MAGELLAN
MIDSTREAM PARTNERS, L.P.

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December 18, 2020

Via Electronic Mail to: Gregory.Ochs@dot.gov

Mr. Gregory A. Ochs, Director
Central Region, Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: CPF 3-2020-5026

Dear Mr. Ochs,

Magellan Pipeline Company, L.P. ("Magellan") received a Notice of Probable Violation (NOPV), Proposed Civil Penalty, and Proposed Compliance Order, CPF 3-2020-5026, on November 6, 2020. In accordance with *Response Options for Pipeline Operators in Enforcement Proceedings,* Magellan requested on November 13, 2020 an extension of time to prepare an appropriate response to the Notice. Pursuant to 49 CFR 190.209, Magellan also included in this request a copy of the Case File to review the factual basis for the allegations and a copy of the Proposed Civil Penalty Worksheet. Magellan was granted an extension of time until December 18, 2020 to provide a response to the Notice. Magellan hereby submits the following response in accordance with the *Response Options for Pipeline Operators in Enforcement Proceedings.*

The NOPV alleged that Magellan committed five probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (C.F.R.) in regards to the hazardous liquid pipeline system inspections from December 11, 2018 through October 1, 2019. The NOPV also includes a Proposed Compliance Order and Proposed Civil Penalty. **Magellan does not contest the five allegations in the Notice but provides the following explanation for each violation in the response. Magellan will make payment for the Proposed Civil Penalty following receipt of the Final Order.**

Item #1: §195.116 Valves.

Each valve installed in a pipeline system must comply with the following:
(a) . . .
(f) Each valve must be marked on the body or the nameplate, with at least the following:
(1) . . .
(2) Class designation or the maximum working pressure to which the valve may be subjected.

MMP violated § 195.116(f)(2) by incorrectly marking on the valve body or the nameplate the class designation or the maximum working pressure to which the valve may be subjected. At the EDE #1-8" trap in the El Dorado East Station two valves were marked

with an ANSI 400 rating (maximum working pressure of 960 psig). However, the maximum operating pressure on the EDE #1-8" pipeline was documented as 1111 psig, and the designated the maximum working pressure of the valves is 1150 psig based on the MOP list provided by MMP and reviewed by PHMSA. MMP also provided PHMSA with internal documentation and copies of PHMSA Final Orders CPF 3521 and 3523 describing the justification for using ANSI 400 valves for the pipeline that operated at a pressure that exceeded the ANSI 400 valve rating.

However, after reviewing the documentation provided to PHMSA, Final Orders CPF 3521 and 3523 indicated that the valves should be marked with the maximum working pressure to which the valve may be subjected. Furthermore, at the time of the inspection, MMP could not provide details when requested if an additional 139 mainline valves where properly marked with the class designation or the maximum working pressure to which the valves may be subjected. This is supported by a spreadsheet provided by MMP on November 1, 2019.

MAGELLAN RESPONSE:

On January 13, 2019, Magellan provided the PHMSA Inspector with a modification to the Management of Change Procedure, SIP-ADM-11.01, that requires an MOCR for the replacement of a 400 ANSI valve. Magellan also developed and implemented a new tag, MGLN-0046 in 5.02-ADM-001 Safety Sign Matrix, which reads "WARNING This ANSI 400 valve has a MOP of 1150 psi. Valve shall not be replaced or re-worked without MOCR and input from Asset Integrity". Magellan has tagged each of the listed 400 ANSI valves that are rated for 1150 psig accordingly.

Magellan submits a copy of the above mentioned tag, MGLN-0046, and a copy of the Management of Change Procedure, SIP-ADM-11.01 in Attachment A.

Item #2: §195.404 Map and records.

(a) Each operator shall maintain current maps and records of its pipeline systems that include at least the following information:
(1) Location and identification of the following pipeline facilities:
- **(i) Breakout tanks;**
- **(ii) Pump stations;**
- **(iii) Scraper and sphere facilities;**
- **(iv) Pipeline valves;**
- **(v) Facilities to which §195.402(c)(9) applies;**
- **(vi) Rights-of-way; and**
- **(vii) Safety devices to which §195.428 applies.**

(2) All crossings of public roads, railroads, rivers, buried utilities, and foreign pipelines.
(3) The maximum operating pressure of each pipeline.
(4) The diameter, grade, type, and nominal wall thickness of all pipe.

MMP violated §195.404(a) by failing to maintain current maps and records of the location and identification of its pipeline systems for multiple pipeline facilities.

On March 19, 2019, PHMSA inspectors discovered that the Argentine Meter Station piping and instrumentation diagram (P&ID) failed to accurately depict the custody transfer location. The P&ID also failed to identify where MMP owned facilities ended and Sinclair owned facilities began.

On April 5, 2019, PHMSA inspectors discovered that the Lincoln Terminal P&ID failed to correctly identify thermal relief safety devices to which §195.428 applies with the correct maximum set points.

On June 3-7, 2019, PHMSA inspectors discovered that the 2016 pipeline replacement project had not been documented in MMP's official record keeping system PODs. The Fargo-Grand Forks #1-6" pipeline had been replaced in 2016 yet the database depicted an ANSI 400 valve installed on January 1, 1987. The ANSI 400 valve was replaced during the 2016 replacement project with a higher rated ANSI 600 valve.

MMP also violated 49 C.F.R. §195.404(a) by failing to maintain current maps and records of the diameter, grade, type, and nominal wall thickness of all pipe.

On June 3-7, 2019, PHMSA inspectors discovered that the 2016 pipeline replacement project had not been documented in MMP's official record keeping system PODs. The Fargo-Grand Forks #1-6" pipeline had been replaced in 2016 yet the database depicted a repair sleeve installed on September 16, 2014. The repair sleeve was no longer in existence and was replaced with a new pipeline during the 2016 project.

MAGELLAN RESPONSE:

Magellan does not contest the Proposed Warning Item. Magellan has completed the applicable revisions to the P&ID for Argentine to reflect the correct ownership break and for Lincoln to correctly identify the thermal relief devices and their current Max Limit values. The #1-6 Fargo to Grand Forks pipe replacement attributes have also been updated in Magellan's PODS database.

Item #3: §195.452 Pipeline integrity management in high consequence areas.

(a) . . .
(b) *What program and practices must operators use to manage pipeline integrity?* Each operator of a pipeline covered by this section must:
(1) . . .
(5) Implement and follow the program.

MMP violated §195.452(b)(5) by failing to implement and follow its Integrity Management Program (IMP). Specifically, Section 6.4 Risk Analysis Overview of MMP's IMP states that each analysis for facility piping systems will be documented per the System Equipment Review Form. MMP identified 71 facilities that were in a high consequence area (HCA) or could affect an HCA. Of those 71 facilities, 54 do not have a completed System Equipment Review Forms. MMP's IMP also allows for the incorporation and analysis of data collected through several distinct programs. Examples of these programs include ultrasonic thickness inspections per API 510/570, vibration analysis of rotating equipment, and API 653 tank inspections. However, these individual programs

were not collectively documented and evaluated on the System Equipment Review Forms to determine if additional preventive or mitigative measures were necessary for the facilities. Therefore, MMP failed to follow its IMP in performing analysis for 54 of its 71 facilities.

MAGELLAN RESPONSE:

Magellan does not contest that all facilities in an HCA or that could affect an HCA did not have a System Equipment Review (SER) completed. At the time of the PHMSA inspections, Magellan was actively revising the Facility Integrity Management Plan and shared these plans with the PHMSA inspectors. Magellan submitted 70 facilities during the 2019 inspection that were in or that could affect an HCA. Of those, 39 System Equipment Review Forms were determined to be completed prior to the inspection, bringing the total number of facilities without a completed System Equipment Review Form to 31.

A meeting was held with PHMSA in December 2019 to review the revised and enhanced Facility Integrity Management Plan (FIMP). The FIMP includes an assessment on a Facility Risk Assessment Worksheet, 07-FORM-7602, which will determine a risk score and a re-inspection interval that will be maintained in the Facility Risk database. The assessment will also produce recommendations in the form of preventative and mitigative measures that will be tracked in the database and completed on a priority basis based upon the risk evaluation. Across Magellan's assets, 63 Facility Risk Assessments have been completed.

Item #4: §195.452 Pipeline integrity management in high consequence areas.

(a) . . .
(j) *What is a continual process of evaluation and assessment to maintain a pipeline's integrity?*
(1) *General.* After completing the baseline integrity assessment, an operator must continue to assess the line pipe at specified intervals and periodically evaluate the integrity of each pipeline segment that could affect a high consequence area.
(2) *Evaluation.* An operator must conduct a periodic evaluation as frequently as needed to assure pipeline integrity. An operator must base the frequency of evaluation on risk factors specific to its pipeline, including the factors specified in paragraph (e) of this section. The evaluation must consider the results of the baseline and periodic integrity assessments, information analysis (paragraph (g) of this section), and decisions about remediation, and preventive and mitigative actions (paragraphs (h) and (i) of this section).

MMP violated §195.452(j)(2) by failing to complete periodic evaluations to assure pipeline integrity on all of its pipelines, including facilities. MMP identified 71 facilities that were in a HCA or could affect an HCA. Of those 71 facilities, two facilities, the Columbia Pipeline Junction and the Wathena Pipeline Junction, had not been evaluated for all the risk factors specific to the facilities. At the time of the inspection, MMP provided documentation, which showed that none of the following reviews, analyses, or assessments had been completed for these two facilities: System Equipment Review Form, System Equipment Review Analysis, Facility RISK Model Questionnaire, or a Facility Risk Ranking Assessment Tool. Consequently, MMP was unable to

demonstrate that all necessary inspections, assessments, and evaluations had been completed to assure pipeline integrity as required by §195.452(j)(2).

MAGELLAN RESPONSE:

Magellan does not contest that Columbia Pipeline Junction and Wathena Pipeline Junction had not been evaluated for all risk factors specific to the facilities.

Item #5: §195.505 Qualification Program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:
(a) . . .
(h) After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities; and . . .

MMP violated §195.505(h) by failing to have and follow its procedure for ensuring through evaluation that individuals performing covered tasks have the necessary knowledge and skills to perform certain covered tasks required by its Operator Qualification (OQ) Program in a manner that ensures the safe operation of its pipeline facilities. Specifically, MMP was unable to demonstrate that the individuals who performed breakout tank inspections had the necessary adequate knowledge of MMP's covered task 27.1 Routine Monthly Inspection of Breakout Tanks as evidenced by the monthly tank inspection records.

MMP's covered task list describes Task 27.1 Routine Monthly Inspection of Breakout Tanks as, "Breakout tanks must be inspected monthly per API 653. The inspection includes the foundation, the shell, flanges, valves, and the roof." Furthermore, the covered task list also references API RP 1161 Task 27.1-Perform Routine Inspection of Breakout Tanks (API 653 Monthly or DOT Annual). Section 3 step 5 of API RP 1161 Task 27.1-1 specifically states, "Visually inspect the tank roof for the following: coating conditions, holes, pitting, and corrosion; standing or pooling water or product; floating roof out of level." However, neither MMP's procedure 7.10-ADM-009 nor form 07-FORM-0077 provides guidance or a location to record the condition of the roof. Additionally, MMP's inspection records did not identify shell distortions, leaks, unmitigated corrosions pits, and other prevailing tank integrity threats as required by the breakout tank inspection procedures. During PHMSA's inspection, MMP's Tank Integrity Manager made a comment that the company's OQ training for breakout tanks had room for improvement. Therefore, MMP failed to have and follow a procedure for ensuring through evaluation that individuals performing covered tasks have the necessary knowledge and skills to perform certain covered tasks, specifically breakout tank inspections, required by its OQ Program in a manner that ensures the safe operation of its pipeline facilities.

MAGELLAN RESPONSE:

Magellan would like to clarify that API Recommended Practice - RP 1161 is not incorporated into Task 27.1 – Routine Monthly Inspection of Breakout Tanks or Magellan's procedure 7.10-ADM-009 Monthly External Tank Inspection. As detailed in the instructions of 2.02-ADM-001 Covered Task list, when referring to the API/OQCs cross references, "These categories were developed by API/OQCs and may or may not correlate directly to Company job classifications." Further the instructions for the API OQC Number column in the task list states, "This column cross-references the Company covered task numbers to the API OQC covered task list numbers. The API OQC numbers are the ones used by Contractors." Magellan's Monthly Inspection of Breakout Tank procedure states in 2.2.1 "The inspection shall be performed by walking around the tank at ground level."

Regarding the necessity to inspect the tank roof, Magellan asserts procedure 7.10-ADM-009 Monthly External Tank Inspection did not require inspection in accordance with API RP 1161. Magellan requests that commentary associated with API RP 1161 and associated roof inspection criteria be rescinded from the Notice of Probable Violation as API RP 1161 is not Incorporated by Reference into 49 CFR Part 195 in part or whole.

Magellan does not contest the Proposed Compliance Order for Item 5 and is in the process of enhancing the Qualification Training.

If you have any questions or need additional information, please contact me by phone at (918) 574-7073 or e-mail at mark.materna@magellanlp.com to discuss.

Sincerely,

Mark Materna
Director, Pipeline Integrity

Cc: Jason Smith, Vice President, Asset Integrity, Magellan

Attachment A


WARNING
THIS ANSI 400 VALVE HAS A MOP OF 1150 PSI. VALVE SHALL NOT BE REPLACED OR RE-WORKED WITHOUT MOCR AND INPUT FROM ASSET INTEGRITY
Reorder: MGLN-0046 www.ComplianceSigns.com

1.0 OBJECTIVE

1.1 This initiative is designed to ensure that change impacts are reviewed by appropriate stakeholders to ensure that all company and regulatory requirements have been addressed and any associated risks have been mitigated prior to implementing the proposed change. This initiative establishes the process for determining when and how to implement a Management of Change Request (MOCR).

1.2 This initiative also describes the process for initiating and completing a Process Hazard Analysis (PHA) when required.

2.0 DESCRIPTION

2.1 This initiative applies to all changes (except for those noted in 2.1.2) to process chemicals, technology, equipment, instrumentation, material, regulatory jurisdiction, process set points, process controls and applicable procedures.

2.1.1 Some typical change examples requiring a MOCR include, but are not limited to:

2.1.1.1 New raw materials or additives.

2.1.1.2 New equipment or instrumentation (add on).

2.1.1.3 Changes in area electrical classification.

2.1.1.4 Changes to computer software that require changes to documented procedures.

2.1.1.5 Changes to fixed alarms, Emergency Safety Devices (ESDs), instrumentation, control schemes, interlocks, or relief set points.

2.1.1.6 Bypass of equipment, fixed alarms (not covered by a procedure), ESDs, instrumentation, control schemes, interlocks, or relief systems.

2.1.1.7 Equipment modifications including changes to structural support, layout or configuration—equipment replacements must be identical in terms of the engineered design specification to be considered a replacement in kind.

2.1.1.8 Different materials of construction, e.g., replaced carbon steel valve seats with stainless steel valve seats.

2.1.1.9 Temporary connections or equipment, including rentals and experimental equipment.

2.1.1.10 Decommissioning, abandoning, or inactivating equipment, including piping and/or tanks.

2.1.1.11 Experimentation.

2.1.1.12 Refined tank product grade changes for tanks that deliver to a loading rack.

2.1.1.13 Changes that could affect the regulatory jurisdiction of the asset. Example: Pipeline Hazardous Materials Safety Administration (PHMSA).

2.1.1.14 Changes to site specific procedures associated with regulated assets; i.e., Pipeline and Hazardous Materials Safety Administration (PHMSA), Coast Guard, Process Safety Management (PSM)/Risk Management Program (RMP) or assets covered by the Mitigation Plan. Consult with an Asset Integrity Engineer or PSM Engineer for any questions regarding applicability.

2.1.1.14.1 Site Specific PSM procedures do not need a MOCR for editorial changes such as grammar, punctuation, hyperlinks, etc.

2.1.1.15 Removal or replacement of any ANSI 400 valve or replacement of any ANSI 400 flange. MOCR is required to ensure compliance with 1981 Office of Pipeline Safety waiver for operating pressures on these valves and flanges.

2.1.2 A MOCR is not required for:

2.1.2.1 Replacements in kind (other than pipe). A replacement in kind is a change that satisfies the engineering design specifications of the original component and process such that it does not affect procedures or parameters including: flow, pressure, temperature, level, composition, phase, or utilities.

2.1.2.2 Replacement of pipe with the same outside diameter, weight, grade, and seam type or for pipe with equivalent or greater maximum operating pressure per 49 CFR 195.406.

2.1.2.3 Changes that impact only Operations Control and are managed via SCADA Systems Integrity Plan.

2.1.2.4 Creation of new or changes to site-specific procedures for routine operations of non-regulated assets that are managed via Site Specific Procedure Management.

> **NOTE**: As stated above, new or revised site-specific procedures for regulated assets do require a MOC.

2.1.2.5 Changes to set points within a published limit or level and reviewed by an Asset Integrity Engineer (e.g., adjusting suction pressure setting on a pump unit would not require a MOCR as long as it stays above the published low suction control point).

2.1.2.6 Pressure adjustments required by the Integrity Management Program or in response to the potential to exceed MOP. Asset Integrity will provide a table detailing the current and revised pressure settings and distribute the adjustments to the applicable stakeholders. Change implementation will be communicated to applicable stakeholders upon completion.

2.1.2.7 Changes that pertain to the System Integrity Plan (SIP) initiatives, standards, procedures, or any other global changes that are managed via SIP Continual Improvement.

> **NOTE**: The MOCR process cannot be used in lieu of the SIP Continual Improvement process.

2.1.2.8 Crude tank product grade changes that are managed by SIP 15.07-ADM-002.

3.0 STANDARDS

3.1 All Employees (originating a MOCR) shall:

3.1.1 Initiate a MOCR when required per this standard via the KMI electronic workflow process. Reference the KMI toolbox for instruction and guidance in completing the workflow.

> **NOTE:** For complex or multi-phase projects, consider using more than one MOCR to manage the changes. For changes that affect multiple facilities complete a separate MOCR for each impacted facility.

3.1.2 Upload any supporting documentation to the KMI electronic workflow prior to initiating the Asset Supervisor Verification review. The electronic KMI workflow process will automatically assign a MOCR tracking number.

3.1.2.1 For changes to PSM/RMP assets, supporting documentation includes Process Safety Information (PSI) including but not limited to SDS sheets, Process Flow Diagrams, P&IDs, Material certification, equipment/device operation and maintenance manuals, cut sheets, relief valve designs, pump curves, etc.. If a change impacts Process Safety Information, the new PSI should be uploaded to the KMI system.

3.1.3 Implement any revisions per the above review prior to Stakeholder review. Mandatory stakeholders include the Environmental Specialist, Air Specialist, Safety Specialist, and Asset Integrity Engineer. Other stakeholders should be selected based on the change type, and location of the requested change.

3.1.4 Contact an Asset Integrity Engineer or Process Safety Engineer to determine the need for a Process Hazard Analysis (PHA) and the appropriate methodology to use (What-If/Checklist, Integrity Review Checklist, HAZOP, etc.).

3.1.5 If any stakeholder rejects the MOCR, work with the stakeholder(s) to resolve the concern, modify the change scope as appropriate, and reinitiate the review process of the revised MOCR to all stakeholders for approval.

3.1.6 Once all stakeholder approvals have been received provide Final MOCR approval (Ready for Implementation) in coordination with the Asset Supervisor.

3.1.7 The electronic KMI workflow process will capture and retain documents and MOCR status.

3.1.8 If the requested change is associated with a project, ensure the Project File includes a copy of the completed MOCR or the MOCR tracking number so the MOCR can be easily located in the KMI electronic workflow.

3.2 **All Asset Supervisors shall**:

3.2.1 Review the MOCR to verify (Verification review): it is complete, appropriate stakeholders have been selected, and that it includes sufficient detail to enable a thorough stakeholder review and approval. Advise the Originator of any needed revisions.

3.2.2 Once all stakeholder approvals have been received provide Final MOCR approval (Ready for Implementation) in coordination with the Originator.

3.2.3 Once the modification(s) has been implemented, verify a Pre-Startup Safety Review (PSSR) has been completed if required, and approve the MOCR Closure section. Upload the completed PSSR(s) as applicable in the electronic KMI workflow prior to providing MOCR closure approval.

3.2.4 For changes associated with PSM/RMP assets, ensure affected personnel are informed of and trained in the change prior to the start-up of the process. Document the training on 02-FORM-0208 – PSM/RMP Training Form and upload the completed form in the electronic KMI workflow. Upload the training document with the PSSR if a PSSR is required for the change.

NOTE: For PSM/RMP changes at Corpus Christi, training documentation can be included in the corresponding MOCR packet on-site, in the electronic KMI workflow, or both.

3.2.5 Retain completed PHAs at the facility in a location where employees have access.

Access may be electronically in livelink.

3.3 **All Employees (reviewing a MOCR) shall**:

3.3.1 Review the MOCR for their area of expertise. Approve or reject the proposed change(s) as described in the MOCR. If necessary, refer to the appropriate stakeholder checklist to facilitate review. If the stakeholder checklist is completed, it should be uploaded to the KMI electronic workflow as part of the approval process. Utilize the electronic KMI workflow Comments section in the Audit Trail for any questions or concerns with the MOCR. Stakeholder checklists are as follows. **NOTE:** The MOCR Safety Specialist Review Checklist shall be completed for all PSM/RMP MOCs.

3.3.1.1 MOCR Facility Integrity Review Checklist

3.3.1.2 MOCR Environmental Specialist Review Checklist

3.3.1.3 MOCR Air Specialist Review Checklist

3.3.1.4 MOCR Safety Specialist Review Checklist

3.3.1.5 MOCR Prime Equipment Review Checklist

3.3.2 Utilize, where appropriate, the action item functionality in the VelocityEHS workflow process to ensure tasks are completed prior to closure of the MOC. An example includes the submittal of redlines associated with a change to P&IDs, mechanical, and/or electrical drawings to the design services group to be modified and uploaded to the Asset Drawing Viewer.

3.3.2.1 For MOCs that include a new or modified PSM Site Specific Procedure, an action item shall be generated and assigned to the appropriate PSM Engineer to upload the approved procedure into the site's PSM procedure Livelink folder.

3.4 **The Supervisor, Asset Integrity Engineering shall**:

3.4.1 Maintain a Process Safety Management (PSM)/Risk Management Program (RMP) for applicable facilities.

3.4.2 Ensure the initial PHA is updated and reevaluated every five years for PSM/RMP covered processes or according to the Mitigation Plan.

3.4.3 Submit the initial RMP prior to startup of new PSM/RMP facilities and ensure the initial RMP is updated and resubmitted every five years to the Environmental Protection Agency.

3.4.3.1 Review all RMP facilities each month to determine if there have been any changes to the emergency contact information in the RMP. If so, update the RMP and present it to the Vice President, Technical Services, for certification.

3.4.3.2 Review all RMP facilities every six months to determine if there are any required updates or corrections (as described below) to the RMP. If so, update the applicable RMP(s) and provide to the Vice President, Technical Services, for certification.

3.4.3.2.1 New accident history information

3.4.3.2.2 A change that requires a revised PHA or hazard review

3.4.3.2.3 A change that requires a revised offsite consequence analysis

3.4.3.2.4 A change that alters the RMP Program level

3.4.3.2.5 A change that results in the source no longer being subject

to the RMP regulation

3.5 **Asset (Facility) Integrity Engineer shall**:

3.5.1 For facilities covered by the Mitigation Plan, the AI Engineer shall evaluate the change using an appropriate hazard analysis consisting of the Facility Integrity Review checklist or other PHA process that complies with the PHA Procedure.

3.5.2 Upon notification of any proposed change to the Mitigation Plan, review the proposed change with PHMSA and obtain written concurrence with PHMSA for the proposed modification(s). At the time the change is submitted to PHMSA post the modified Mitigation Plan with justification on the Magellan corporate Internet website and provide the modified Mitigation Plan with justification to the General Manager of the Lower Colorado River Authority and the Mayors of Houston, Austin and El Paso (LMP First Supplement to the Longhorn Mitigation Plan for LMC 39).

3.5.3 For PSM/RMP facilities, determine the need for a PHA based on changes to the existing PHA, process safety information as required by the Critical Drawings and Map List, or changes to operating and maintenance procedures. An initial PHA is required for new PSM/RMP facilities. If a PHA is required, comply with the PHA Procedure.

3.5.4 For non PSM/RMP or facilities not covered by the Mitigation Plan, determine the need for a PHA for complicated or high impact changes, or for changes that require heating within the process. If a PHA is required, comply with the PHA Procedure.

3.6 **Field Office Administrator shall**:

3.6.1 Prepare a monthly area report to document the status of open MOCRs at each facility within their area of responsibility and forward to the appropriate Supervisor and Manager.