



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 5, 2018

Mr. Bradley Shamla
Vice President, US Operation, Liquid Pipelines
Enbridge Storage (Cushing) L.L.C.
7701 France Ave. S, Suite 600
Centennial Lakes Office Park
Edina, MN 55435

CPF 3-2018-5010M

Dear Mr. Shamla:

On August 13 – 17, 2018, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Enbridge Storage (Cushing) L.L.C. procedures for Control Room Management in Cushing, OK.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Enbridge Storage (Cushing) L.L.C. plans or procedures, as described below:

1. §195.446 Control room management.

(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402...

(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays;

Enbridge failed to develop adequate processes for the thoroughness of the point-to-point verification. Specifically, the Enbridge SCADA Point to Point Verification Procedure failed to include a time limit and quality control checkpoints for completing multiphase point to point.

Also, Enbridge failed to develop an adequate process for defining when the point-to-point verification must be completed. Specifically, the Enbridge Point to Point Verification - PLC Changes Procedure failed to include a time limit for point to point verification.

Enbridge submitted updated procedures. PHMSA has reviewed the procedures and found them satisfactory. No further action is required.

2. §195.446(a) – See Above

§195.446 Control room management.

(f) Change management. Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:

(1) Implement section 7 of API RP 1168 (incorporated by reference, see § 195.3) for control room management change and require coordination between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration; and

Enbridge failed to develop a process to mandate that a control room representative will participate in meetings where changes that could directly or indirectly affect control room operations (including routine maintenance and repairs) are being considered, designed and implemented. Specifically, Cushing Control Room Management Plan section 7.2.1 states that "control room personnel should be included in the project or change design and planning process."

Enbridge submitted updated procedures. PHMSA has reviewed the procedures and found them satisfactory. No further action is required.

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 [number of days] 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 Enbridge Storage (Cushing) L.L.C. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Allan Beshore, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2018-5010M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



Allan C. Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration

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