



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

901 Locust Street, Suite 480
Kansas City, MO 64106

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: craig.hoeferlin@spireenergy.com;
Bob.Gardner@spireenergy.com

December 14, 2022

Mr. Craig Hoeferlin
Vice President, Operations Services and SMS
Spire Missouri Inc. East
700 Market Street
St. Louis, Missouri 63101

CPF 3-2022-068 NOA

Dear Mr. Hoeferlin:

From March 15, 2022 through March 17, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, performed a specialized inspection of Spire Missouri, Inc. East's (Spire) Highly Volatile Liquid (HVL) pipeline system which contains propane and butane and is located in St. Louis, Missouri.

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

1. **§ 195.505 Qualification Program**
Each operator shall have and follow a written qualification program. The program shall include provisions to:
 - (a) . . .
 - (b) **Ensure through qualification that individuals performing covered tasks are qualified.**

Spire's OQ program is inadequate because it does not ensure through qualification that individuals performing covered tasks are qualified.

Specifically, the evaluation methods do not provide adequate information (e.g., O&M procedure requirements, list of questions or specific step/procedure, checklist of items, identification of equipment used) for evaluators to use to objectively verify knowledge, skills, and abilities during performance evaluations. During the inspection, PHMSA reviewed evaluators' checklists for several covered tasks and it was noted that they did not provide

adequate information. The evaluators' checklist included generic language and did not specify steps and/or procedures on how to perform the covered tasks.

The evaluators' checklist should be revised to include specific steps and/or procedures to properly evaluate an individual.

2. § 195.505 Qualification Program

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) . . .

(h) After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities;

Spire's OQ program is inadequate because it did not include procedures for appropriate training to ensure individuals performing covered tasks have the necessary knowledge and skills to perform tasks in a manner that ensures the safe operation of pipeline facilities. Specifically, Spire's training program (Lesson Plan for NGL Training) did not contain sufficient detail in knowledge and skills needed for safe operation because the procedures contained only an overview of propane characteristics, ignition sources and threats to the system.

Additionally, Spire's OQ plan lacked a process for adequate documentation of training. The plan states that training will be provided, but it lacked a defined process for documenting the training performed for the covered tasks. Specifically, Spire's OQ plan did not require adequate documentation for personnel trained to react to Abnormal Operating Conditions (AOC) to safely startup, shutdown, operate, and monitor the HVL pipeline.

The Spire OQ plan must therefore be revised to include detailed training that includes the knowledge and skills for safe operation, including detailed documentation of the results of training as applicable to each task. The procedures must also be revised to include adequate documentation requirements showing that personnel are able to properly recognize AOCs on the pipeline prior to startup, during operation, and when shut-in based on operational data such as pressure, flow rates, and volume changes.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 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.

It is requested that Spire maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory A. Ochs, Director, Central, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2022-068 NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central
Pipeline and Hazardous Materials Safety Administration

cc: Craig Hoeflerlin, VP, Operations Services and SMS, (craig.hoeflerlin@spireenergy.com)

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings