directly Mounted to Xmtr.):

NOTE: The correct method of calibration is to use a manometer type of test equipment. If this equipment is not available, the Company should use an approximate type of calibration that is sufficient for its operation.

STEP 1 Calculate the current for the present flow in the pipeline (Call the Dispatcher for this information).

STEP 2 Adjust the span until the transmitter output is at the current level calculated in the previous step.

STEP 3 Open the manifold bypass valve.

STEP 4 Close the manifold pressure valve.

STEP 5 Adjust the zero until the output is at 4 milliamps.

STEP 6 Open the manifold pressure valves.

STEP 7 Close the manifold bypass valve.

Flow Transmitter NOT Using the Transmitter Manifold

STEP 1 Calculate the current for the present flow in the pipeline (Call the Dispatcher for this information).

STEP 2 Adjust the span until the transmitter output is at the current level calculated in the previous step.

STEP 3 Close the process isolation valves to the transmitter.

STEP 4 Bleed and remove the piping to the transmitter inputs.

STEP 5 Adjust to zero until the output is at 4 milliamps.

STEP 6 Reconnect the piping to the transmitter and open the process isolation valves.

Pressure Switches –

STEP 1 Isolate the switch electrically from operation.

STEP 2 Close the process isolation valve to switch (if applicable).

STEP 3 Bleed and remove the piping to switch and connect the pressure calibration device.

STEP 4 Apply the desired shutdown pressure to the pressure switch.

STEP 5 Record the as found (AF) value on the test form.

STEP 6 Make any necessary adjustments and record the as left (AL) value on the test form.

STEP 7 Reconnect the switch to operation.

Instrumentation –

STEP 1 Disconnect the shutdown switches and recorder the alarms at the sequence panel terminal board.

STEP 2 Put the instruments being calibrated in manual control.

STEP 3 In the powerhouse, connect the instrument calibration test set (or other suitable current driver) to the terminal board in place of the cable pair from the transmitter.

STEP 4 Apply the voltage or current values shown on the test form.

STEP 5 Record the AF value on the test form.

STEP 6 Make any necessary adjustments and record the AL value on the test form.

Set Point –

STEP 1 Put the controller instrument associated with the remote set point on manual control.

STEP 2 Send a signal to the supervisory unit, representing the percent of scale shown on the test form.

STEP 3 Record the AF values for each step on the test form.

STEP 4 Make any necessary adjustments on the supervisory set point converter and record the AL values on the test form.

Pressure Recorder Alarm OR the Alarm Module (Backup Shutdown) –

STEP 1 Utilizing the procedures in Set Point, drive the recorder to the desired trip point. If desired, field personnel may use the recorder instruction manual, which is the manufacturer's recommendation or user manual.

STEP 2 Record the AF value on the test form.

STEP 3 Make any necessary adjustments and record the AL value on the test form.

Overfill Protective Devices

STEP 1 Notify operations control center prior to performing any test or working on the system. Notify operations control center that alarms will be activated during testing.

STEP 2 Manually trip the overfill protective device alarm. Activate the high level alarm.

STEP 3 Verify the operations control center has received the alarms and they have cleared appropriately (be aware that there could be a 15 to 30 second delay). Confirm operability of overfill protective device.

STEP 4 Verify that the alarms were received locally and that the alarms cleared appropriately. Confirm operability of overfill protective device.

STEP 5 Verify operation of any devices, such as valves, that might operate as part of a relief flow system. Confirm operation of overfill protection control scheme.

STEP 6 If necessary, request equipment repairs or replacement. Make notifications to bring equipment into proper working condition.

STEP 7 Verify integrity of system and return system to normal operation. Complete documentation of system test.

Documentation

Upon completion of the inspection, a written report/form with the details of the inspection is forwarded to the Asset Manager or designee and the designated Central Repository.

Minimum Documentation includes:

- Date of Inspection
- Inspector's Name
- Instrument ID and Location
- Functional Condition
- As found/as left settings, if applicable
- Any follow-up maintenance work order submitted or actions taken for remedial work.
- Any communication with field operations.

RECORDKEEPING: A form to document this inspection can be found in Appendix C. Other methods of recording this inspection include SAP and Intellitrac.

Related OQ Tasks:

22 Inspect, Test and Calibrate Tank Relief Valves

23 Maintain and Repair Relief Valves and Pressure Limiting Devices (including applicable sub-tasks)

24 Inspect, Test and Calibrate Pressure Limiting Devices and Relief Valves

25 Inspect, Test and Calibrate Pressures Switches and Transmitters (including applicable sub-tasks)

26 Verify or Set Protection Params for Programmable Controllers / Other Instrumentation Control Loops

30 Test Overfill Protective Devices

31 Inspect and Calibrate Overfill Protective Devices