



U S Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

409 3rd Street, SW Suite 300
Washington, DC 20024

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 5, 2007

Mr Tim Gordon
Vice President
Gordon Terminals
P O Box 313
McKees Rocks, PA 15136

CPF 1-2007-6004M

Dear Mr Gordon

On September 11-12, 2007, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code inspected Gordon Terminal's procedures in McKees Rocks, Pennsylvania for integrity management of Gordon's Tioga Pipeline

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Gordon's plans or procedures, as described below

1. IM Plan Development in Framework Stage

§195.452(b) What program and practices must operators use to manage pipeline integrity? (5) Implement and follow the program;

§195.452(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience,

conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area.

A number of issues involved with the Integrity Plan are addressed in Gordon's OPA 90 and O&M Plans. The issues included in those plans should be referenced in the IM Plan where ever appropriate

Gordon conducts their patrol activities in accordance with 195 requirements and their O&M procedures outline the field process. This process needs to be expanded to explain what happens with field documents once they are received in the office for disposition

2. Risk Factors

§195. 452(f) An operator must include, at minimum, each of the following elements in its written integrity management program: (3) An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure

Gordon has provided well-summarized tables within their IM Plan. One of those tables shows risk factors where third party excavation damage needs to be included

Gordon provides in their IM Plan a "vulnerability analysis" for each pipeline section and the farm tanks. For clarification, these analyses should explicitly state in some fashion that they address the "risk analysis" requirements of the IM Rule

Within the P&M measures portion of the IM Plan, Gordon needs to state how these measures have impacted their risk factors

For the leak detection portion of their P&M measures, the "N/A" shown for the risk assessment results of the tank farm should be changed to reference the appropriate section in the IM Plan where the results are documented

3. Classification of Anomalies

§195. 452(h) What actions must an operator take to address integrity issues?

Gordon has assessed their pipeline using a successful pressure test where no anomalies were found. In the event future assessments result in needed repairs, more detail is needed within their plan outlining how these repairs would be prioritized

Response to this Notice

This Notice is provided pursuant to 49 U S C § 60108(a) and 49 C F R § 190 237 Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance 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) 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 a Final Order

If, after opportunity for a hearing, 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 C F R § 190 237) If you are not contesting this Notice, we propose that you submit your amended procedures to my office within one hundred twenty (120) 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

In correspondence concerning this matter, please refer to **CPF 1-2007-6004M** and, for each document you submit, please provide a copy in electronic format whenever possible

Sincerely,



For Byron E Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure *Response Options for Pipeline Operators in Compliance Proceedings*