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August 28, 2014

Ms. Linda Daugherty  
Director, Central Region  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Adm.  
90 I Locust Street, Suite 462  
Kansas City, Missouri 64106

**Re: CPF No. 3-2012-5029**

Dear Ms. Daugherty,

SLPCO is providing the following reflecting actions taken in response to CPF 3-2012-5029. Identified shortfalls in our Integrity Management Plan (IMP), SLPCO is updating and incorporating appropriate data from our Operation & Maintenance Manual (O&M) and Integrated Contingency Plans (ICP). Incorporated information will include pre-determined worst case spill release volumes, preventive and Mitigative measures, program assessment, and potential release consequences and protection of High Consequence Area. Additionally, numerous changes documented in plan to include clarifying procedures to measure program effectiveness.

1. *CO 1; With respect to the violation of §195.452(i)(2), (Item 1), Respondent must calculate release volumes for each operational scenario for each pipeline segment. Using the calculated worst case scenario for each segment, apply the over land spread, water transport, or combination to identify potentially affected HCAs. Then using this information, evaluate whether response procedures should be modified in order to mitigate potential consequences and document any newly identified potential HCAs.*

Item 1; Calculated worst case release by pipeline segments from our O&M and ICP was incorporated into our IM Plan. SLPCO requested assistance from our response organization (Geeding Construction, Inc.) for release volume verification for each pipeline segment scenario. With this groups assisted the release volume from pipeline segments under idled condition were considered. The elevation trajectory of each line segment, volume between isolation valves, elevation changes over levees, expected drain down from adjoining segments and the strategically located check valve at Columbia Bottoms Road preventing drain down from higher elevation back toward water crossings. Evaluation of pipeline hydraulic gradient reviewed with goal of verifying expected release volumes of the pipeline under operating and idled status.

2. *CO 2. With respect to the violation of §195.4520)(2) (Item 2), Respondent must perform evaluations to address threats on its pipeline and propose additional preventive and Mitigative measures.*

Item 2; SLPCO developed an "IMP Management Review-Evaluation Template to assist in documenting and performing periodic evaluation of the Integrity Management Program. In addition to hydrostatic testing, SLPCO established specific damage prevention, preventative and Mitigative measures, and corrosion control program measurements. To clarify additional assessment methods used in the process of assessing pipeline integrity, we are incorporating into our IMP.

3. *CO 3; With respect to the violation of § 195.452(j)(3) (Item 3), Respondent must develop procedures to assure that it does not exceed assessment intervals. Respondent must also develop procedures for notifying PHMSA prior to exceeding the maximum assessment intervals.*

Item 3; SLPCO's IMP has clarified its procedures establishing IM assessment intervals of 5-years. Corporate office has been made aware of the necessity of making funds available to schedule and complete IM assessments on schedule. Procedures include acceptable methods for notifying PHMSA in accordance with 195.452(m).

4. *CO 4; With respect to the violation of § 195.452(k) (Item 4), Respondent must develop procedures to measure program effectiveness. Once developed, SLPC must apply these metrics to determine if additional actions should be taken to ensure the integrity of the applicable pipeline segments.*

Item 4; SLPCO has developed procedures and evaluation template for measuring IM program effectiveness.

Please except our apology for the delay in providing this request to your office, unfortunately personal and corporate issues delayed the necessary attention required to complete required actions in a timely manner.

Thank you for your assistance. If you have any questions, please feel free to contact me at your convenience cell phone (813) 918-1851, email [rwood@tampapipeline.com](mailto:rwood@tampapipeline.com).

Sincerely,



Robert A. Wood  
Regional Manager  
St. Louis Pipeline Operating, LLC

Cc: Robert Rose, President