



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

901 Locust Street, Suite 480  
Kansas City, MO 64106

## NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: [rjstamour@marathonpetroleum.com](mailto:rjstamour@marathonpetroleum.com);  
[migray@marathonpetroleum.com](mailto:migray@marathonpetroleum.com); [mlbailey@marathonpetroleum.com](mailto:mlbailey@marathonpetroleum.com)

May 20, 2025

Mr. Rich St. Amour  
President  
Marathon Pipe Line LLC  
539 South Main Street  
Findlay, OH 45840

**CPF 3-2025-013 NOA**

Dear Mr. St. Amour:

From March 18 to March 22 and April 8 to April 11, 2024, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), conducted an onsite inspection of the plans and procedures for integrity management and operations and maintenance of Marathon Pipe Line LCC ("Marathon") in Findlay, Ohio.

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

1. **§ 195.401 General requirements.**
  - (a) . . .
  - (b) **An operator must make repairs on its pipeline system according to the following requirements:**
    - (1) . . .
    - (3) ***Prioritizing repairs.* An operator must consider the risk to people, property, and the environment in prioritizing the correction of any conditions referenced in paragraphs (b)(1) and (2) of this section.**

Marathon's procedures were inadequate for prioritizing repairs on its pipeline system. Specifically, during the headquarters inspection, PHMSA reviewed Marathon procedures, "MPL-MNT-00504-PRS Responding to Anomalies" and "MPL-MNT-00807 Data Analysis of an In-Line Inspection (ILI) Survey." These procedures did not describe how the risk to people, property, and the environment would be considered when prioritizing the correction of

conditions, as required by § 195.401(b)(3). Therefore, Marathon's procedures did not adequately address the requirements of § 195.401(b)(3) and PHMSA proposes Marathon's procedures must be amended to provide guidance on prioritizing repairs based on risk to people, property, and the environment.

**2. § 195.402 Procedural manual for operations, maintenance, and emergencies.**

**(a) . . .**

**(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**

**(1) . . .**

**(13) Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.**

Marathon's procedure "MPL-DOT-00027-PRS, Review for Effectiveness," did not provide adequate guidance to conduct reviews of work done by operator personnel to determine the effectiveness of Operations and Maintenance Procedures (O&M), per the requirements of § 195.402(c)(13). Specifically, the procedure did not include the frequencies for the periodic reviews and did not contain specificity to ensure that an effectiveness review of all O&M procedures required by Part 195 – Subpart F were done. Furthermore, the procedure provided no guidance to the Advisor (Marathon's term for the reviewer) on what is required to determine procedure effectiveness. The procedure simply stated that the Advisor will have the procedure in hand to review for effectiveness. Therefore, PHMSA proposes Marathon must amend its procedure to meet the requirements of § 195.402(c)(13).

**3. § 195.414 Inspections of pipelines in areas affected by extreme weather and natural disasters.**

**(a) . . .**

**(d) *Remedial action.* An operator must take prompt and appropriate remedial action to ensure the safe operation of a pipeline based on the information obtained as a result of performing the inspection required under paragraph (a) of this section. Such actions might include, but are not limited to:**

**(1) . . .**

**(4) Performing additional patrols, surveys, tests, or inspections;**

**(5) Implementing emergency response activities with Federal, State, or local personnel; and**

**(6) Notifying affected communities of the steps that can be taken to ensure public safety.**

Marathon's procedure for responding to pipelines affected by extreme weather and natural disasters did not provide enough guidance to personnel to take prompt and appropriate remedial action to ensure the safe operation of a pipeline, per the requirements of § 195.414(d). Specifically, PHMSA reviewed Marathon's "LS-Extreme Weather and Natural Disaster Guidelines," which is used to respond to the affected areas. Section 12.1, "DOT Jurisdictional Asset Considerations," merely restated § 195.414(d). For §§ 195.414(d)(4) through (6)—

performing additional surveys, implementing emergency response activities, and notifying affected communities of steps that can be taken to ensure public safety, respectively—there was no detail or reference to other procedures on how to carry out these activities. Therefore, PHMSA proposes Marathon must amend the procedure to provide additional details for meeting the requirements of § 195.414(d).

**4. §195.420 Valve maintenance.**

**(a) . . .**

**(b) Each operator must, at least twice each calendar year, but at intervals not exceeding 7 1/2 months, inspect each mainline valve to determine that it is functioning properly. Each rupture-mitigation valve (RMV), as defined in § 195.2 and not contained in a gathering line, or alternative equivalent technology that is installed under § 195.258(c) or § 195.418, must also be partially operated. Operators are not required to close the valve fully during the inspection; a minimum 25 percent valve closure is sufficient to demonstrate compliance, unless the operator has operational information that requires an additional closure percentage for maintaining reliability.**

Marathon’s written procedure did not address the requirement for inspecting all check valves<sup>1</sup> that have been determined by Marathon to be a mainline valve for proper functioning, per the requirements of § 195.402(b). Section 4 of Marathon’s procedure for inspecting mainline valves, “MPL - Valve DOT Compliance Maintenance and Inspection (MPL-DOT-00862-PRS),” referred to a “Mainline Valve Inspection Task List.” Under Section 3.2.5.1 of the Task List, Marathon addressed what to do for a check valve. However, the Task List was written specifically for those check valves that have the capability to manually operate the clapper.<sup>2</sup> The procedure did not address valves that are accessible above ground and do not have a manually operated clapper, nor did it address check valves that are below ground. As such, the check valves would only receive a visual inspection if above-ground. If below-ground, the valves would only see a check for leaks and security at the valve site. No check for proper operation was required per the Task List. Therefore, PHMSA proposes Marathon must amend the Task List in accordance with § 195.402(a) to meet the requirements of § 192.420(b) for all mainline check valves.

**5. § 195.452 Pipeline integrity management in high consequence areas.**

**(a) . . .**

**(h) *What actions must an operator take to address integrity issues? —***

**(1) General requirements. An operator must take prompt action to address all anomalous conditions in the pipeline that the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline’s integrity, as required by this part. An operator must be able to demonstrate that the remediation of the condition will ensure that the condition is**

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<sup>1</sup> A check valve is a valve that closes to prevent backward flow of liquid. Marathon utilizes these valves on one side of a large body of water to prevent backflow of product should a rupture occur in the large body of water.

<sup>2</sup> The “clapper” is the component within a check valve that prevents the backflow of product. It is mounted within the valve on a hinge and blocks the flow of product if the product reverses flow.

**unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with all other applicable requirements in this part in remediating a condition. Each operator must, in repairing its pipeline systems, ensure that the repairs are made in a safe and timely manner and are made so as to prevent damage to persons, property, or the environment. The calculation method(s) used for anomaly evaluation must be applicable for the range of relevant threats.**

**(i) . . .**

**(ii) *Long-term pressure reduction.* When a pressure reduction exceeds 365 days, the operator must notify PHMSA in accordance with paragraph (m) of this section and explain the reasons for the delay. An operator must also take further remedial action to ensure the safety of the pipeline.**

Marathon's procedure was inadequate for recognizing when pressure reductions become long-term and require PHMSA notification, per the requirements of § 195.452(h)(1)(ii). Specifically, Marathon's Integrity Management Program (IMP) procedure, section 2.7.2.3, "Long-term pressure Reduction," did not specify who reviews pressure changes, how pressure changes are tracked or when they are tracked, nor did it provide a mechanism for determining when pressure reductions have exceeded 365 days. Additionally, the procedure did not specify who will provide the required notifications to PHMSA, in accordance with § 195.452(m). Therefore, PHMSA proposes Marathon's procedure must be revised to adequately address the requirements of § 195.452(h)(1)(ii).

#### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 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 CFR § 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 (not mandated) that Marathon 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 A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2025-013 NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

David Barrett  
Acting Director, Central Region, Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration

cc: Michael J. Gray, [migray@marathonpetroleum.com](mailto:migray@marathonpetroleum.com)  
Mandy L. Bailey, [mlbailey@marathonpetroleum.com](mailto:mlbailey@marathonpetroleum.com)

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*