

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: gregory.mcilwain@energytransfer.com;
todd.nardozzi@energytransfer.com; eric.amundsen@energytransfer.com;

June 5, 2024

Gregory McIlwain
President/CEO
Energy Transfer Company
8111 Westchester
Dallas, TX 75225

CPF 3-2024-021-NOA

Dear Mr. McIlwain:

From March 29 to January 11, 2023, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Crestwood Midstream Partners, LP/Colt Connector Pipeline's (Colt Hub) control room for Control Room Management (CRM) procedures in Crestwood, North Dakota, by video conference inspection. Colt Hub is a subsidiary of Crestwood Midstream Partners, LP. On November 3, 2023, Crestwood Midstream Partners, LP was acquired by Energy Transfer Company.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within Colt Hub's plans or procedures. The items inspected and the inadequacies are 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.

Colt Hub's CRM Program Manual, updated August 2020, Rev 20200820 (CRMP), section 107, entitled "Annual Review of CRM and Alarm Management Plan Procedures," stated "[t]his control room and alarm management plan will be reviewed by the Operations Supervisor once per calendar year not to exceed 15 months. The annual review will be documented and retained." Colt Hub's procedure did not contain a written process to ensure that control room management procedures and associated procedures are reviewed, and that the necessary changes are made to ensure that the procedures are effective as required by §§ 195.402(a), 195.402(c)(13), 195.402(c)(15), and 195.402(d)(5). The CRMP referenced Form 107 in Appendix F, however, Appendix F was related to the Applicability Survey and Appendix A was related to Forms. In addition, CRMP section 107, did not contain a written process for version managements (for example, track and control changes) for the CRM procedures and associated procedures. Furthermore, CRMP section 107, lacked details on the draft, approval, and publication process. Also, there was no information on promulgating new procedures (or updating an existing one).

The procedure needs to be amended to correct the format of the procedures to ensure consistency and accuracy, including date and version designation. Additionally, the procedures need to be amended to include: a written process to ensure CRM procedures and associated operating procedures are reviewed and that the necessary changes are made to ensure they are effective; and a written process on version management (for example, track and control changes) for the CRM procedures and their associated procedures.

2. § 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. . . .

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1)

(2) A controller's role when an abnormal operating condition is detected, even if the controller is not the first to detect the condition, including the controller's responsibility to take specific actions and to communicate with others.

Colt Hub's CRMP was not adequate to demonstrate compliance with defining the controller's role when an abnormal operating condition is detected. Section 203 of the CRMP, entitled "R&Rs – Primary Controller Responsibilities and Level of Authority," referenced the O&M Manual, but not the specific section within the O&M that is applicable for abnormal operations. In addition, O&M section 3.11, entitled "Return to Normal Operations," did not mention what the controller must monitor until return to normal.

The procedure needs to be amended to reference the specific section within the O&M that is applicable for abnormal operations. Additionally, O&M section 3.11 needs to be amended to include a description of what the controller must monitor until return to normal.

3. § 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. . . .

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating condition, an operator must define each of the following:

(1)

(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others.

Colt Hub's CRMP was not adequate. Specifically, Section 203, R&Rs – Primary Controller Responsibilities and Level of Authority, referenced the O&M Manual, but not the specific section within the O&M which was applicable to emergency response. During the inspection, Colt Hub produced Leak Detection Standard Operating Procedure (SOP)#16, Revision no: 4 Approved and Effective 10/4/2018 (Leak Detection), which stated the Maximum Allowable Operating Pressure (MAOP) was 1440 psi. This was incorrect; Colt Hub's stated MAOP is 1480 psi. Also, Crestwood used a spreadsheet, entitled "Pipeline Leak Detection Pump Log Master," with calculated flow rates but did not describe when it found a variance the actions to be taken including documentation. This document was not referenced in the CRMP.

The procedure needs to be amended to include a reference to the specific section of the O&M Manual applicable to emergency response. SOP #16 also needs to be amended to correct any inaccuracies in stated MAOP and provide instruction for the action a controller must take when a variance is identified in the Pipeline Leak Detection Pump Log Master, including documentation, and provide a reference to this document in the CRMP.

4. § 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. . . .

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating

conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1)

(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others.

Colt Hub's CRMP was not adequate to define the controllers' roles and responsibility to take specific action during an emergency when the control room must be evacuated. Specifically, section 203, entitled "R&Rs – Primary Controller Responsibilities and Level of Authority Controller Responsibility During Evacuation," did not contain a detailed written process for the controller's roles and responsibilities when the control room must be evacuated. The process did not describe who the controller must contact, such as supervisor(s), field personnel, and so forth. Furthermore, Section 203 did not reference applicable shut down and manual operation procedures required during the period of evacuation, nor did it address whether a controller needs approval to shut down and/or start up the pipeline. The procedure did not describe the items (laptop, logbooks, control room management procedures, emergency procedures, cell/radio, etc.) that controllers must bring with them when they leave the control room to maintain some level of operation. This information is important to include because the operator does not have a physical back-up control room. Overall, the CRMP, section 203, did not give sufficient instructions for controller's role and responsibilities in the event of evacuation of the control room.

The procedure must be amended to provide a detailed written process with sufficient instructions of the controller's roles and responsibilities and the controller's specific actions when faced with the decision or need to evacuate the control room.

5. § 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. . . .

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1)

(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others.

Colt Hub's CRMP was not adequate to define the controller's roles and responsibility during the emergency condition of loss of communications. During the inspection, Crestwood produced its procedure entitled "Crestwood Crude Logistics Abnormal Operating Conditions -Coms Loss" (Crestwood Coms Loss Procedure). Crestwood Coms Loss Procedure section 3, "Actions To Be

Taken,” did not describe who would be involved in loss of communication, such as SCADA personnel or IT personnel. In addition, section 3 stated, “[w]hen the source for the Coms Failure has been resolved, the Terminal Operator will make the necessary alarm acknowledgement and ESD system re-sets and proceed with resuming operations.” However, this statement was inconsistent with O&M section 3.11, “Abnormal Operations,” which stated that “[a]fter the cause of the abnormal condition has been identified and corrected, [the controller must] notify the Pipeline Supervisor or designee, who must authorize the resumption of full operation.” Crestwood’s Coms Loss Procedure was not referenced in its Colt Hub CRMP.

The Colt Hub CRMP must be amended to reference the Crestwood Coms Loss Procedure. Additionally, the procedure must be amended to describe the steps a controller must take during a loss of communications response, and who would be involved in such a response. This must include how long a controller should wait during loss of communications before acting, recognizing there is a period when they may return without intervention. The procedure must also correctly reflect who is authorized for restart operations after a shutdown.

6. § 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. . . .

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1)

(4) A method of recording controller shift-changes and any hand-over of responsibility between controllers; and

Colt Hub’s CRMP was not adequate to define a method of recording controller shift-changes and any hand-over of responsibility between controllers. Specifically, during the inspection, Colt Hub mentioned that, in practice, the controllers must sign a logbook and then log in to SCADA to transfer roles and responsibilities to the incoming controller. However, Colt Hub’ CRMP section 204, entitled “R&Rs – Shift Change Information & Accountability, Defining Minimum Shift Change Information Requirements,” did not contain information about logging into SCADA.

Colt Hubs CRMP section 204, entitled, “R&Rs – Shift Change Information & Accountability,” referenced Appendix A, CRM Form 204 EQ Shift Change Information (Form 204), to record information. During the inspection, a PHMSA inspector noticed multiple Forms 204, dated May 4, 2018, evening; December 20, 2018, morning; February 17, 2019, morning; July 15, 2019, evening; January 1, 2020, evening; and July 11, 2020, evening, lacked details and had inconsistent entries between each form. Crestwood provided for inspection a logbook that

included more details about activities that occurred during a shift, but this logbook was not referenced in the CRMP as a requirement to review at shift change.

The procedures need to be amended to provide instructions on the method of recording controller shift-changes and any hand-over of responsibility between controllers related to how controllers are to log on/log off SCADA during shift changes, and the steps to complete the designated shift change documentation form to provide consistency in the process. As part of the procedure, the form(s) used for shift change need to be referenced and a template provided, as well as retention time and location.

7. § 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. . . .

(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1)

(5) The roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers.

Colt Hub's CRMP was not adequate to define the roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers. Specifically, during the inspection, Crestwood indicated that it did not allow other employees to have authority to direct or supersede the specific technical action of a controller. However, Colt Hub's CRMP, section 203, entitled "R&Rs – Primary Controller Responsibilities and Level of Authority, Control Center/Room Coordinator and/or Supervisor Directing or Advising a Controller on Actions to Take to Complete a Safety Related Tasks," stated, "[a]n Operations Supervisor may direct or advise a controller on specific actions to complete a safety related task if the Operations Supervisor is also a qualified controller." Section 203 did not include any statement or position related to who can supersede the specific technical actions of a controller, nor under what conditions direct or supersede could occur or how the action would be implemented and documented.

The procedure needs to be amended to include a statement related to who, if anyone, can supersede the specific technical actions of a controller. It must also include the qualification requirements of such person, the conditions or events that would require implementing directing or superseding the technical actions of a controller, and how the event would be documented.

8. § 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. . . .

(b)

(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:

(1)

(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.

Colt Hub's CRMP was not adequate to provide instructions and documentation requirements when conducting a point-to-point verification between SCADA displays and related field equipment when field equipment was added or moved. Section 303 of the CRMP Point-to-Point Verification Process failed to include the following: (1) tag verification to end point device; (2) proximity verification with other devices in the field (for example, transmitter is upstream of valve in field and illustrated correctly in SCADA); (3) whether the point was verified under simulated or live conditions; and (4) the set point alarm verification, including the correct priority, color of the priority, and alarm description. Section 303 also did not contain a statement regarding soft or calculated points and the associated verification.

The procedure must be amended to provide a process to thoroughly conduct and document 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. Also, if the point is a calculated point, verification of correct result and associated alarming must be included.

9. 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. . . .

(b) (d) *Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:

(1)

(4) Establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility.

Colt Hub's CRMP was not adequate to establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility. Specifically, section 402 of the CRMP, entitled "Shift Lengths, Schedules, and Off Duty Time," allowed 7 continuous days of work with 84 hours of work and 36 hours of rest. However, Crestwood indicated that its schedule is not set up for, nor would it operate under, these hours of service. Section 402 did not provide a description of their shift schedule (i.e., a modified Dupont schedule). The procedure seems to suggest that during certain times, including outages, they would move to a different type of shift schedule. The hours-of-service limits do not appear to represent Colt Hub's actual work practices.

The CRMP, section 403, entitled "Deviation and Exception Process for Hours-of-Service Limits," stated, "[o]perations Supervisor or designee may approve deviations to this manual." Section 403 did not describe that the supervisor must approve deviation in advance for anticipated deviations or, in cases where unforeseen events occur, verbal and subsequent written approval should be obtained at the first practical moment after the event.

Additionally, section 404, entitled "Fatigue Mitigation," mentioned designated periods within the shift when fatigue mitigation measures should be implemented, but it did not mention when and how a controller should document the fatigue countermeasures employed.

The procedure needs to be amended to include the shift schedule implemented in the control room and representative hours of service limits. The procedure must also be amended to require documenting the fatigue countermeasures used and when they are used. Additionally, the procedure needs to be amended to include the requirements that hours-of-service deviations be reviewed and approved prior to the event, if possible, or at the first practical moment after the event.

10. 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. . . .

(b)

(c) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations.

Colt Hub's CRMP, under section 507, entitled "Review of Safety Related Alarms [195.446(e)(1-3)], False, Stale or Inaccurate Alarms," was not adequate to ensure alarms were accurate and supported safe pipeline operations. Specifically, the section 507 of the CRMP did not contain a formal process to report inaccurate and malfunctioning alarms. Section 507, stated, "Mangan Inc., as the Colt Hub's Subject Matter Expert (SME) works closely with the controllers and Operations Supervisor and takes the appropriate action when requested to resolve false, stale, malfunctioning, or inaccurate data. Controllers are empowered to contact Mangan Inc. directly and to inform the Operations Supervisor." However, there was no information or reference to the Mangan, Inc. process, how the deficiencies were tracked, how correction progress was monitored, how it was managed to correction, and/or documentation expectations. Also, the procedure mentioned "stale" and "inaccurate" alarms, but did not define them.

The procedure needs to be amended to define the steps a controller needs to take when a false, stale, inaccurate or malfunctioning alarm is identified, which includes initial response, documentation, contact of the appropriate parties to investigate and resolve, and follow-up to ensure closure of the issues.

11. § 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. . . .

(b)

(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations.

Colt Hub's CRMP was not adequate because it did not identify safety-related points. It did identify in sections 504 and 505 that safety-related alarms are Priority 100, Priority 200, and Priority 300, and it only provided limited examples of these points. Without a determination of priority, this procedure indicates that all points are safety-related. A review of the Determination of Alarm Rationalization/Priority provided different priority assignments as P1, P2, P3, and P4 in Table 1: Severity Table. It is unclear whether the two priority sets are the same and just mislabeled or if they represent something different in the alarm rationalization/prioritization process and designation. Additionally, there were alarm levels suggested in Section 504 of the CRMP, but not described. How something is determined to be safety-related is unclear, as safety-related points relate to multiple priorities. For example, if a discharge pressure transmitter is a safety-related points, it is unclear whether all alarm levels are considered to be safety-related or only the HHHI Priority.

The procedure must be amended to define the practice of how a point and alarm is determined to be safety related. The procedure also must include a broad example that identifies the safety-related points for the pipeline systems covered by the CRM Plan and how these are implemented in the SCADA Master Database and presented to the controller.

12. § 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. . . .

(b)

(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1)....

(2) Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities.

Colt Hub's CRMP was not adequate to identify, at least once each calendar month, points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities. The CRMP lacked a process for monthly identification, recording, review, and analysis of points that have been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities. Additionally, the procedure did not require deficiencies identified to be corrected and analysis to be documented.

The procedure must be amended to require identification, recording, analysis, and correction of identified deficiencies of points that have been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities. A record of the monthly results must be maintained.

13. 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. . . .

(b)

(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1)

(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.

Colt Hub's CRMP was not adequate to address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section. Specifically, CRMP section 510 simply stated, "[d]eficiencies identified shall be documented for compliance with requirements, and shall be kept by Operations Supervisor in memorandum or other acceptable form or inspection form. Form # 510 CRM Action Items Plan can also be used."

§ 195.446(e) requires much more than identification and documentation; to address the identified deficiencies, action is required to correct the deficiencies. CRMP section 500 addressed the requirements of §§ 195.446(e)(1) through (e)(5), and each requirement has the potential to identify deficiencies that require correction to ensure alarms are managed to demonstrate compliance. Each method to address the deficiency may be different depending upon the finding. The procedure must be amended to address how identified deficiencies will be addressed for each of the various sections in §§ 195.446(e)(1) through (e)(5).

14. § 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. . . .

(b)

(g) *Operating experience.* Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:

(1) Review accidents that must be reported pursuant to §195.50 and 195.52 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to: (i) Controller fatigue; (ii) Field equipment; (iii) The operation of any relief device; (iv) Procedures; (v) SCADA system configuration; and (vi) SCADA system performance.

Colt Hub's CRMP was not adequate to review accidents that must be reported pursuant to §195.50 and § 195.52 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies to the stated elements. Specifically, CRMP section 700 did not provide a process on how reviews will be conducted and who is responsible for those reviews to determine if control room actions contributed to the event. Section 700 stated, "[t]he company will use O&M procedures to support a root cause investigation," and "[t]he company may use the concepts and procedures described in 'Investigating the Possible Contribution of Fatigue to Pipeline Mishaps'

white paper.” If there is a corporate review process for reportable incident review, it was not referenced. Such a procedure typically will address the items in § 195.446 (1)(i)-(vi). The CRMP procedure only addressed fatigue.

The procedure also did not address who will conduct the review of reportable accidents, pursuant to § 195.50 and § 195.52, nor did it address how the review will be conducted, in order to determine whether control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to: (i) Controller fatigue; (ii) Field equipment; (iii) The operation of any relief device; (iv) procedures; (v) SCADA system configuration; and (vi) SCADA system performance.

CRMP section 702 stated the operator would, “[i]nclude lessons learned from all events into the CRM training Program as appropriate.” The procedure indicated Form 702-1, “Incident Investigation Due to Potential Fatigue,” appears to limit lessons learned to only fatigue.

The procedure must be amended to provide a detailed process of (1) how reviews will be conducted and who is responsible and accountable for the review of reportable events to determine if control room actions contributed to the event; and (2) how to correct identified deficiencies where necessary. If there is a corporate review process, this must be referenced and should include the appropriate coordination with the control room, especially in determination of lessons learned. If that process is not adequate to address the compliance requirements of this section, then amendments must be made to either the CRMP, the corporate plan, or both. Even if the controller did not “cause the event,” at a minimum in the amended procedures, consideration must be given to review of SCADA event log and a review of controller schedules to determine if control room actions contributed to the event.

15. § 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. . . .

(b)

(h) *Training.* Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

(1)

(6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph no later than January 23, 2018.

Colt Hub's CRMP was not adequate to provide training program content and a detailed process for team training of both controllers and other individuals, as defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Specifically, in CRMP Section 803, there was simply a bullet point that stated, "Team Training." The CRMP did not establish who, regardless of location, operationally collaborates with control room personnel. It also did not define the frequency of training, for example, initial training and recurring training. The CRMP also did not provide detail on topics and content that would be required for team training, which must include some type of soft skill training as well as training on the three modes of normal, abnormal, and emergency.

The procedure must be amended to include a list of who, regardless of location, operationally collaborates with control room personnel, a detailed process for team training that includes content or reference to other materials, all three modes of normal, abnormal, and emergency situations, a requirement that at least one controller must participate in all team training sessions, and a frequency for initial and recurring training.

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 Enforcement 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 30 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 that Crestwood Midstream Partners, LP's/Colt Connector Pipeline's (Colt Hub)

maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2024-021-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory Ochs
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration

cc: Eric Amundsen/ SVP Operations eric.amundsen@energytransfer.com
Todd Nardozzi/ Director – Regulatory Compliance todd.nardozzi@energytransfer.com

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings