

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED COMPLIANCE ORDER**

VIA ELECTRONIC MAIL TO: tampapc@outlook.com; stlouispipelinegm@outlook.com;
Edric.kidd@panamericanpipelines.com

December 19, 2024

Robert Rose
President
St Louis Pipeline Operating, LLC
4120 Higel Street
Sarasota, FL 34242

CPF 3-2024-001-NOPV

Dear Mr. Rose:

From May 20, 2024 through October 18, 2024, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) performed an on-site inspection of St Louis Pipeline Operating, LLC's (SLPCO) refined petroleum pipeline system, in Madison County, Illinois and St Louis County, Missouri.

As a result of the inspection, it is alleged that SLPCO has committed a probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. § 195.420 Valve maintenance.

(a) Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times.

SLPCO failed to maintain pipeline valves necessary for the safe operation of its pipeline system in good working condition, as required by § 195.420(a). During PHMSA's inspection, PHMSA reviewed SLPCO's valve mainline inspection Form 08 reports for calendar years 2021, 2022, and 2023. The valve inspections included Valve 6, where records from 2022 indicated "valve #6 is hard to turn, had to get started with pipe wrench." Per SLPCO's records, Valve 6 still had this issue in 2023. SLPCO did not have any documentation to demonstrate that Valve 6 was subsequently repaired to ensure it was in good working order at all times. During the PHMSA

inspection of SLPCO's headquarters in May 2024, SLPCO staff informed PHMSA that Valve 6 had yet to be repaired. Thus, SLPCO failed to maintain Valve 6 in good working condition, as required by § 195.420(a).

Proposed Compliance Order

With respect to Item 1, pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to St Louis Pipeline Operating LLC. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

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. All material you submit in response to this enforcement action may be 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 your receipt of this Notice, you have 30 days to respond as described in the enclosed *Response Options*. 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 you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. The Region Director may extend the period for responding upon a written request timely submitted demonstrating good cause for an extension.

In your correspondence on this matter, please refer to **CPF 3-2024-001-NOPV** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Barry Croft, Facility Supervisor, St Louis Pipeline Operating LLC,
stlouispipelinegm@outlook.com
Edric Kidd, National Pipeline Manager, St Louis Pipeline Operating LLC,
Edric.kidd@panamericanpipelines.com

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Enforcement Proceedings

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to SLPCO a Compliance Order incorporating the following remedial requirements to ensure the compliance of SLPCO with the pipeline safety regulations:

- A. In regard to Item 1 of the Notice, pertaining to SLPCO's failure to have each valve necessary for the safe operation of the pipeline system in good working condition at all times, SLPCO must submit to the Director, Central Region, a plan to remediate Valve 6 within **30** days of receipt of the Final Order, for the Director's review and approval. Furthermore, SLPCO must submit records to demonstrate the implementation and completion of the remedial work plan within **60** days of the Director's approval of the remedial work plan.
- B. It is requested (not mandated) that SLPCO maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Gregory A. Ochs, Director, Central, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: (1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and (2) total cost associated with replacements, additions and other changes to pipeline infrastructure.