



Marathon Pipe Line LLC

539 South Main Street
Findlay, OH 45840
Tel: 419.422.2121

Via email

September 18, 2025

Mr. David A. Barrett
Acting Director, Central Region
PHMSA, Office of Pipeline Safety
901 Locust Street
Kansas City, MO 64106

RE: Notice of Amendment
CPF 3-2025-005 NOA

Dear Director Barrett,

On June 16, 2025, Marathon Pipe Line LLC (“Marathon,” “MPL,” or “Respondent”) received the above-referenced Notice of Amendment (NOA), alleging inadequacies found within its plans or procedures. 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’s records and procedures that occurred between April 17 and May 17, 2023. Marathon is submitting this response under 49 C.F.R. Part 190 Subpart B.

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 at the time of the inspection in 2023 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 § 195.446. Additionally, due to the passage of time since the inspection in 2023, Marathon has made many enhancements to its plans not required by this NOA, and its procedures are significantly different from those in place at the time of the inspection. 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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NOA Item 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....

(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;

PHMSA Allegation:

Marathon's procedure, "MPL-OPR-01598-PRS" (August 25, 2021, amend. June 30, 2023), cross-referenced in its "MPL Pipeline Operations Center Control Room Management Plan" (August 25, 2022, amend. October 05, 2023) (CRM Plan) section 6.4, was not adequate to describe the requirements for thorough documentation of point-to-point (P2P) verification per § 195.446(c)(2).

"MPL-OPR-01598-PRS" failed to include instructions for the verification and documentation of the values and states between the SCADA system and field end device. It also failed to include a requirement for these conditions to match. "MPL-OPR-01598-PRS" provided an example of verification in section 5.2, "End to End Verification," that stated, "[c]ompare the readings on a pressure transmitter in the field to the readings of the SCADA display." Prior to this, section 5.2 noted, "[t]he tolerance of field displays and data communication latency should be taken into consideration when comparing end device displays to SCADA." This language suggested the information between the end device and SCADA can be different and that result would be considered acceptable to Marathon. Thus, section 5.2 allowed Marathon's controllers to accept potentially inaccurate information, which could cause a controller to have to perform their roles and responsibilities of operating the pipeline safely without the best information.

PHMSA reviewed Marathon's P2P records for Robinson Rio 81 and identified that several elements, including adequate description, were missing from the verification documentation, which was required to be recorded pursuant to "MPL-OPR-01598-PRS." For example, Marathon did not document (1) the details of which displays were verified, (2) the actual status or value observed in the field and SCADA (the same response was documented for analog, set



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point and control points), or (3) the exact same date and time was documented for all 5 points. Thus, Marathon failed to (1) provide adequate instruction to its controllers to conduct P2P verification between SCADA displays and related field equipment and (2) maintain appropriate documentation of P2P verification to determine compliance, per the requirements of §§ 195.446(c)(2), (j)(2).

Marathon must formalize its procedures to provide a thorough P2P verification that includes instructions to support consistency and ensure records are maintained to demonstrate all the elements verified pursuant to § 195.446(j)(2).

Marathon's Response:

Marathon has voluntarily amended the *MPL - SCADA and Field Control Systems Point-to-Point Verification Process (MPL-OPR-01598-PRS)* (Exhibit A) to address PHMSA's concerns. The *SCADA and Field Control Systems Point-to-Point Verification Process* now includes instructions for the verification and documentation of the values and states between the SCADA system and the field end device. See Section 8.0, Documentation. Marathon does not agree that the language regarding consideration of latency in Section 5.2 implies that it would allow controllers to "accept potentially inaccurate information." Rather, as used in this context, *SCADA and Field Control Systems Point-to-Point Verification Process* requires consideration of the time it takes for data to travel from one place to another, not that a controller would accept inaccurate information. To prevent confusion regarding these instructions, Marathon has removed the "latency" terminology in Section 5.2.

Marathon has addressed PHMSA's concerns that it allegedly did not document the: (1) the details of which displays were verified, (2) the status or value observed in the field and SCADA, or (3) the exact same date and time was documented for all points. To address these concerns and provide clarity, Marathon has added more detailed documentation instructions in Section 8.

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. . . .
- (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)



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(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;

PHMSA Allegation:

Marathon's CRM Plan detailing its internal communication plan was not adequate to demonstrate compliance with § 195.446(c)(3). Specifically, Marathon's "Internal Communication Plan for Manual Operation" did not provide adequate means for manual operation of the pipeline safety, nor did it require adequate documentation of its tests of its internal communication plan at the regulatory timeframe to demonstrate compliance.

During the inspection, Marathon stated its policy was to not move product manually through the pipeline system once it manually shuts down the pipeline systems in the event of a SCADA loss. Section 7 of the CRM Plan referenced sections 3.4 and 12.1 of Marathon's "Operations & Logistics Business Continuity Plan" (July 10, 2023) (O&LBCP), which described the responsibilities of the controllers during a SCADA failure; however, that description did not match what was provided in the CRM Procedures. O&LBCP sections 3.4 and 12.1 did not include detail of what was expected of the controllers during manual operation. Marathon mentioned, during the inspection, that it has its pipeline systems listed to track what has been shut down, but this was not required in either the CRM Plan or O&LBCP. Marathon also did not define who it was that updated this list as systems are communicated as being shut down. The O&LBCP did not address who oversaw reporting field data, the frequency of these reports, or where this information should be recorded for pipeline systems that are still operating. Even when product is not flowing, the pipeline is still considered in operation, and Marathon is still required to patrol and have leak detection in place during the shutdown. Both the CRM Plan and O&LBCP failed to include requirements to report and document abnormal operating conditions, emergencies, and leaks.

Marathon did complete tests of its "Internal Communication Plan for Manual Operation" of the pipeline systems for the years 2020, 2021 and 2022. However, Marathon did not maintain records that were adequate to demonstrate compliance with its procedures or § 195.446(c)(3). In 2020 and 2021, Marathon's records demonstrate that it only completed a portion of the plan by making the "send word now" notification calls and asking employees to review their roles. This was not an adequate demonstration that a full test of Marathon's Internal Communication Plan for Manual Operation was completed.

In 2022, Marathon only conducted a tabletop exercise which was not adequate to demonstrate compliance with § 195.446(c)(3). Per Marathon's records, the tabletop exercise had a mix of



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individuals representing different work groups in the session. The session utilized the question/answer process to review procedures. A pre-populated list, by console, was provided to support the drill and identified which systems were currently running to know which systems needed to be shut down. The tabletop exercise did not cover calling in to the control room to manually document field conditions during the shutdown. The control function went to field personnel, which is cause for concern considering the control room personnel are the subject matter experts on managing the system holistically. Not engaging the control room to manage shut down status and monitor for leaks through patrolling and pressure monitoring is a failure of the testing process. Thus, Marathon's CRM Plan did not provide adequate means for manual operation of the pipeline safely, nor did it require adequate documentation of its tests of its internal communication plan at the regulatory timeframe to demonstrate compliance with § 195.446(c)(3).

Marathon must develop an internal communication plan for the safe manual operation of the pipeline and a procedure to test the plan once each calendar year, not to exceed 15 months. The plan must include verification that the pipeline systems have been shut down, accommodations for leak detection while the line is in the operating status of shutdown, identification of key operating points that will be monitored and methods to report and document field conditions.

Marathon's Response:

Marathon has made several updates to address PHMSA's concerns. The *MPL Pipeline Operations Center Control Room Management Plan* (CRM Plan) (Exhibit B) has been revised to reflect Marathon's current approach to SCADA failure through manual operations directed by the Pipeline Operations Center (POC), with field personnel locally managing pipeline operations. Since the inspection, Marathon has also developed an *Internal Communication Plan* (ICP) (Exhibit C), integrated with the *Operations and Logistics Business Continuity Plan* (O&L BCP) (Exhibit D). The ICP addresses PHMSA's concerns by including POC Controllers, POC Specialists/Leads, and POC supervisors' roles and responsibilities consistent with Section 2.0 of the CRM Plan.

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. . . .



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(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)

(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months; and

PHMSA Allegation:

Marathon's CRM Plan section 8 for testing any backup SCADA systems was inadequate because (1) it did not require enough detail to demonstrate compliance, (2) the tests did not include a test of the backup system, and (3) the procedures were not formalized nor subject to review. As a result, Marathon failed to maintain records adequate to demonstrate that it complied with the regulatory timeframe for testing its backup SCADA system at least once each calendar year, not to exceed 15 months, per the requirements of § 195.446(c)(4).

PHMSA reviewed Marathon's records for its monthly failover of the SCADA servers. Some of the records only included the dates but not the initials of the person who conducted or verified the test. These records included visits to the "hardened area" of the control room. These records were created by the SCADA Team, rather than by the control room, so there was no test of the backup system provided. It is important to document which employee(s) did the work as well as the date the work was completed. The SCADA Team developed procedures for these tests, but those procedures were not formalized or controlled. These procedures were only maintained on One Note. Because these procedures were essential for maintaining the SCADA system and related to compliance, they need to be formalized, controlled, and subject to review.

Marathon conducted a test of Bluffton in fall 2020, spring 2021, and fall 2021. However, Marathon did not provide any documentation, other than shift schedules, for these tests conducted in 2020 and 2021. Shift schedules are inadequate to provide adequate detail documenting the test to demonstrate compliance with the requirements of § 195.446(c)(4).

Marathon conducted tests in 2022, between April 6 and April 13. Marathon documented the test through a survey completed by the controller who participated in the test. While the survey asked for responses to certain questions, it did not provide enough detail of what was tested to demonstrate that an adequate test was completed. For example, the survey did not include (1) what commands were sent, (2) which alarms were acknowledged, (3) whether printers were working, (4) whether IT business computers were working, (5) whether monitors were working, (6) whether all comms were working, etc. The CRM Plan, section 8.4, required, "documentation of the BPOC activation [to] be recorded using the POC Backup Activation Checklist and maintained by the POC performing the BPOC." Thus, Marathon's procedures were inadequate



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to demonstrate that tests of backup SCADA systems were conducted adequately and within the regulatory timeframe specified in § 195.446(c)(4).

Marathon must formalize its procedures used to perform the monthly failover test and documentation. It must also develop procedures to test the backup SCADA system, including the functioning backup center, server, and all equipment that makes up the back up control center. The amended procedure must require documentation of the test, including, but not limited to, identifying the functioning server during the test, start and end time, controller(s) on duty, alarm/event function, phones, command functions, etc.

Marathon's Response:

Marathon has addressed PHMSA's concerns as follows:

- 1) Marathon has created and implemented *MPL - GE SCADA Failover Process* (MPL-PCS-01873-PRS) (Exhibit E). The tests are documented in the *SCADA Evidence Spreadsheet* (Exhibit F), which contains information such as the initials of the person who conducted the review. Further, the *SCADA Evidence Spreadsheet* documents the information requested by PHMSA to demonstrate compliance with the requirements of § 195.446(c)(4).
- 2) Marathon developed a procedure to conduct a full test of the backup SCADA system with its *Quarterly BPOC Activation Test* (Exhibit G) and the *POC Backup Activation Checklist* (Exhibit H).
- 3) Marathon has formalized its procedure via the implementation of *MPL - GE SCADA Failover Process* (MPL-PCS-01873-PRS).

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 written control room management procedures that implement the requirements of this section. . . .

(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)



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(3) Verify the correct safety-related alarm set-point values and alarm descriptions when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months;

PHMSA Allegation:

Marathon's "Alarm Management Plan" (May 2, 2023) (ALMP) and its CRM Plan were not sufficiently detailed to adequately verify the correct safety-related alarm set-point values and alarm descriptions at least once each calendar year, but at intervals not to exceed 15 months, per § 195.446(e)(3). As a result of its inadequate procedures, Marathon did not provide records to demonstrate they verified all safety related alarms each calendar year not to exceed 15 months for the years 2020, 2021, and 2022.

Sections 13.4 of the CRM Plan, 22.2, and 22.5 of Marathon's ALMP provided that, "Safety Related alarm setpoint values and alarm descriptions (SCADA names) must be verified at least once each calendar year, but at intervals not to exceed 15 months." Section 22.5 of the ALMP stated "Work Orders are assigned for Safety Related alarms that need to be tested and verified and to each field location where those alarms exist." Marathon indicated to PHMSA during the inspection that Work Orders are created for all alarms, whether the alarm requires field testing or not. Marathon relied on the field work order activity and field process to demonstrate compliance. Marathon provided two procedures to demonstrate the process of set point verification: Major Pressure Relief valve DOT inspection Task List (Task List) and MPL – Pressure Control Device DOT Compliance (MPL MNT-00966-PRS). Step 3 of the Inspection Procedures section of the Task List directed the field technician to "[n]otify the OC (Operations Center) to 'Off Scan' the device being inspected." Taking the point off scan in SCADA system will result in no alarm being received in the control room from the field PLC. MPL MNT-00966-PRS section 4.1, "Roles and Responsibilities for the Technician," stated, "[a]t the end of the inspection of the pressure monitoring devices, [the technician must confirm] with the POC or MPC equivalent the correct receipt of the data points by the POC." There is conflict between these two documents that undermined determination of compliance. The execution of Step 3 renders the information required for in section 4.1 unobtainable. While individual alarm verifications were presented for inspection, Marathon did not provide a record that confirmed all points had been verified each calendar year not to exceed 15 months. Marathon did indicate to PHMSA, following the inspection, that it did monitor alarm verifications monthly through administrative reports, however, no such reports were provided for inspection. Additionally, the process defined through Marathon's procedure did not verify the correct safety related alarm description, as required by § 195.446(e)(3).



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Marathon also has a CPM Leak Detection system that generates alarms which are passed to SCADA in digital format to present to the controller. The alarm set point is not static, rather it is dynamic and is based on complex algorithms and coefficients. Marathon personnel indicated they review the false alarms frequently and adjust coefficients to support improved leak detection alarming accuracy. These are safety related alarms, as acknowledged by Marathon and have not been part of the work order process for all other alarms described in the process above. Thus, Marathon did not provide a record that it verified the all safety-related alarm set-point values and alarm descriptions were correct when associated field instruments were calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months, per the requirements of § 195.446(e)(3).

Marathon must amend its “Alarm Management Plan” (May 2, 2023) (ALMP) and its CRM Plan in detail to verify the correct safety-related alarm set-point values and alarm descriptions at least once each calendar year, but at intervals not to exceed 15 months, per § 195.446(e)(3).

Marathon’s Response:

To address this item, Marathon added a requirement to its *Alarm Management Plan* (Exhibit I), which details the review of safety-related alarms. The review of safety-related alarms will be documented in a review spreadsheet, which will be reviewed once per calendar year, not to exceed 15 months.

Conclusion

As stated, Marathon made the changes described without admission and respectfully believes that its amendments and new procedures comply with PHMSA’s regulations. 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



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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

Exhibits:

- A: SCADA and Field Control Systems Point-to-Point Verification Process (MPL-OPR-01598-PRS)
- B: Pipeline Operations Center Control Room Management Plan
- C: Internal Communication Plan
- D: Operations and Logistics Business Continuity Plan
- E: GE SCADA Failover Process (MPL-PCS-01873-PRS)
- F: SCADA Evidence Spreadsheet
- G: Quarterly BPOC Activation Test
- H: POC Backup Activation Checklist
- I: Alarm Management Plan