U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

901 Locust Street, Suite 480
Kansas City, MO 64106

WARNING LETTER

VIA ELECTRONIC MAIL TO: rjstamour@marathonpetroleum.com; mlbailey@marathonpetroleum.com

November 20, 2023

Richard St. Amour
President
Marathon Pipe Line LLC
539 South Main St
Findlay, OH 45840

CPF 3-2023-032-WL

Dear Mr. St. Amour:

From April 3 through September 1, 2023, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Marathon Pipe Line LLC's (Marathon) OWC inspection system. The headquarters inspection was completed in Findlay, Ohio and the field inspection ran from Owensboro, Kentucky to Catlettsburg, Kentucky.

As a result of the inspection, it is alleged that Marathon has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. **§ 195.579 What must I do to mitigate internal corrosion?**
   (a) . . . .
   (c) Removing pipe. Whenever you remove pipe from a pipeline, you must inspect the internal surface of the pipe for evidence of corrosion. If you find internal corrosion requiring corrective action under § 195.585, you must investigate circumferentially and longitudinally beyond the removed pipe (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the removed pipe.

Marathon failed to inspect the internal surface of pipe for evidence of corrosion. During the headquarters inspection conducted in Findley, Ohio from April 3-7, 2023, while reviewing corrosion records it was noted that an internal corrosion inspection was not completed during a project that removed pipe from the pipeline. An internal inspection is required anytime pipe is removed from the pipeline.
Project 158525 replaced tank lines for tank 801 and 802 at Lebanon Junction Station. The Land and Pipe Inspection Checklist report was filled out on August 10, 2021. This report records corrosion issues such as coating damage and external corrosion when a pipeline is exposed and internal corrosion whenever a pipe is removed from the pipeline. Although a portion of the pipeline was removed, during this project an internal inspection was not completed.

Per a response from Marathon on October 17, 2023, the project leader and inspector did not believe that an internal inspection was required because the pipeline had previously been drained and abandoned in place. The project team did not consider removal of existing above-grade piping at the tie-in with new piping at a flanged valve. Marathon took actions to ensure an internal inspection would be completed on similar projects by updating the form and completing training with all company project leaders.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed $257,664 per violation per day the violation persists, up to a maximum of $2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed $239,142 per violation per day the violation persists, up to a maximum of $2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed $225,134 per violation per day the violation persists, up to a maximum of $2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed $222,504 per violation per day the violation persists, up to a maximum of $2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed $218,647 per violation per day the violation persists, up to a maximum of $2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed $213,268 per violation per day, with a maximum penalty not to exceed $2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed $209,002 per violation per day, with a maximum penalty not to exceed $2,090,022.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Marathon Pipe Line LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2023-032-WL.** 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).

Sincerely,

Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Mandy Bailey, DOT Compliance Assistant, Marathon Pipeline, LLC
(mlbailey@marathonpetroleum.com)