



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

## **REQUEST FOR SPECIFIC INFORMATION**

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 25, 2015

Mr. Tom Rizzo  
Plant Manager  
Shell Puget Sound Refinery  
P.O. Box 662  
Anacortes, WA. 98221

Dear Mr. Rizzo:

During October and November 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Kinder Morgan Canada-Trans Mountain Pipeline System in the state of Washington. Part of this pipeline system contains a breakout tank, T-7, that is located on the grounds of the Shell Puget Sound Refinery.

At the time of the inspection, Kinder Morgan Canada (KMC) could not make available for review all of the required documentation for breakout tank T-7 to ensure compliance with the Pipeline Safety Regulations. KMC stated tank T-7 was currently owned and operated by Shell Puget Sound Refinery and the necessary inspection documentation was not made available from Shell. Pursuant to 49 U.S.C. § 60117 and 49 C.F.R. § 190.203, please provide the following specific information:

1. An agreement between Shell Puget Sound Refinery and KMC reflecting KMC will operate and maintain tank T-7.
2. If an agreement will not be in place, provide all documentation showing compliance with Pipeline Safety Regulations, Title 49, Code of Federal Regulations, Part 195. Documentation must show compliance with:
  - Subpart B – Annual, Accident, and Safety Related Condition Reporting

- Subpart C – Design Requirements
- Subpart D – Construction
- Subpart E – Pressure Testing
- Subpart F – Operations and Maintenance
- Subpart G – Qualification of Pipeline Personnel
- Subpart H – Corrosion Control

Please provide this information to our office within 30 days of your receipt of this letter, and for each document you submit, please provide a copy in electronic format whenever possible. Be advised that all material you submit in response to this request 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).

Pursuant to 49 U.S.C. § 60101 et seq., failure to comply with this request may subject you to enforcement action, including civil monetary penalties and orders to provide records, reports and information.

If you have any questions concerning this request, please contact Dave Mulligan at 720-963-3193.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hoidal". The signature is fluid and cursive, with a large initial "C" and "H".

Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

Activity #149232 (I05)