



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

DEC 31 2002

Mr. Kevin Brown
Senior Vice President - Operations
Sinclair Pipeline Company
P.O. Box 30825
Salt Lake City, UT 84130-0825

Re: CPF No. 5-2002-5010

Dear Mr. Brown:

Enclosed is the Order Directing Amendment issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It makes findings of inadequate procedures and requires that you amend your integrity management program procedures. When the terms of the Order are completed, as determined by the Director, Western Region, OPS, this enforcement action will be closed. Your receipt of the Order Directing Amendment constitutes service of that document under 49 C.F.R. § 190.5.

Sincerely,

Gwendolyn M. Hill
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

cc: Mark A. Petersen
Manager, Pipelines and Terminals
Sinclair Oil Corporation

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590

In the Matter of)
)
Sinclair Pipeline Company,)
)
Respondent.)
)

CPF No. 5-2002-5010

ORDER DIRECTING AMENDMENT

On March 12-13, 2002, pursuant to 49 U.S.C. § 60117, representatives of the Western and Southern Regions, Office of Pipeline Safety (OPS), inspected Sinclair Pipeline Company's (Respondent's) integrity management program at Respondent's facility in Lakewood, Colorado. As a result of the inspection, the Director, Western Region, OPS, issued to Respondent, by letter dated April 30, 2002, a Notice of Amendment (NOA). The NOA alleged inadequacies in Respondent's integrity management procedures and proposed to require amendment of these procedures to comply with the requirements of 49 C.F.R. § 195.452.

Respondent responded to the NOA by letter dated June 24, 2002 (Response). Respondent did not contest the NOA and did not request a hearing, consequently Respondent waived its right to one. Respondent also submitted amended integrity management procedures with its response letter. The Western Region reviewed the amended procedures. The revised procedures now contain a Section 206 entitled, "Technical Basis for Buffer Zone." However, Section 206 is summary in nature, consisting largely of three one-page drawings containing various unsupported assumptions concerning worst case discharge volumes, spread pool width, and spread pool depth. Respondent did not explain the basis for these values and did not demonstrate why they could be relied upon to ensure that all segments are properly identified, particularly segments in the vicinity of topological gradients, streams and waterways, and drinking water high consequence areas. Respondent must provide segment identification procedures which include detailed supporting justifications that provide a sound technical basis for the assumptions and formulas used in its spill trajectory modeling.

Accordingly, I find that Respondent's integrity management program procedures are inadequate to ensure safe operation of its pipeline system. Pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237, Respondent is ordered to make the following changes to its integrity management program procedures:

1. Amend its procedures to ensure that pipeline segments that intersect with drinking water high consequence areas are included in its spill modeling analysis and identified as segments that could affect a high consequence area.
2. Amend its procedures to provide adequate technical justification for determining the extent of the buffer zone used to identify pipeline segments that could affect high consequence areas by including a systematic, detailed, and technically sound land flow analysis incorporating factors, such as topological and hydraulic gradients, that could stretch the spill pool footprint beyond that associated with uniform distribution.
3. Amend its procedures to provide adequate technical justification for determining the extent of the buffer zone used to identify pipeline segments that could affect high consequence areas to account for the actual flow characteristics of minor streams and waterways that can transport releases of commodity to a high consequence area.
4. Amend its procedures to provide adequate technical justification for determining the volume of commodity that could be released from a pipeline leak or rupture in determining the extent of the buffer zone used to identify pipeline segments that could affect high consequence areas, such that the basis for determining the worst case release volume is explained and taken into account.
5. Amend its procedures to include an independent field validation and quality assurance review of the results of the segment identification process to ensure that all pipeline segments that could affect a high consequence area have been identified.
6. Submit the amended procedures within 30 days following receipt of this Order Directing Amendment. Submit all procedures and technical justifications demonstrating compliance with this Order to the Director, Western Region, Office of Pipeline Safety, Golden Hills Centre, Suite A-250, 12600 West Colfax Avenue, Lakewood, CO 80215-3736.

The Director, Western Region, OPS, may grant an extension of time to comply with any of the required items upon a request by the Respondent demonstrating good cause for an extension.

Failure to comply with this Order Directing Amendment may result in the assessment of civil penalties of up to \$25,000 per violation per day, or in the referral of the case for judicial enforcement. The terms and conditions of this Order are effective upon receipt.



Stacey Gerard
Associate Administrator
for Pipeline Safety

DEC 31 2002

Date Issued