

VIA EMAIL TO: john@omegapartnersllc.com, kmurphy@omegapartnersllc.com, and lwright@omegapartnersllc.com

Mr. John Niemi
Member and Compliance Manager
Omega Partners, LLC
16647 Chesterfield Grove Road, Suite 200
St. Louis, Missouri 63005

Re: CPF No. 5-2019-6003M

Dear Mr. Niemi:

Enclosed please find the Order Directing Amendment issued in the above-referenced case. It makes findings of inadequate procedures against your subsidiary, OP Reno, LLC, and requires certain amendments to assure safe operation. When the amendment of procedures has been completed, as determined by the Director, Western Region, this enforcement action will be closed. Service of the Order Directing Amendment by e-mail is effective upon the date of mailing as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Enclosures (Order Directing Amendment and Notice of Amendment)

cc: Mr. Dustin Hubbard, Director, Western Region, Office of Pipeline Safety, PHMSA
Mr. Kameron Murphy, General Counsel, OP Reno, LLC
Mr. Larry Wright, Manager – Terminal Operations, OP Reno, LLC

VIA EMAIL – CONFIRMATION OF RECEIPT REQUESTED

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590**

In the Matter of)	
)	
OP Reno, LLC,)	CPF No. 5-2019-6003M
a subsidiary of Omega Partners, LLC,)	
)	
Respondent.)	
)	

ORDER DIRECTING AMENDMENT

On September 18, 2019, pursuant to 49 C.F.R. § 190.206, the Director, Western Region, Office of Pipeline Safety (OPS), issued a Notice of Amendment (Notice) to OP Reno, LLC (Respondent).¹ The Notice proposed finding that Respondent’s written procedures were inadequate to assure safe operation of a pipeline facility and proposed certain amendments to address the inadequacies. Respondent did not contest the allegations or proposed amendments.

Based upon a review of all of the evidence, pursuant to § 190.206, I find Respondent’s procedures were inadequate with respect to the issues listed below, as more fully described in the enclosed Notice, which is incorporated by reference:

49 C.F.R. § 195.402(c)(3) (**Item 1**) — Respondent’s operations and maintenance manual contains incomplete procedures for operating, maintaining and repairing the pipeline system in accordance with each of the requirements of Subpart F.

49 C.F.R. § 195.403(a)(1) (**Item 2**) — Respondent’s Terminal Emergency Response Plan, Section 6.4, relies on other sections of the plan without directing the reader to those sections.

49 C.F.R. § 195.403(b) (**Item 3**) — Respondent’s Terminal Emergency Response Plan, Section 6.4, states in part that appropriate training shall be conducted for each employee on an annual basis. In contrast, § 195.403(b) requires training at intervals not exceeding 15 months, but at least once each calendar year.

¹ OP Reno, LLC, is a subsidiary of Omega Partners, LLC. Omega Partners, LLC, website, available at <https://omegapartnersllc.com/> (last accessed March 10, 2020); Omega Partners III filing with Missouri Secretary of State, available at <https://bsd.sos.mo.gov/Common/CorrespondenceItemViewHandler.ashx?IsTIFF=true&filedDocumentid=4611165&version=1> (April 15, 2019).

Pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206, Respondent is ordered to take the actions proposed in the enclosed Notice to correct the inadequacies. The Director may grant an extension of time to comply with any of the required items upon a written request timely submitted by the Respondent and demonstrating good cause for an extension. Upon completion of ordered actions, Respondent may request that the Director close the case. Failure to comply with this Order may result in the assessment of civil penalties under 49 C.F.R. § 190.223 or in referral to the Attorney General for appropriate relief in a district court of the United States.

The terms and conditions of this order are effective upon service in accordance with 49 C.F.R. § 190.5.

April 6, 2020

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Date Issued