WARNING LETTER

VIA ELECTRONIC MAIL TO: tampapc@outlook.com; stlouispipelinegm@outlook.com; greg.lipscomb@panamericanpipelines.com; berry.croft@panamericanpipelines.com

October 29, 2025

Mr. Robert Rose
President and CEO
St. Louis Pipeline Operating, LLC
P.O. Box 35236
Sarasota, FL 34242

CPF 3-2025-011-WL

Dear Mr. Rose:

From August 19 to August 28, 2024, a representative 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.), conducted an inspection of the Control Room Management (CRM) procedures and records of St. Louis Pipeline Operating, LLC (SLPLO) in Hartford, Illinois.

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

1. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

SLPLO failed to provide records to demonstrate it performed an annual review of its procedures, as required by §§ 195.446(a) and 195.402(a).[1] Page two of the SLPLO O&M Plan had a list of revisions – change numbers, the associated date of the change, and an identifier used in the body of the O&M Plan to locate the change. If one were to use the list of changes on page two of the O&M Plan as a record the plan was reviewed, there were several gaps between years where no changes or reviews were completed. In addition, there was no signature on the plan to verify it was reviewed and accepted.

2. § 195.444 Leak Detection

> **(a) *Scope*. Except for offshore gathering and regulated rural gathering pipelines, this section applies to all hazardous liquid pipelines transporting liquid in single phase (without gas in the liquid).**
> **(b) *General*. A pipeline must have an effective system for detecting leaks in accordance with §§ 195.134 or 195.452, as appropriate. An operator must evaluate the capability of its leak detection system to protect the public, property, and the environment and modify it as necessary to do so. At a minimum, an operator's evaluation must consider the following factors—length and size of the pipeline, type of product carried, the swiftness of leak detection, location of nearest response personnel, and leak history.**

SLPLO failed to evaluate the capability of its leak detection system to determine if its system was effective for detecting leaks in accordance with § 195.134 or § 195.452, as required by § 195.444(b). The pipeline system crosses commercially navigable waterways and supplies a metropolitan airport. The pipeline was in a high consequence area and necessitated an effective leak detection system for detecting leaks in accordance with §§ 195.452(i)(3) and 195.444(b). SLPLO did not provide leak detection capability evaluations for PHMSA's review and therefore was unable to demonstrate compliance with § 195.444(b).

3. § 195.446 Control room management.

> **(a) *General*. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**
> **(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions.**

SLPLO failed to define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions, as required by § 195.446(b). Specifically, SLPLO's CRM Plan did not accurately represent SLPLO's actual operating practice, and did not provide a clear process to describe the conditions when the physical domain of responsibility periodically changes in the control room.

[1] Section 195.446(a) requires integration of the control room management procedures into the written procedures required by § 195.402(a).

The CRM Plan stated the controller is normally the only personnel in the control room during nights, weekends, and holidays, but in practice the standard control room operations occurred weekdays during the daytime. At night, the controller left the control room and turned off the SCADA system. When the power was off, SCADA did not perform any operational monitoring of assets, including the monitoring of HCAs (e.g., the commercially navigable river crossings), and no operational information was archived. As a result, no alarms or alerts were received or dispatched. There was no procedure in the CRM Plan for shutting down the SCADA system at the end of the day or starting up the system at the beginning of the day. SLPLO used check lists for standard operating procedures, but there were no checklists for shutdown and startup of the SCADA systems.

In addition, at the time of PHMSA's inspection SLPLO had one trained and qualified controller. The controller had a designated cell phone, which the controller took home in case there was need to respond to after-hours calls from the public. There were no procedures related to the controller's roles and responsibilities for after-hour response or for the on-call practice of the controller.

Furthermore, at the time of PHMSA's inspection, the controller also had non-control room duties, including climbing two tanks to take product inventory, and periodic walking around the yard to make observations of conditions. At any time, the controller could fall or suffer other personal injury rendering them incapacitated and not be able to communicate, yet there were no procedures in place to cover this possibility. Detailed procedures to follow in such an event would be critical for the safe operation of the pipeline.

4. § 195.446 Control room management.

> **(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**
> **(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**
> **(1) . . . .**
> **(2) A controller's role when an abnormal operating condition is detected, even if the controller is not the first to detect the condition, including the controller's responsibility to take specific actions and to communicate with others.**

SLPLO's operating procedures, including the CRM Plan, were not adequate to define the controllers' authority and responsibilities when an abnormal operating is detected, as required by § 195.446(b)(2). While procedures were in place for controllers in the CRM Plan, the SLPLO Operations and Maintenance Procedural Manual (O&M Manual), the SLPLO Emergency Response Manual, and the Operating Checklists, the procedures were not consistent in their directions to controllers and references therein were not correct. Examples included notes to use the Emergency Stop Switch in one procedure that was not in another, instructions to close a valve in one procedure that was not included in the other, one plan directing following the integrated contingency plan while the other procedure did not mention this, the name of the delivery customer

being different between procedures, and having different identification numbers for the valve on Banshee Road that required being closed.

The procedures addressing controller responsibility to take specific action and communicate with others when an abnormal operating condition or emergency is identified were inconsistent. The O&M Manual provided specific steps for control center employees to take if abnormal operations are identified, followed by even more specific instructions for controller response for defined abnormal operation events. However, the CRM Plan addressing controller roles and responsibilities for Emergency/Abnormal Operation Conditions were high level statements related to recognizing, reacting, and investigating. In another example, the CRM Plan stated that continued operations or restart of the pipeline following shutdown depended upon conditions – but these conditions were not articulated. The CRM procedure must address these issues to ensure the controllers' roles and responsibilities are clearly tied to the expectations in the O&M Manual.

5. § 195.446 Control room management.

> **(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**
> **(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**
> **(1) . . . .**
> **(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others.**

SLPLO's procedures did not define a controller's role during an emergency, as required by § 195.446(b)(3). Specifically, they did not define the controller's role in the event the control room needs to be evacuated. Emergency Manual Appendix P, Tornado Emergency, provided guidance on sheltering and, if time allows, initiating an emergency shut down of the pipeline. The procedure, however, did not address shutting down the SCADA system and SLPLO had no procedure or checklist that covered the control room evacuation practice at the time of PHMSA's inspection. SLPLO's plans and procedures should have provided detailed steps for controllers to follow during an emergency in the event the control room needs to be evacuated, their roles and responsibilities in the event the control room must be evacuated, and the shutdown requirements for the pipeline and SCADA system for emergencies that were reasonably likely to occur.

6. § 195.446 Control room management.

> **(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**

(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following.
(1) . . . .
(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others.

SLPLO's CRM Plan did not define the controller's role during an emergency, as required by § 195.446(b)(3). Specifically, it did not define the controller's role in the event the SCADA system or data communications system fails, constituting an emergency that could impact large sections of the controller's domain of responsibility. SLPLO addressed loss of communications in its O&M Manual. It considered loss of communications as an abnormal operating procedure but not one that would affect the safe operation of the pipeline system. However, loss of any one communications system would impact safe operations. The pipeline is in a high consequence area and SLPLO depended upon communications to report and compare meter readings between the two ends of the pipeline for leak detection. If one communication system failed, the leak detection method SLPLO employed would not function. The O&M Manual provided directions to take in the event communication was not restored after some reasonable length of time. This included steps to restore communications. It indicated that if there is a total system or data failure or if the situation is deemed critical, the system will be shut down until re-establishment of communications. However, there was no established time to wait before shutting down the system. The decision was left to the discretion of the individual controller. The O&M Manual provided no criteria to guide the controller's decision-making. SLPLO's procedures should have considered the severity of the communication loss, the appropriate wait times before a controller needs to act, to include acting to shut down the pipeline, and points of contact depending upon the severity of the communication loss.

In addition, the CRM Plan itself did not address loss of communications, and it did not reference specific O&M Manual sections. The regulation requires the control room management procedures to have this information.

7. § 195.446 Control room management.

(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….
(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:
(1) . . . .
(5) The roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers.

SLPLO failed to have a procedure that addressed the roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers, as required by § 195.446(b)(5). PHMSA requested all procedures related to implementation of § 195.446 control room management. The procedures were provided and reviewed, and the SLPLO failed to have a procedure to demonstrate compliance.

8. § 195.446 Control room management.

> **(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**
> **(b) . . . .**
> **(c) *Provide adequate information.* Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:**
> **(1) . . . .**
> **(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months.**

SLPLO failed to have an internal communication plan to provide adequate means for manual operation of the pipeline safely, as required by § 195.446(c)(3). This was due to SLPLO's policy in Appendix 12, sub-section 18, that stated it does not need to have an internal communications plan due to its practice to not operate its system manually. However, if the pipeline is shut down to a no flow condition, the pipeline is still in operating mode. Monitoring for leaks or normal, abnormal, or emergency conditions is still required, even if not flowing product. SLPLO did not have an internal communication plan to provide adequate means for safe manual operation when the pipeline is not flowing product but still in operating mode.

9. § 195.446 Control room management.

> **(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**
> **(b) . . . .**
> ***(d) Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined.**
> **(1) Establish shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep;**

SLPLO's CRM Plan failed to implement the methods prescribed by § 195.446(d) to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined. Specifically, the CRM Plan failed to establish shift

lengths and schedule rotations that address when an on-call controller must respond to after-hours pipeline events. SLPLO's sole controller at the time of inspection was assigned to after-hours pipeline response. This individual took home a company cell phone and responded to after-hours emergency calls. Section 12.1 provided a table that illustrated shift schedule, but the table did not address the single controller on duty, nor the Monday – Friday shift schedule practiced. There were no procedures in place to address this situation to ensure the controller's sleep was not interrupted, nor did the procedures address how, when only one controller is on staff, the controller will be afforded appropriate rest or assigned additional fatigue mitigating techniques.

10. § 195.446 Control room management.

> **(a) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**
> **(b) . . . .**
> **(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:**

SLPLO CRM Plan section 13 failed to demonstrate compliance because it did not provide a written alarm management plan to provide for effective controller response to alarms, as required by § 195.446(e). Specifically, the procedure laid out concepts and philosophy for alarm management, but it did not provide details of how alarms were to be designed, implemented, and maintained.

The CRM Plan did not have a process for documenting and rationalizing alarms, to include alarm prioritization, establishing alarm set points and descriptions, how alarm priorities were displayed to the controller and describing any differences between the two SCADA systems. It did not have a process to identify inaccurate, malfunctioning or false alarms, and document and track them to correction. While it identified safety related alarms, it did not define how they were implemented in the SCADA system, displayed to the controller, or the difference defined between the two SCADA systems. SLPLO operated two different SCADA systems, identified as HINZ and EPIC, which were designed and integrated at different times by totally different contractors. There was no SCADA style guide, and from PHMSA's observations the screens were quite different, as were the alarms. SLPLO had no documentation to support the SCADA alarm design or operation. In addition, during review of the SCADA system, PHMSA inspectors spoke with the sole controller. The controller was not aware of what safety related alarms were or the priority of alarms between the two systems. The CRM Plan did not provide enough detail to demonstrate SLPLO had adequate processes to ensure SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations, as required by § 195.446(e)(1).

SLPLO CRM Plan section 13.3 also failed to provide a process for how the operator would identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities, as required by § 195.446(e)(2). CRM Plan section 13.3 paraphrased the regulation and offered no detail on how to conduct monthly alarm reviews. The CRM Plan offered two forms to

document the reviews: 12e CRM - Disabled Safety Related Log and 12f CRM - Forced Point Log. These forms were not referenced in the procedure, and there was no form to cover the requirements for points off scan. In addition, the two forms appeared to be redundant except the CRM - Disabled Safety-Related Alarm Log included a category for false alarms. There was no definition or instruction on how to identify and document false alarms in either the procedure or the form. There was no process addressing how to evaluate corresponding equipment, maintenance, or repair activities to related points affecting safety taken off-scan, inhibited, and or that have had forced or manual valves to determine whether those periods of time exceeded that required for maintenance or operating activities.

SLPLO CRM Plan sections 13.4(h) and 13.4(i) did not provide a process to verify the correct safety-related alarm set-point values and alarm descriptions when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months, as required by § 195.446(e)(3). Both sections 13.4(h) and 13.4(i) only provided a statement of the activity without any details on the process, to include who is responsible, how the verification will be completed, and how the activity will be documented. CRM Plan section 18.3 simply restated the language of 49 CFR § 195.446(e)(3) with no additional details or process. SLPLO checklists M-5, M-6 and M-7, related to equipment calibrations, did not require field personnel to verify alarm setpoints or alarm descriptions with the control room. The controller did verify the alarms presented by lowering the alarm set point until an alarm sounded. Checklist M-5 did not verify an alarm set point, but rather verified that an alarm will present itself. In addition, the M-5 checklist step conflicted with CRM Plan section 13.5, which stated that controllers are not authorized to disable, override, or change safety-related alarm settings.

SLPLO CRM Plan section 18.4 did not support a thorough monitoring and analyzing of the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months, which will assure controllers have sufficient time to analyze and react to incoming alarms general activity directed to the controller, as required by § 195.446(e)(5). The procedure indicated a job task analysis form would be used to analyze the controllers task load. Form 12h was developed in an Excel spread sheet and used for the evaluation. The form provided adequate details to consider all the tasks of the controller; however, SLPLO's procedure did not reference the form. The procedure provided considerations and a philosophy on what should be included in the review, but provided no task specifics nor did it detail how to conduct the assessment. In addition, the procedure provided metrics related to alarms per hour, per day as "the maximum manageable number of alarms." Form 12h documented time the controller spent on activities. But the form did not incorporate the stated metrics from the procedure, and it did not provide metrics related to the data collected to determine if the controller had sufficient time to respond to alarms.

Furthermore, SLPLO CRM Plan section 13.5 did not provide details on how to address deficiencies identified through implementation of § 195.4465(e)(1)-(e)(5), as required by § 195.446(e)(6). In addition, other inadequacies were present in CRM Plan section 13.3. Section 13.3stated, "[a]ppropriate corrective action is required to return alarm points to service in an expedited manner," but offered no further details. Section 13.5, stated, "[p]romptly address all deficiencies identified in the SCADA reviews," but did not define a process to address the deficiencies.

11. § 195.446 Control room management.

(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….
(b) ….
(f) *Change management.* Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:
(1) Implement section 7 of API RP 1168 (incorporated by reference, see § 195.3) for control room management change and require coordination between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration.

SLPLO failed to assure that changes that could affect control room operations are coordinated with the control room personnel, as required by § 195.446(f). Specifically, SLPLO did not follow its procedure, O&M Plan Appendix 12, sub-section 14.7, to document and maintain records for the changes related to the SLPLO pipeline relocation as well as for the SCADA and station modifications for the Lambert Field project. Per its procedure, and as required by section 7 of API RP 1168, this change required SLPLO to conduct a point-to-point verification following the relocation of the tank, pipeline, and SCADA points at Lambert Field in July 2021, as required by O&M Plan Appendix 12, sub-section 14.6.The procedure also required records be retained to demonstrate training and communication of the physical control room changes and SCADA changes to the control room personnel. PHMSA requested records of the point-to-point verification and records of the training and communication related to the physical control room changes and SCADA changes on August 30, 2024.[2] SLPLO did not provide the records for review.[3] A request for the Management of Change (MOC) as well as any controller communication and training records related to the pipeline, facility and SCADA changes were made on August 30 and October 16, 2024.[4] SLPLO did not provide records for review. Therefore, SLPLO did not demonstrate compliance.

12. § 195.446 Control room management.

(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….
(b) . . . .

[2] PHMSA requested these records on August 30, 2024, Requested Item #5.
[3] Records were required to be maintained pursuant to 49 CFR § 195.446(j)(1).
[4] Requested items submitted to the operator on August 30, 2024, Requested Item #9 and Request for Specific Information #5 on October 16, 2024.

(f) Change management. **Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:**
(1) **. . . .**
(2) **Require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations.**

The checklists that SLPLO used to effectuate section 14 of its CRM Plan failed to require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations, as required by § 195.446(f)(2). Section 14 of the CRM Plan required field personnel to notify the control room when emergency conditions exist and when making field changes that affect control room operations. However, Checklist M and O series, which provide detailed steps used for testing, calibration, operations, and maintenance activities of field equipment, did not require field personnel to notify the control room before beginning work or in the event of an emergency. In addition, O&M Manual section 6.2, entitled Receiving, Identifying, Classifying and Notifying of Emergencies, did not require field personnel to notify the control room or reference CRM Plan section 14.

13. § 195.446 Control room management.

(a) ***General.*** **This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….**
(b) . . . .
(g) Operating experience. **Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:**
(1) **Review accidents that must be reported pursuant to §§ 195.50 and 195.52 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to:**

(i) Controller fatigue;
(ii) Field equipment;
(iii) The operation of any relief device;
(iv) Procedures;
(v) SCADA system configuration; and
(vi) SCADA system performance.

SLPLO's O&M Manual section 6.7 and its CRM Plan sections 15.1 and 15.2 failed to provide details on how accidents reported pursuant to §§ 195.50 and 195.52 should be reviewed to determine if control room actions contributed to the event and, if so, how to correct them, as required by § 195.446(g)(1). Specifically, the procedures paraphrased the regulation and did not provide details for how an assessment would be made to determine if control room actions contributed to the event.

14. § 195.446 Control room management.

(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section….
(b) . . . .
(h) *Training.* Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:
(1) Responding to abnormal operating conditions likely to occur simultaneously or in sequence;
(2) . . . .
(5) For pipeline operating setups that are periodically, but infrequently used, providing an opportunity for controllers to review relevant procedures in advance of their application; and
(6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph no later than January 23, 2018.

SLPLO failed to establish a controller training program to provide for training each controller to carry out the roles and responsibilities defined by the operator, as required by § 195.446(h). Specifically, SLPLO did not have a controller training program to provide for: (1) responding to abnormal operating conditions likely to occur simultaneously or in sequence, required by § 195.446(h)(1); (2) pipeline operating setups that are periodically, but infrequently used, providing an opportunity for controllers to review relevant procedures in advance of their application, required by § 195.446(h)(5); and (3) control room team training and exercises that included both controllers and other individuals who would be reasonably expected to operationally collaborate with controllers during normal, abnormal, or emergency situations, required by § 195.446(h)(6). PHMSA reviewed SLPLO's training checklist and found them to lack content for the aforementioned elements. In addition, the procedure did not include the requirement for control room team training and exercises that included both controllers and other individuals, and no content was developed. O&M Plan Appendix 12, sections 16.0 through 16.8 provided a narrative on what would be included in SLPLO's training program, but there was no content attached other than the three identified Energy World Net (EWN) Computer Based Training (CBT). There was no training program with established content, training time frames, or assessments or evaluations. PHMSA requested SLPLO's training records. The documents provided in response included tabletop drills, EWN records, and Part 195 procedure and checklist reviews. Much of the training content related to the field or terminal activities. This does not constitute a controller training program. Therefore, SLPLO failed to comply with § 195.446(h).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed $272,926 per violation per day the violation persists, up to a maximum of $2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024 the maximum penalty may not exceed $266,015 per violation per day the violation persists, up to a maximum of $2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023 the maximum penalty may not exceed $257,664 per violation per day the violation persists, up to a maximum of $2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023 the maximum penalty may not exceed $239,142 per violation per day the violation persists, up to a maximum of $2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022 the maximum penalty may not exceed $225,134 per violation per day the violation persists, up to a maximum of $2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021 the maximum penalty may not exceed $222,504 per violation per day the violation persists, up to a maximum of $2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021 the maximum penalty may not exceed $218,647 per violation per day the violation persists, up to a maximum of $2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in St. Louis Pipeline Operating, LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2025-011-WL**. 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).

Sincerely,

David Barrett
Acting Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Greg Lipscomb, General Manager, Tampa Bay Pipeline Corp.,
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RECEIPT CONFIRMATION REQUESTED