



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

901 Locust Street, Suite 480
Kansas City, MO 64106

NOTICE OF AMENDMENT

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

May 29, 2025

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

CPF 3-2025-020-NOA

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.), inspected St. Louis Pipeline Operating, LLC's (SLPCO) procedures for operations, maintenance, and integrity management in Madison County, Illinois, and St. Louis County, Missouri.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within SLPCO's plans or procedures. The items inspected and the alleged inadequacies and proposed revisions are described below.

1. § 195.254 Above ground components.

(a)

(b) Each component covered by this section must be protected from the forces exerted by the anticipated loads.

Section 195.422(b) of Subpart F prohibits use of any pipe, valve, or fitting, for replacement in repairing pipeline facilities, unless designed and constructed per Part 195. Section 195.254(b) of Subpart D, Construction, states, "[e]ach component covered by this section must be protected from the forces exerted by the anticipated loads." Per § 195.402(c), an operator's manual for maintenance and normal operations must include procedures for operating, maintaining, and

repairing the pipeline system in accordance with Subpart F, among other provisions. SLPCO's Operations and Maintenance Procedure Manual, section 4.17, "New Pipeline Construction," failed to include or reference how components, installed above ground in the situations described in § 195.254(a),¹ would be protected from the forces exerted by anticipated loads on above-ground components, per the requirements of § 195.254(b). To ensure that components used in new, replaced or otherwise changed portions of the St. Louis Pipeline are protected from the forces exerted by the anticipated loads, SLPCO must revise its written procedures for design and construction to address § 195.254(b).

2. § 195.260 Valves: Location

A valve must be installed at each of the following locations:

- (a) On the suction end and the discharge end of a pump station in a manner that permits isolation of the pump station equipment in the event of an emergency.**
- (b) On each pipeline entering or leaving a breakout storage tank area in a manner that permits isolation of the tank from other facilities.**
- (c) On each pipeline at locations along the pipeline system that will minimize or prevent safety risks, property damage, or environmental harm from accidental hazardous liquid or carbon dioxide discharges, as appropriate for onshore areas, offshore areas, and high-consequence areas (HCA). For newly constructed or entirely replaced onshore hazardous liquid or carbon dioxide pipeline segments, as that term is defined at § 195.2, that are installed after April 10, 2023.**
- (d)**
- (f) On each side of a reservoir holding water for human consumption.**

Pursuant to § 195.202, "[e]ach pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part." SLPCO's Operations and Maintenance Procedure Manual, section 4.17, "New Pipeline Construction," did not adequately describe where valves would be required consistent with § 195.260. Section 195.260's requirements became effective October 5, 2022,² and should have been addressed in SLPCO's manual(s) at the time of PHMSA's 2024 inspection. Therefore, SLPCO must amend its procedures to adequately address the requirements of § 195.260.

3. § 195.406 Maximum operating pressure.

- (a) Except for surge pressures and other variations from normal operations, no operator may operate a pipeline at a pressure that exceeds any of the following:**
 - (1) The internal design pressure of the pipe determined in accordance with § 195.106....³**

¹ i.e., (1) overhead crossings of highways, railroads, or a body of water; (2) spans over ditches and gullies; (3) scraper traps or block valves; (4) areas under the direct control of the operator; and (5) in any area inaccessible to the public.

² Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards, 87 Fed. Reg. 20940 (April 8, 2022).

³ § 195.406(a)(1) contains an exception to the requirement for steel pipe in pipelines being converted under § 195.5,

- (2) The design pressure of any other component of the pipeline.**
- (3) Eighty percent of the test pressure for any part of the pipeline which has been pressure tested under subpart E of this part.**
- (4) Eighty percent of the factory test pressure or of the prototype test pressure for any individually installed component which is excepted from testing under § 195.305.**
- (5) For pipelines under §§ 195.302(b)(1) and (b)(2)(i) that have not been pressure tested under subpart E of this part, 80 percent of the pressure or highest operating pressure to which the pipeline was subjected for 4 or more continuous hours that can be demonstrated by recording charts or logs made at the time the test or operations were conducted.**

Pursuant to § 195.402(c)(3), an operator's manual for maintenance and normal operations must have procedures for operating, maintaining, and repairing the pipeline system in accordance with Subpart F, among other provisions. Section 195.406 is found within Subpart F. SLPCO's Operations and Maintenance Procedure Manual, section 4.24, "Establishing Maximum Operating Pressures (MOP)," failed to include all factors in § 195.406(a). Specifically, the procedure manual did not include the requirement that the established MOP may not exceed any of the five factors under § 195.406(a). Therefore, SLPCO must amend its procedures related to § 195.406 for maximum operating pressure.

4. § 195.418 Valves: Onshore valve shut-off for rupture mitigation.

(a) *Applicability.* For newly constructed and entirely replaced onshore hazardous liquid or carbon dioxide pipeline segments, as defined at § 195.2, with diameters of 6 inches or greater that could affect high-consequence areas or are located in high consequence areas (HCA), and that have been installed after April 10, 2023, an operator must install or use existing rupture-mitigation valves (RMV), as defined at § 195.2, or alternative equivalent technologies according to the requirements of this section and § 195.419. RMVs and alternative equivalent technologies must be operational within 14 days of placing the new or replaced pipeline segment in service. An operator may request an extension of this 14-day operation requirement if it can demonstrate to PHMSA, in accordance with the notification procedures in § 195.18, that application of that requirement would be economically, technically, or operationally infeasible. The requirements of this section apply to all applicable pipe replacements, even those that do not otherwise directly involve the addition or replacement of a valve.

Per § 195.402(c)(3), an operator's manual for maintenance and normal operations must include procedures for operating, maintaining, and repairing the pipeline system in accordance with Subpart F, among other provisions. Section 195.418 is a part of Subpart F. SLPCO's Operations and Maintenance Procedure Manual, section 4.17, "New Pipeline Construction," failed to include or reference other SLPCO documents for the installation of rupture mitigation valves (RMV) or alternative equivalent technology, pursuant to § 195.418. The procedural manual also did not address the capabilities of RMVs, and alternative equivalent technology as described by

which is not applicable for SLPCO's pipeline system.

§ 195.419 (cross-referenced with § 195.418). Requirements for RMVs and alternative equivalent technology became effective October 5, 2022⁴ and should have been addressed in SLPCO's manual(s) at the time of PHMSA's 2024 inspection. Therefore, SLPCO must amend its procedures to adequately address the requirements of § 195.418.

5. § 195.422 Pipeline repairs.

(a) Each operator shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.

Pursuant to § 195.402(c)(3), an operator's manual for maintenance and normal operations must have procedures for operating, maintaining, and repairing the pipeline system in accordance with Subpart F, among other provisions. Section 195.422 is found within Subpart F. SLPCO's Operations and Maintenance Procedure Manual, section 4.12, "Pipeline Repair," addressed how SPLCO would make repairs in a safe manner to prevent damage to persons and property. Within the procedure manual, SPLCO did not describe the precautions that it would need to take in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, which is specifically required by § 192.402 to ensure safe maintenance and normal operations. *See* § 195.402(c)(14)). In addition, section 8.2.2 of the SPLCO's Integrity Management Plan listed safety precautions required during pressure testing, however, it did not cover repairs that would involve cutting or welding where measures would be needed to prevent fires or explosions. Therefore, SLPCO must amend its procedures to address how repairs are to be made in a safe manner so as to prevent damage to persons or property in excavated trenches and during cutting or welding.

6. § 195.452 Pipeline integrity management in high consequence areas.

(a)

(f) *What are the elements of an integrity management program?* An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

(1)

(3) An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure (see paragraph (g) of this section);

SLPCO's "Pipeline Integrity Management Plan" (IMP) for risk and information analysis did not include an analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure, as required by § 195.452(f)(3). The IMP, section 6, "Risk Analysis" and the "Risk Index (Appendix B)," did not include every attribute described in

⁴ Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards, 87 Fed. Reg. 20940 (April 8, 2022).

§ 195.452(g). Specifically, they did not include § 195.452(g)(1)(iii) and §§ 195.452 (g)(1)(v) through (g)(1)(xxi). While the IMP Glossary for “Discovery of Condition” mentioned integrating additional information from other inspections, it did not specifically include what data elements would be integrated. Also, SLPCO’s IMP did not specify how spatial relationships among anomalous information would be identified, pursuant to § 195.452(g)(4). In addition, Section 6.5 of SLPCO’s IMP referred to the initial risk index in Appendix B, but it did not appear to be changed to reflect operating experience, as required by § 195.452(f). All attributes listed in § 195.452(g) required to be included in the written integrity management program pursuant to § 195.452(f)(3) were to be integrated by October 1, 2022, and should have been included in SLPCO’s IMP at the time of PHMSA’s 2024 inspection. Therefore, SLPCO must amend its procedures related to integrating all available information about the integrity of the entire pipeline and the consequences of failure, per § 195.452(f)(3).

7. § 195.577 What must I do to alleviate interference currents?

(a) For pipelines exposed to stray currents, you must have a program to identify, test for, and minimize the detrimental effects of such currents.

SLPCO’s Operations and Maintenance Procedure Manual, section 4.9.1, “A. Annual Protection Survey,” did not describe how SLPCO’s corrosion control program would actively identify, test for, and minimize the detrimental effects of stray currents. SPLPCO’s procedures required an annual test point survey, but did include when a close-interval survey, required by § 195.573(a)(2), is necessary and required by SLPCO to address interference. According to SLPCO’s Emergency Response Manual, Appendix E, there are multiple other pipelines that either share rights-of-way or cross SLPCO’s pipeline, which can expose it to stray currents; therefore, SLPCO must amend its procedures to include a program for identifying and alleviating interference currents, per § 195.577(a).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 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 CFR § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 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 (not mandated) that St Louis Pipeline Operating, LLC 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 Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2025-020-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

cc: Barry Croft, Facility Supervisor, St Louis Pipeline Operating LLC,
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Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*