



Marathon Pipe Line LLC

539 South Main Street
Findlay, OH 45840
Tel: 419.422.2121

Via email

January 9, 2025

Mr. Gregory A. Ochs
Director, Central Region
PHMSA, Office of Pipeline Safety
901 Locust Street
Kansas City, MO 64106

RE: Notice of Amendment
CPF 3-2024-055-NOA

Dear Mr. Ochs,

On September 26, 2024, Marathon Pipe Line LLC (“Marathon,” “MPL,” or “Respondent”) received the above-referenced Notice of Amendment (NOA) alleging inadequacies within Marathon’s plans or procedures for Control Room Management (CRM). This NOA was issued to Marathon by the Central Region of the Pipeline Hazardous Materials Safety Administration (PHMSA) Office of Pipeline Safety (OPS) based on PHMSA’s inspection of Marathon facilities, records, and procedures that occurred between April 17th and May 17th, 2023. PHMSA had extended Marathon’s time to respond to the NOA until January 13, 2025. Please find Marathon's response to the NOA below.

Since the inspection, Marathon has used this time to thoughtfully evaluate and enhance its plans and procedures, aligning them with PHMSA’s recommendations for improvement. Marathon’s efforts reflect a commitment to continuous improvement and a collaborative approach to safety. While Marathon does not concede that its plans and procedures were inadequate to assure the safe operation of its facilities, Marathon submits its written comments and revised procedures without admission and pursuant to 49 CFR § 190.206(a). Marathon also offers comments and explanations, set forth below, regarding each issue identified by PHMSA.

Marathon believes that its amendments to the CRM procedures address PHMSA's concerns and comply with 49 CFR §§ 195.444 and 195.446. Marathon respectfully requests that PHMSA accept Marathon's amendments to the CRM procedures and close this matter. To the extent that PHMSA believes Marathon's revised procedures are inadequate, Marathon would like to set up a meeting with PHMSA to address any concerns.



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Issue 1 – NOA Item 1: §195.444 Leak detection.

- (a) *Scope*. Except for offshore gathering and regulated rural gathering pipelines, this section applies to all hazardous liquid pipelines transporting liquid in single phase (without gas in the liquid).
- (b)
- (c) *CPM leak detection systems*. Each computational pipeline monitoring (CPM) leak detection system installed on a hazardous liquid pipeline must comply with API RP 1130 (incorporated by reference, see §195.3) in operating, maintaining, testing, record keeping, and dispatcher training of the system.

PHMSA Allegation:

Marathon's procedure, entitled "MPL - Leak Detection Program (MPL-GEN-01211-POL)," was not adequate to demonstrate compliance with API RP 1130 section 6.2 (incorporated by reference) and, therefore, was out of compliance with § 195.444(c). Specifically, Marathon did not have procedures that described how the system would be tested or maintained, or how operational data would be continued to be confirmed.

Additionally, Marathon's procedures did not address both the SimSuite RTTM and the SimSuite Stub Line application of flow in/flow out without line pack. The procedure did not include nor require documentation of which of the aspects of API RP 1130 section 4.2 would be implemented by either system and it did not describe the outputs, dynamic alarming, and how the system has been determined to be operating effectively. Record keeping was also not described in a manner specific to either leak detection system, including that for initial test records, periodic test records, or maintenance aspects.

While Marathon did have a process implemented for temporary and permanent changes to its CPM system, the process Marathon used to review and implement these changes has not been documented for the leak detection system. For example, a change can be identified by a controller and exchanged (by email or verbally), identified during a monthly review of CPM alarms performed by the Hydraulic and Leak Detection department and follow-up management meetings as well, or as the outcome of an incident/accident investigation process where the outcome has recommendations that result in the Opportunity for Improvement to be implemented. As described by Marathon during the inspection, Marathon did not have a procedure to track whether controllers were made aware of unusual situations when a CPM Specialist would force a value in the CPM system without the controller's knowledge. Marathon's procedure did not require communication with the controller or communication between controllers during the shift change. Change management and communication to the controller is required by § 195.446(f) and therefore needs to be in Marathon's procedures.



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Marathon also had procedures that were developed and modified as needed in OneNote format. These procedures were not formalized nor approved in the Marathon library of procedures. These procedures, while not written in Marathon's "MPL - Leak Detection Program (MPLGEN-01211-POL)," were referenced and used for important tasks. Marathon's procedures must be amended to describe how the system will be tested and maintained and how operational data will be continued to be confirmed.

Marathon's procedures also need to include the method of documenting and recording how API RP 1130 section 4.2 will be implemented when a system is selected to determine and record it is operating effectively and how it will be initially tested, undergo periodic tests, and maintained on an ongoing basis, as well as recording the tests. Marathon's procedures must also include a description of the practice in place to document temporary and permanent changes to the CPM system that also includes communication to controllers unusual situations that may occur which a controller may not be aware of, such as when a CPM Specialist would force a value in the CPM system. The CPM manual also needs to be updated with the OneNote information and re-established.

Marathon's Response:

Marathon's leak detection methods, including CPM and other methods, are governed by *MPL – Leak Detection Program (MPL-GEN-01211-POL)* (Available in SharePoint). *MPL – Leak Detection Program (MPL-GEN-01211-POL)* Section 6 incorporates *MPL – CPM System Compliance (MPL-DOT-00163-POL)* (Available in SharePoint), which states that Marathon will comply with API RP 1130. Per *MPL – CPM System Compliance (MPL-DOT-00163-POL)*. Marathon uses *MPL API RP 1130 Compliance Tracking Document* (Available in SharePoint) to provide specific details regarding how Marathon will comply with API RP 1130. Sections 6.2 and 6.3 of the *MPL API RP 1130 Compliance Tracking Document* identify how Marathon will test, maintain, and continue to confirm operational data. Marathon would like to clarify further that "SimSuite Stubline" is the same as "SimSuite RTTM" and, as described, this system must comply with the requirements of API RP 1130.

As noted by PHMSA, Marathon utilized procedures housed in OneNote at the time of the inspection. Though not in the Document Management System (DMS) format, the OneNote procedures were procedures, and the formatting of procedures exclusively in the DMS format is not a regulatory or procedural requirement. The OneNote procedures were reviewed during their use and updated when changes were needed. Marathon has since transitioned the OneNote procedures into the DMS procedure format. For example, the following procedures, related to the concerns in Issue 1, transitioned from OneNote to DMS:



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- *CPM System Testing (MPL-DOT-01875-PRS)* (Available in SharePoint) – In accordance with API RP 1130, Section 6.2, this procedure defines the process for initial testing (Section 6.0), defines the process for periodic retesting (Section 7.0), defines the process of change driven testing including changes to operator configuration, maintenance, and system updating processes (Section 8.0) and defines the process for maintaining testing records (Section 10).
- *Computational Pipeline Monitoring Systems (MPL-MNT-01890-KNO)* (Available in SharePoint) – As addressed in API 1130, Section 4.2, specifies the features of a CPM system. Section 5 details requirements to meet Marathon standards for a CPM system, and how Marathon uses these features. Additionally, Section 5.0 specifies the process for feature selection using *MPL - Leak Detection Adequacy Risk Assessment Process (MPL-DOT-00477-PRS)*.

Marathon has also developed a new procedure to address PHMSA's concerns about implementing API RP 1130 section 4.2. *CPM System Management of Change (MPL-MNT-01893-PRS)* (Available in SharePoint) defines the required communication processes for permanent changes, temporary changes, algorithmic tuning, temperature tuning, and pressure tuning.

Issue 2 - NOA Item 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) A controller's authority and responsibility to make decisions and take actions during normal operations;

PHMSA Allegation:

Marathon's procedure, entitled "MPL Pipeline Operations Center Control Room Management Plan, Effective Date: 08/25/2022" (CRM Plan), was not adequate because it did not define the controller's authority and responsibility to make decisions and take actions during normal operations when controllers assigned to the project desk moved systems from and back to the primary controller console, per § 195.446(b)(1).



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The CRM Plan needs to be amended to include what conditions prompt moving systems from the primary console to the project desk and how responsibilities for systems shift when moved to and returned from the project desk. For example, the procedure needs to define for the systems transferred to the project desk the roles, responsibilities, and authority for the controller to send commands, respond to alarms, dispatch field personnel, or make emergency notifications. Consideration must also be provided for shift change whenever systems are changed between consoles and if monitoring extends over normal shift period changes.

Marathon's Response:

Marathon drafted a procedure during the inspection to address the concerns identified by PHMSA in Issue 2 and shared the procedure with PHMSA on June 26, 2023 to fulfill PHMSA's Data Request Item #13. *See Reference #13 – Project Specialist Procedure.pdf* (Available in SharePoint). PHMSA requested additional changes to the procedure on March 27, 2024. Marathon made the requested changes and submitted the revised draft procedure on April 3, 2024. *See Reference #13 – Revised Project Console Activation Process.pdf* (Available in SharePoint). The revised procedure addresses PHMSA's concerns.

Issue 3 – NOA Item 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)
- (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) Implement API RP 1165 (incorporated by reference, see § 195.3) whenever a SCADA system is added, expanded, or replaced, unless the operator demonstrates that certain provisions of API RP 1165 are not practical for the SCADA system used.

PHMSA Allegations:

Marathon's CRM Plan was not adequate to define when API RP 1165 (incorporated by reference) was to be implemented whenever a SCADA system is added, expanded, or replaced, per §



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195.446(c)(1). Additionally, the procedure did not provide a method to verify that API RP 1165 had been implemented. CRM Plan section 5.5 did not provide definitions or examples of added, expanded, or replaced to guide when API RP 1165 must be implemented.

Section 5.4 stated, “each SCADA Display Style Guide documents how the various suggestions and recommended practices contained in API RP 1165 edition 1 have been incorporated into MPL’s SCADA system as well as recommended SCADA administration directives contained in API RP 1165 edition 1.” Marathon’s position was that since the SCADA Display Style Guide demonstrated compliance with the recommended practices of API RP 1165, Marathon implemented its style guide in its SCADA design. What the procedure did not include was a verification process that API RP 1165 continued to be implemented when there were additions, expansions, or replacements to the SCADA system.

The procedure needs to be amended to provide definitions and examples for added, expanded, and replaced as well as a process to verify API RP 1165 was implemented when there are additions, expansions, or replacements to the SCADA system. This should also include verification of the SCADA Display Style Guide when amendments are made that relate to suggestions and recommended practices contained in API RP 1165.

Marathon’s Response:

Marathon’s *MPL Pipeline Operations Center Control Room Management Plan* (“CRM Plan”) (Available in SharePoint) requires that all SCADA systems used by Marathon comply with API RP 1165, including when Marathon makes additions, expansions, or replacements to the SCADA system. Marathon updated the procedure on June 13, 2023, to include examples of additions, expansions, or replacements to improve clarity. Marathon submitted this updated Control Room Management plan to PHMSA on November 3, 2023.

To provide further detail, Marathon utilizes its Management of Change (MOC) system for any SCADA changes, including additions, expansions, or replacements. The MOC process requires that all changes to SCADA displays are made in conformance with *MPL -SCADA Display Style Guide (MPL-GEN-01460-DGS)* (Available in SharePoint) or API RP 1165. Marathon’s *MPL-SCADA Display Style Guide (MPL-GEN-01460-DGS)* is reviewed once per calendar year, not to exceed 15 months. That review includes ensuring any changes or amendments align with API RP 1165.

Issue 4 – NOA Item 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



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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;

PHMSA Allegations:

Marathon's CRM Plan was not adequate to distinguish all points that were categorized as safety related in the SCADA database and how, from this list, safety related alarms and set points are determined, per § 195.446(e)(1). PHMSA reviewed Marathon's Safety Related SCADA Points implemented in the SCADA database related to flow, cavern pressures, and cavern levels and determined that these points were not included in the list of safety related points provided in section 10 of "MPL - SCADA and Field Control Systems Point-to-Point Verification Process (MPL-OPR-01598-PRS) Effective Date: 06/30/2023." Section 11.4 of Marathon's "MPL Pipeline Operations Center Alarm Management Effective Date: 05/02/2023" (ALMP) referenced this section as, "[T]he list of safety related points." Points were aggregated into naming groups, for example, Leak Detection, Mainline Pressures and Flow Rates and Tank Elevations. The points had a variety of names that describe these categories. A review of the SCADA Safety Related Alarm List indicated that one of the naming groups, CPM Leak Warning, was not a safety related alarm. In the data base, there were several alarms that may have been the same event, but were described differently. The alarms: Leak Flow Average Period (1-4), Volume Difference Average Period (1-4), and Flow Difference Average Period (1- 4) all could be referring to the same event and it was unclear in Marathon's procedure what they referred to.

Section 11.3 of the ALMP provided a simple 4 step process to determine which alarms received by the Pipeline Operations Center (POC) would be classified as Safety Related Alarms. These steps were: (1) Identify (Plan), (2) Evaluate (Do), (3) Integrate (Check), and (4) Audit (Adjust). There was no further reference or guidance on what these steps entail. Section 18.4, titled "Alarm Justification Process," stated, "[t]he justification process includes determining if the alarm should be designated as a Safety Related Alarm." Step 4 of this process stated, "ANSWER the justification questions to determine if the new or modified alarm fits the requirements to be considered a Safety Related alarm." The procedure seemed to require some type of document that provided very specific questions with associated scoring for the various determinations, but this was not referenced in the procedure. Section 11.5 of the ALMP provided criteria to determine if the alarms are safety related.



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It was unclear if this section related to Section 18 of the ALMP. While Marathon may have an expanded practice for safety related alarm determination it was not fully formalized in procedure.

The procedure must be amended to include all safety related points implemented in the data base and further define the process for determination of safety related alarms.

Marathon's Response:

Marathon's *SCADA and Field Control Systems Point-to-Point Verification Process (MPL-OPR-01598-PRS)* (Available in SharePoint) included flow rates as a safety-related point. The caverns at issue are not DOT jurisdictional. Marathon has revised its four-step process for determining safety-related alarms within the Alarm Management Plan (AMP). See *Reference AMP_2024 NOA Updates.pdf* (Available in SharePoint). Revised section 11.3 refers the standard user to the Alarm Justification Process in section 18.4 of the AMP, which consists of questions designed to facilitate making Safety-Related Determinations.

Marathon's omission of CPM Warning from the SCADA safety-related alarms list was intentional. Marathon set its CPM Warning threshold to half the CPM Leak alarm threshold. The warning may indicate several items, such as a problem with inputs to the CPM system or a calculated leak rate below the confidence level of the CPM's system's detection capabilities. Marathon's philosophy is that CPM Warnings and CPM Leak Alarms should be investigated thoroughly, consistent with API RP 1130. The CPM Leak Alarm is the safety-related alarm, as this alarm meets the system's detection threshold.

The Leak Flow Average Period (1-4), Volume Difference Average Period (1-4), and Flow Difference Average Period (1- 4) referenced in Issue 4 are not alarms; rather, these periods are points that are calculated in the CPM system. The data associated with these points is displayed in CPM System Trends within the CPM system but does not individually alarm in CPM or SCADA. In CPM, Flow Difference plus Volume Difference equals the Leak Flow. If Leak Flow exceeds the CPM leak alarm threshold, the CPM system enters a state of alarm. In the next SCADA poll, CPM communicates the alarm state, and a CPM Leak alarm is presented in SCADA. Leak Flow, Volume Difference, and Flow Difference are never presented to a controller as an alarm. They are not specified for analysis in the alarm response to either CPM Warning or CPM Leak.

To address PHMSA's remaining concerns in Issue 4, Marathon has updated Sections 11.3, 11.5, and 18.4 in *AMP_2024 NOA Updates.pdf*.

Issue 5 – NOA Item 5: §195.446 Control Room Management



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- (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.

PHMSA Allegations:

Marathon's ALMP was not adequate to provide a monthly review of points affecting safety that had had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities per § 195.446(e)(2). Specifically, section 23.3 of the ALMP required monthly review of: (1) Alarms were forced to a manual value, (2) Alarms were inhibited, (3) Alarms were taken off scan (4) False/Malfunctioning Alarms. Section 195.446(e)(2) requires review of points affecting safety which may have a direct result on alarming.

Additionally, the operator was pulling from the SCADA data base using a third party solution. Thus, the field can place points off scan or forced/manual so the information to the controller is not displaying live information. Manual or forced points in field programmable logic controllers (PLCs) were not being identified and reviewed in the monthly review activity. Additionally, these data related to the various reviews of these conditions were to be measured "[a]gainst the KPI Metrics and Targets identified in the Alarm Philosophy." Section 12 of the ALMP did not meet the requirements of § 195.446(e)(2) which requires operators to review their SCADA events and logs related to these conditions and to verify the conditions did not exist "[f]or periods of time exceeding that required for associated maintenance or operating activities." The ALMP is missing this requirement.

Marathon's procedure needs to be amended to correct the monthly review requirement from alarms to points where appropriate. The process also needs to be amended to include identification of points affecting safety that were placed in forced or manual in field devices for periods of time exceeding that required for associated maintenance or operating activities. This also must include the date the



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points were taken off scan, placed in forced or manual mode, had the alarm inhibited and when they were returned to normal state to support the review and analysis to verify the conditions did not exist for periods of time exceeding that required for associated maintenance or operating activities.

Marathon's Response:

Section 12.3 of Marathon's MPL Pipeline Operations Center Alarm Management Plan ("ALMP") states that Marathon will routinely monitor and evaluate the performance of alarm system data and alarm reports. Per the plan, routine monitoring includes "Stale Alarms and Points." The stale alarms and points will be noted on the monthly report. Section 23.0 – "Monitoring and Assessment" covers details regarding the monthly reports. Marathon does not use the term "point" in Section 23.3 to reference the items included in the monthly review. However, the intent and practice include points and alarms, as demonstrated by its records. In addition, Marathon has revised the ALMP to clarify its process. *See AMP_2024 NOA Updates.pdf.*

PHMSA alleges that Marathon's plan lacks a requirement to evaluate the time frame points or alarms in a manual or inhibited state to ensure that the time frame does not exceed that required for associated maintenance or operating activities. Marathon has drafted revisions to the ALMP to clarify our process. *See AMP_2024 NOA Updates.pdf.*

Additionally, PHMSA states that Marathon's plan does not include the monthly review of points affecting safety that had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities per Section 195.446(e)(2). Marathon conducted a review and identified that its Alarm Scorecard indicated that this task was performed. The Alarm Scorecard contained the required information, including the date/time taken off scan, placed or forced in manual mode, when the alarm was inhibited, and when it was returned to normal.

With respect to manual or forced points in PLCs, Marathon's Controls and Automation group runs a report to monitor these conditions. Marathon has drafted a revision to Section 22.3 in *AMP_2024 NOA Updates.pdf* to include these reports in the monthly review.

Issue 6 – NOA Item 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. . . .



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(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.

PHMSA Allegations:

Marathon's ALMP was not adequate to define how deficiencies identified through the implementation §§ 195.446(e)(1) through (e)(5) would be addressed. Section 23.5, entitled "Alarm Deficiencies," defined a deficiency as "1) An instance where a KPI metric fails to meet the identified target value or 2) A post-incident investigation where the root cause or a contributing cause was determined to be the SCADA alarm system or the controller's usage of the SCADA alarm system." Section 23.6 provided a process for resolving monthly alarm deficiencies. This is a very simple 4-step process.

However, in practice, controllers reported issues related to SCADA and issues on alarm maintenance through a ticket process. This could include malfunctioning alarms, repeating communication issues or false alarms. Neither aspect seemed to be tracked to completion as work orders or tickets could be accepted or not for maintenance in the field by supervisors. Different ticket systems existed for different locations, and there was no person assigned to verify that issues were addressed promptly.

Marathon's procedures need to be amended to describe how deficiencies identified in the alarm management plan effectiveness review, monthly safety related points review, and review of alarm set point and descriptions and general daily operating conditions need to be addressed in how they will be documented and corrected when identified. There may be a variety of methods depending upon the deficiency finding. Procedures need to include the ticketing practice in place as well as periodic review and action plans to correct deficiencies.

Marathon's Response:

For clarity, Marathon's SAP WO tickets functioned differently from those described in Issue 6. Support for the pipeline operations center was not dispatched or controlled through the ticketing process; rather, verbal and electronic notification is documented and tracked via the shift report system. Tickets were created as a time-tracking tool for field personnel and equipment maintenance costs. SCADA personnel, for example, are not notified through the SAP WO tickets.

The shift report functioned to document, resolve, and track issues and deficiencies. If an issue is resolved on the same shift as its occurrence, the controller may document the resolution within the



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same shift report entry as the issue; if resolution occurs on a different shift than the initial shift report entry, the resolution documentation will be documented on the shift report entry on the resolution date. Therefore, item resolution was tracked, but not through the SAP WO ticketing system. However, Marathon has drafted a process to also document SAP WO ticketing resolution in Section 20.7 of *AMP_2024 NOA Updates.pdf*.

PHMSA alleges that Marathon's plan did not include how deficiencies were identified in the alarm management plan effectiveness review, monthly safety-related point review, and review of alarm set point and descriptions and general daily operating conditions need to be addressed in how they will be documented and corrected when identified. Marathon's Alarm Management Plan that was in place at the time of the inspection included how the deficiencies identified during the alarm effectiveness review and monthly review would be addressed in Section 25.5 - *Addressing Deficiencies Found in Alarm Effectiveness Review* and Section 23.6 - *Process for Resolving Monthly Alarm Deficiencies*, respectively. Marathon has since revised its Alarm Management Plan to improve clarity. Sections 25.5 and 23.6 from the Alarm Management Plan in place at the time of the inspection are now Section 24.5 and 22.6. See *AMP_2024 NOA Updates.pdf*. Marathon has also updated Section 22.5 to address how alarm set points and descriptions deficiencies will be addressed.

Marathon has revised its Alarm Management Plan to improve clarity. See *AMP_2024 NOA Updates.pdf*.

Issue 7 – NOA Item 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. . . .
- (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 controlled to carry out the roles and responsibilities defined by the operation. In addition, the training program must include the following elements:
 - (1)
 - (5) For pipeline operating setups that are periodically, but infrequently used, providing an opportunity for controllers to review relevant procedures in advance of their application; and



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PHMSA Allegations:

Marathon's procedures were not adequate to demonstrate compliance with § 195.446(h)(5). Marathon's CRM plan section 19.3 stated that, "[t]raining for controllers to carry out their roles and responsibilities, include[es]:...[t]raining on pipeline operating set-ups that are periodically, but infrequently used...[and] [r]eviewing operating procedures in advance of their use." Section 10.4 of "MPL Pipeline Operations Center Training and Qualification Program" stated, "[A]n infrequently used procedure is defined as a procedure that a Controller has not performed frequently enough to be comfortable with executing. In such cases, the Controller will need to review the procedure and seek out additional information, if necessary, before executing. Procedures for all approved operations exist and are accessible through the eDoc (reference) system. Controllers are trained to access and review infrequently used procedures when discussing the eDoc system during their initial training."

What was missing from these procedures is a reference to Marathon's scheduling system, called Polaris practice, executed from scheduling. There were routes schedulers had to select for the batch. If that route had not been executed within the last 24 months it was flagged for the controllers to pull up a Pipeline Management of Change (PMOC) and signals to SCADA to make sure there weren't any changes over the last two years that would impact the POC ability to make that move. The procedure did not provide enough detail to adequately capture Marathon's actual practices. Marathon considers all procedures as current, even if not used for 24 or more months. The controller needs to be alerted through the Polaris system to determine if it is infrequent to review the procedure. This Polaris practice was not a procedure in the CRM plan.

The procedure needs to be amended to provide a detailed process of Marathon's Polaris practice currently executed from scheduling to support review of the appropriate routing operating procedure, how the controller is alerted to the condition, and ample time for the controller to review and ask questions.

Marathon's Response:

Marathon has revised its Training and Qualification Plan to address Issue 7. Please reference Section 10.4.1 in *Training and Qualification Plan Update_2024.pdf* (Available in SharePoint).



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Conclusion

As stated, Marathon made the changes described without admission and respectfully believes that its amendments and new procedures comply with 49 CFR §§ 195.444 and 195.446. Marathon requests that PHMSA close this matter. If you have any questions, require further information, or would like to set up a meeting to discuss Marathon's response, don't hesitate to get in touch with me.

Marathon is asserting a claim of confidential commercial information regarding the information in the documents added to SharePoint as they are trade secrets and proprietary business information. As such, they are for Agency use only and have been marked "Confidential and Other Information Protected Under Law—Do Not Disclose to Public or Other Third Parties." The provided documents contain information exempt from public disclosure under 5 U.S.C. §552(b).

Marathon shares PHMSA's desire to ensure public safety and enhance pipeline system integrity and is committed to working with PHMSA toward those goals. If you have any questions regarding this response or want to discuss further, please do not hesitate to contact me at 419-421-4505 or MiGray@marathonpetroleum.com.

Sincerely,

Michael J. Gray
Environmental Safety Security Compliance Director
Marathon Pipe Line LLC