



August 17, 2023

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

Re: **CPF 3-2023-013-NOA**
Response of CPF 3-2023-013-NOA
Boardwalk Petrochemical Pipeline, LLC ("Boardwalk") to Notice of Amendment
("NOA" or "Notice")

Dear Mr. Ochs,

On July 20, 2023, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued the above-referenced Notice in association with the inspection of Boardwalk's Control Room Management Program procedures and records in Sulphur, LA, conducted remotely from September 19 through September 23, 2022.

As stated in the Notice, Items # 1, 2, 5, and 7 were addressed following the inspection and acknowledged by PHMSA as no further action being required. However, there were additional amended procedures that were provided following the inspection that were not mentioned in the Notice.

Boardwalk is providing the following responses with respect to the alleged inadequacies cited by PHMSA for the remaining items that were listed as still open. All referenced supporting documentation for each item is attached to this letter, including Management of Change (MOC) documentation.

Open NOA Items

Item 3. Leak Detection Alarming (§195.446 (c)(2))

Boardwalk implemented safety-related alarms for rate of change and pipeline balance in November 2022. Communication was sent to the Controllers during the SCADA MOC process and from the Control Room Manager. Procedures were updated in Section 6.2 of the *Control Room Management Plan: Hazardous Liquids* ("CRM-HL").

These amended procedures were submitted to PHMSA in November 2022, along with a revised list of safety-related alarms from our SCADA database. These procedures were revised in MOC 2022-11-01 and revised procedures were submitted in November 2022 and May 1, 2023. The updated list of alarms and SCADA MOC documentation was submitted in November 2022.

Additionally, Boardwalk reviewed the “additional alarms” in question and determined all of them fall under the category of “Hazardous Atmosphere,” which is represented in the procedures as safety related.

Item 3 Documentation: Communications, CRM-HL (Section 6.2), MOC 2022-11-01

Item 4. Manual Operation of the Pipeline (§195.446 (c)(3))

Boardwalk created form BWP-HL-1048: *Control Center Manual Operations Record* to consistently document information collected during manual operations. References to this form and improvements to procedures are recorded in Section 4.9 of the CRM-HL, Task List 6650-HL: *Manual Operations/Pipeline Shutdown Task List* (located in Appendix 5 of the CRM-HL), and the *BLM Pipeline Control Business Continuity Plan* (page 10). Additionally, a process for identifying and responding to abnormal operations or emergencies was formally documented on Task List 6650-HL and in the *BLM Pipeline Control Business Continuity Plan* (page 11). Boardwalk published procedure updates and form in MOC 2023-04-04. Revised procedures and MOC were submitted on May 1, 2023, to PHMSA.

Item 4 Documentation: BWP-HL-1048: *Control Center Manual Operations Record*, CRM-HL (Section 4.9), *BLM Pipeline Control Business Continuity Plan* (page 10, 11), MOC 2023-04-04

Item 6. Hours of Service Tracking (§195.446 (d))

Boardwalk immediately began tracking the hours-of-service for the Manager of the Control Room post-inspection. Records of this practice were submitted to PHMSA on January 10, 2023. Boardwalk revised procedures in Section 5.3 of the CRM-HL and submitted those to PHMSA May 1, 2023. Redlines were submitted January 10, 2023, to PHMSA and documented in MOC 2023-04-04. Revised procedures and MOC were submitted on May 1, 2023.

Item 6 Documentation: CRM-HL (Section 5.3), 2023-04-04

Item 8. Monitoring/Evaluation of General Controller Activity (§195.446 (e)(5))

Boardwalk is in the process of revising its procedures to include a metric for determining if Controller workload is excessive or sufficient. A redlined document is attached for review.

Item 8 Documentation: 6611: *Annual Controller Activity Review Task List* redline

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Item 9. Alarm Management Deficiencies (§195.446 (e)(6))

Effective May 2023, Boardwalk amended its procedures to capture this information using the False Alarm Reports. Amended procedures are in section 6.9 of the CRM-HL, which is attached to this letter. (MOC 2023-04-25 - published May 19, 2023).

Item 9 Documentation: CRM-HL (Section 6.9), MOC 2023-04-25

Item 10. Change Management (§195.446 (f)(1))

Boardwalk amended its procedures to include a definition of “OMS,” “GCSR,” and “SCADA MOC” in the CRM-HL. A review of the entire Plan was also conducted, and language was updated throughout to better explain the use of these applications as it pertains to change management. This is documented in MOC 2023-04-04 with additional revisions after meeting with PHMSA. Revised procedures and MOC were submitted on May 1, 2023.

Item 10 Documentation: CRM-HL, MOC 2023-04-04

Through the actions specified in this letter, Boardwalk has fulfilled the requirements of this Notice. If you have any questions concerning the information contained in this response, please do not hesitate to contact me or Tina H. Baker, Manager, Compliance Services.

Respectfully Submitted,



Tony G. Rizk
Vice President, Technical Services

CC: Tina H. Baker

Enclosures: Items 3, 4, 6, 8, 9, 10 Supporting Documentation