

TAMPA AIRPORT PIPELINE CORPORATION

P.O. BOX 19201 TAMPA, FL 33686

March 22, 2012

Southern Region
Office of Pipeline Safety
233 Peachtree Street
Atlanta, GA 30303

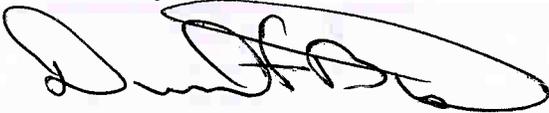
RE: Notice of Amendment (CPF 2-2012-6003M)

TO Whom It May Concern:

I am in receipt of your letter dated February 8, 2012. I have reviewed our Operations and maintenance written procedures and corrected those items identified in your inspection dated November 7-10, 2011. Enclosed are the corrections for your review. Thanks for your support in making our operation safer.

If you should have any questions, please call me.

Sincerely,



Donald F. Byrd
Director of Corporate
Communications and Operations

Cc: Mr. Robert L. Rose President
Mr. Robert A. Wood Regional Manager

RECEIVED MAR 29 2012

CPF 2-2012-6003M

NOA Item #1 – TAPC O&M Manual (Changes identified in RED - Paragraph 4.4 added estimate amount of release procedures and added Appendix #17 to Manual)

4.4 REPORTING ACCIDENTS AND SAFETY-RELATED CONDITIONS 195.50

Title 49 CFR Part 195, Subpart B requires that TAPC report certain types of accidents and safety-related conditions. An Accident Report is required for each failure in a pipeline system in which there is a release of the hazardous liquid transported resulting in any of the following:

- a) Explosion or fire not intentionally set by TAPC;
- b) Release of five (5) gallons or more of hazardous liquid or carbon dioxide, except that no report is required for a release of less than five (5) barrels (0.8 cubic meters) resulting from a pipeline maintenance activity if the release is:
 - (1) Not otherwise reportable under this Section;
 - (2) Not one described in Title 49 CFR Part 195.52(a) (4);
 - (3) Confined to TAPC property or pipeline right-of-way; and
 - (4) Cleaned-up promptly;
- c) Death of any person;
- d) Personal injury to any person necessitating hospitalization or resulting in one (1) or more of the following conditions:
 - (1) Loss of consciousness;
 - (2) Necessary to carry the person from the scene;
 - (3) Necessity for medical treatment;
 - (4) Disability which prevents normal duties or pursuit of activities beyond the day of the accident;
- e) Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of TAPC or others, exceeding \$50,000.

At the earliest practicable moment following discovery of a release of the hazardous liquid transported resulting in any of the above type incidents, TAPC must give telephonic notice of any failure that:

- a) Caused a death or personal injury requiring hospitalization
- b) Resulted in either a fire or explosion not intentionally set by TAPC
- c) caused estimated damage to the property of TAPC or others, or both, exceeding \$50,000.00.
- d) resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards.
- e) In the judgment of TAPC, was significant even though it did not meet the criteria of any other paragraph of this Section.

Telephonic reports shall be made to the National Response Center @ 1-800-424-8802 and must include the following information:

- 1) Name and address of the Operator
- 2) Name and telephone number of the reporting person

- 3) The location of the failure
- 4) The time of the failure
- 5) The fatalities and personal injury, if any
- 6) Initial estimate of amount of product released. Provide initial estimate for amount of product released – refer to TAPC Facility Response Plan, Prediction of Potential Spills for predetermined worst case estimates. Initial estimated release quantity may be determined using metered shipment quantity variances method or line section inventory plus active pumping duration as appropriate. Initial estimate using line inventory plus shutdown time will be computed as follows: length (footage) of 6" line multiplied by 1.5304 gal/per foot plus estimated shutdown time (in seconds) multiplied by 10.0 gal/sec equals estimated amount of product released. See Appendix #17 of this manual for estimated line section product amounts. The estimated release quantity will be updated with follow-up reporting. Amount of released product recovered, source/shipping tank reconciliation, and receiving tank reconciliation if determined should be considered.
- 7) All the other significant facts known by TAPC that is relevant to the cause of the failure or extent of the damages.

APPENDIX A-17 TAPC ISOLATION VALVE SECTIONS (Estimated Line Volume)

Provide initial estimate for amount of product released – refer to TAPC Facility Response Plan, Prediction of Potential Spills for predetermined worst case estimates. Initial estimated release quantity may be determined using metered shipment quantity variances method or line section inventory plus active pumping duration as appropriate. Initial estimate using line inventory plus shutdown time will be computed as follows: length (footage) of 6" line multiplied by 1.5304 gal/per foot plus estimated shutdown time (in seconds) multiplied by 10.0 gal/sec equals estimated amount of product released. The estimated release quantity will be updated with follow-up reporting. Amount of released product recovered, source/shipping tank reconciliation, and receiving tank reconciliation if determined should be considered.

From	To	Size	Length	Gallon	Barrel
Main Pump Station	Valve Pit #1	6 5/8"	14,500	22,190	528
Valve Pit #1	Valve Pit #2	6 5/8"	15,000	22,965	547
Valve Pit #2	Valve Pit #3	6 5/8"	7,900	12,090	288
Valve Pit #3	Valve Pit #4	6 5/8"	678	1,415	25
Valve Pit #4	Valve Pit #5	6 5/8"	3,422	6,274	125
Valve Pit #5	Airport Receiving	6 5/8"	13,940	21,333	508

Pipeline Mileage 10.5 = 55,440 ft

Total Line Volume 84,845 gallons = 2,020 barrels

Initial release formula:

Line section footage X 1.5304 = gallon + Shutdown time (seconds) X 10.0 gal/sec

CPF 2-2012-6003M

NOA Item #2 – TAPC O&M Manual (Changes identified in RED – Requirement added in paragraph 4.3 and Appendix #2)

4.3 INVESTIGATION OF FAILURES 195.50, 195.402(c)(2), 195.402(c)(5), 195.569, 195.585

All operational failures and accidents involving the safety of pipeline facilities shall be investigated and analyzed for the purpose of determining the cause and to minimize the possibility of a re-occurrence. All pipeline breaks, leaks, damages, repairs, fitting failures, or corrosion problems shall be reported. Any time the pipeline is uncovered and/or cut apart for maintenance, the pipeline **must** be inspected and a report made of the conditions found. If the wall-thickness of the pipe has been significantly reduced, appropriate action will be taken.

Whenever any portion of a buried pipeline is exposed, examine the exposed portion for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. Investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion. If pipe is generally corroded that the wall thickness is less than that required of the MOP, replace the pipe. Immediate replacement may not be required if the MOP is reduced commensurate with the strength needed for serviceability based on actual remaining wall thickness or pipe may be repaired by method that reliable engineering tests and analysis show can permanently restore the serviceability of the pipe. If localized corrosion pitting is found to a degree that leakage might result, replace or repair the pipe, unless the MOP can be reduced commensurate with the strength of the pipe based on actual remaining wall thickness in the pits.

A written report shall be made by the field staff investigating a failure or accident when requested by the General Manager. Such reports shall include photographs, sketches, measurements and any other available data that may be pertinent. Sufficient information and data shall be obtained on each failure or accident so that the information required by Title 49 CFR Part 195 can be furnished, should the nature and/or scope of the incident require that it be reported. This information shall be forwarded to the General Manager for notification of the proper agencies.

Information gained by investigation and analysis of failures or accidents shall be considered and utilized to prevent a re-occurrence of failures or accidents from the same cause. It shall be the responsibility of the General Manager to see that each failure or accident involving the safety of pipeline facilities is investigated, the necessary reporting information obtained, a full report made and a specific specimen obtained and preserved for laboratory analysis, when requested.

All pipeline employees shall be responsible for disseminating information that may be helpful in preventing a reoccurrence of a failure or accident from a similar cause. All

records of failures or accidents shall be retained at the S. Hoadley Street Main Transfer Station (Main Transfer Station) for the life of the system.

APPENDIX A-2 - FOREIGN STRUCTURE CROSSING PROCEDURE

Instructions for completion of the FOREIGN STRUCTURE CROSSING REPORT (Form TAPC 02) are as follows:

Each space **must be** completed except that N/A may be used to indicate that information is not available or does not apply. Upon completion, this form is to be returned to Main Transfer Station and will be retained for the life of the pipeline.

1. LOCATION - Enter the applicable pipeline and the area in which the crossing has occurred.
2. COUNTY, TOWNSHIP, RANGE, SECTION, MILEPOST AND CHAINING STATION - Complete these blanks with the applicable information as necessary for site location.
2. NOTIFIED BY/DATE - Indicate how TAPC was informed of the pending crossing and the date of notification.
3. STRUCTURE OWNER/INSTALLING CONTRACTOR - Indicate the names, address, and phone number of the owner of the crossing structure and the contractor responsible for the crossing.
4. TYPE OF STRUCTURE/PRODUCE/SIZE - Indicate the type of structure crossing TAPC pipeline, the product name, if applicable, and the nominal size of the structure.
5. CROSSING DATE - Enter the date of the actual foreign crossing of TAPC facility.
6. CLEARANCE TPC PIPE TO FOREIGN STRUCTURE - Indicate the separation distance between TPC pipe and foreign structure.
7. COVER OVER TOP/FOREIGN STRUCTURE - Indicate the distance from the top of both TAPC pipeline and the foreign structure to original grade.
8. PIPE-TO-SOIL TAPC/FOREIGN STRUCTURE - Indicate the pipe-to-soil potential of TAPC pipeline; if applicable, enter the pipe-to-soil potential of the foreign structure.
9. WAS TEST STATION INSTALLED/TYPE - Check the proper blank to indicate whether or not a test station was installed. If a test station was installed, indicate its type.
10. FEET OF EXPOSED PIPE - Indicate the amount of TAPC pipeline that was exposed for the crossing. Enter "0" if none.

11. TYPE OF COATING – Indicate the type of coating used on the exposed pipe. Enter N/A if it was not necessary to expose TAPC pipeline.
12. GENERAL COATING CONDITION – Check the appropriate box to indicate the condition of any exposed coating. Check N/A if pipeline was not exposed. “examine the exposed portion for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If you find external corrosion requiring corrective action under §195.585, you must investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion”
13. EXTERNAL PIPE CONDITION - Check the appropriate box to indicate the general condition of any bare pipe. Check N/A if coating was not removed or peeled.
14. COMMENTS – Include any explanation or other information deemed pertinent.
15. REPORT COMPLETED BY/DATE – Complete these blanks with the signature of the TAPC employee completing the form and date form was completed.
16. Make a simple sketch showing TAPC pipeline, the foreign structure, and the station number of the nearest upstream and downstream feature as indicated on the alignment sheet. Include a North arrow and any other features that may help locate the new pipeline. For this information, calculate the exact station number to the nearest foot of the crossing. Attach this sketch to the Form(s) TAPC 02 & 02a and distribute as indicated.

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