



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

1200 New Jersey Avenue, SE
Washington, DC 20590

November 10, 2025

VIA ELECTRONIC MAIL TO: tampapc@outlook.com

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

Re: CPF No. 3-2025-029-NOPV

Dear Mr. Rose:

Enclosed please find the Final Order issued in the above-referenced case. It makes findings of violation and specifies actions that need to be taken to comply with the pipeline safety regulations. When the terms of the compliance order are completed, as determined by the Director, Central Region, this enforcement action will be closed. Service of the Final Order by e-mail is effective upon the date of transmission and acknowledgement of receipt as provided under 49 CFR § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

LINDA GAIL
DAUGHERTY

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GAIL DAUGHERTY
Date: 2025.11.07 15:06:46
-05'00'

Linda Daugherty
Acting Associate Administrator
for Pipeline Safety

Enclosures (Final Order and NOPV)

cc: David Barrett, Acting Director, Central Region, Office of Pipeline Safety, PHMSA
Greg Lipscomb, St. Louis Pipeline Operating, LLC,
greg.lipscomb@panamericanpipelines.com
Berry Croft, General Manager, St Louis Pipeline Operating LLC,
berry.croft@panamericanpipelines.com, stlouispipelinegm@outlook.com

Edric Kidd, National Pipeline Manager, St Louis Pipeline Operating LLC,
edric.kidd@panamericanpipelines.com

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

St. Louis Pipeline Operating, LLC,

Respondent.

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CPF No. 3-2025-029-NOPV

FINAL ORDER

On August 15, 2025, pursuant to 49 CFR § 190.207, the Acting Director, Central Region, Office of Pipeline Safety (OPS), issued a Notice of Probable Violation (Notice) to St. Louis Pipeline Operating, LLC (Respondent). The Notice proposed finding that Respondent had violated the pipeline safety regulations in 49 CFR Part 195. The Notice also proposed certain measures to correct the violations. Respondent did not contest the allegations of violation or corrective measures.

Pursuant to 49 CFR § 190.213, I find Respondent violated the pipeline safety regulations listed below, as more fully described in the enclosed Notice, which is incorporated by reference:

49 CFR § 195.266 (**Item 1**) — Respondent failed to maintain complete records that show 1) the total number of girth welds and the number nondestructively tested, including the number of rejects and the disposition of each rejected weld; 2) the amount, location, and cover of each size of pipe installed; and 3) the location of each valve for the Lambert Airport Project.

49 CFR § 195.406(a)(2) (**Item 2**) — Respondent failed to provide maximum operating pressure records regarding the design pressure of the components on the Lambert Airport Project.

These findings of violation will be considered prior offenses in any subsequent enforcement action taken against Respondent.

Compliance Actions

Pursuant to 49 U.S.C. § 60118(b) and 49 CFR § 190.217, Respondent is ordered to take the actions proposed in the enclosed Notice to correct the violations. 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 the ordered actions, Respondent may request that the Director close the case. Respondent previously submitted evidence to show appropriate actions have been taken to correct the violations. This evidence is currently under review by the Director. Failure to comply with this Order may result in the assessment of civil penalties under 49 CFR § 190.223 or in referral to the Attorney General for appropriate relief in a district court of the United States.

Warning Item

With respect to Item 3, the Notice alleged a probable violation of 49 CFR § 195.505(h), but did not propose a civil penalty or compliance order for this item. Therefore, this is considered to be a warning item. If OPS finds a violation of this provision in a subsequent inspection, Respondent may be subject to future enforcement action.

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

LINDA GAIL
DAUGHERTY

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GAIL DAUGHERTY
Date: 2025.11.07
15:07:52 -05'00'

Linda Daugherty
Acting Associate Administrator
for Pipeline Safety

November 10, 2025

Date Issued



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

901 Locust Street, Suite 480
Kansas City, MO 64106

NOTICE OF PROBABLE VIOLATION

and
PROPOSED COMPLIANCE ORDER

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

August 15, 2025

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

CPF 3-2025-029-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.), conducted an inspection of St. Louis Pipeline Operating, LLC's (SLPCO) records and facilities in Madison County, Illinois and St. Louis County, Missouri.

As a result of the inspection, it is alleged that SLPCO 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. § 195.266 Construction records.

A complete record that shows the following must be maintained by the operator involved for the life of each pipeline facility:

- (a) The total number of girth welds and the number nondestructively tested, including the number rejected and the disposition of each rejected weld.**
- (b) The amount, location; and cover of each size of pipe installed.**
- (c) The location of each crossing of another pipeline.**
- (d) The location of each buried utility crossing.**

- (e) The location of each overhead crossing.**
- (f) The location of each valve and corrosion test station.**

SLPCO failed to demonstrate that it maintained complete records that show the total number of girth welds and the number of nondestructive tested, including the number of rejects and the disposition of each rejected weld, as required by § 195.266(a). In addition, SLPCO failed to demonstrate that it maintained records of the amount, location; and cover of each size of pipe installed, as required by § 195.266(b). Furthermore, SLPCO failed to demonstrate that it maintained records for the location of each valve, as required by § 195.266(f).

PHMSA inspectors requested during the on-site inspection the Lambert Airport Project records for weld reports, facility drawings, construction drawings, as-built drawings, and Non-Destructive Testing (NDT) reports, which would show the information required by §§ 195.266(a), (b), and (f). SLPCO did not produce records during the on-site inspection. PHMSA issued a Request for Specific Information (RFSI) to SLPCO on October 7, 2024, requesting these records. SLPCO representatives verbally confirmed receipt of the RFSI. However, SLPCO did not provide responsive documents to PHMSA, Central Region. Thus, SLPCO failed to demonstrate that it maintained records compliant with §§ 195.266 (a), (b), and (f). These records are critical to future decision making as it relates to, §§ 195.452(e) and (g) determining risk factors for assessment scheduling and information analysis.

2. § 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. However, for steel pipe in pipelines being converted under § 195.5, if one or more factors of the design formula (§ 195.106) are unknown, one of the following pressures is to be used as design pressure:**
 - (i) Eighty percent of the first test pressure that produces yield under section N5.0 of Appendix N of ASME B31.8 (incorporated by reference, see § 195.3), reduced by the appropriate factors in §§ 195.106(a) and (e); or**
 - (ii) If the pipe is 323.8 mm (12¾ in) or less outside diameter and is not tested to yield under this paragraph, 200 p.s.i. (1379 kPa) gage.**
 - (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 test 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.**

SLPCO failed to ensure its Lambert Airport Project did not operate at a pressure that exceeded the design pressure of all pipeline components pursuant to § 195.406(a)(2). Specifically, PHMSA requested records supporting the design pressure of the components of the SLPCO pipelines. SLPCO provided the of Maximum Operating Pressure Record, but did not provide adequate documentation related to the design pressures of the components in the pipeline system. As a follow-up, PHMSA sent a Request for Specific Information to SLPCO on October 7, 2024, which was verbally confirmed as received by its National Pipeline Manager. However, PHMSA did not receive responsive documents. Absent documentation of the design pressure of the components of the pipeline, SLPCO could not ensure its Lambert Airport Project did not operate at a pressure that exceeded the design pressure of any other component of the pipeline, pursuant to § 195.406(a)(2).

3. § 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;

SLPCO failed to follow its written qualification program by not providing training, as appropriate, to ensure that an individual performing a covered task had the necessary knowledge and skills to perform the covered task in a safe manner, as required by § 195.505(h). During the PHMSA inspection on October 17, 2024, a PHMSA inspector asked a SLPCO employee to take readings from a rectifier. SLPCO records indicated the employee was qualified to perform the OQ Task Code 003.0, “Obtain a Voltage and Current Output Reading from a Rectifier to Verify Proper Performance (1:1),” but the employee did not demonstrate adequate knowledge of how to perform the task safely and correctly. The employee acknowledged his lack of experience with the task and indicated that he did not feel comfortable performing it, so the PHMSA inspector withdrew the request. Additionally, when preparing to enter a deep vault to demonstrate valve operation as covered in Task Code 063.4, “Locally Operate Valves on a Liquid Pipeline System (1:1),” the PHMSA inspector stopped the SLPCO employee from proceeding due to a lack of Confined Entry Permit and proper equipment to enter. SLPCO submitted a Confined Space Training Review Form dated July 24, 2023 to PHMSA afterwards, but during the in-field inspection of the pipeline, the employee did not know the requirements for entering a confined space.

Proposed Civil Penalty

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 \$2,391,412 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 propose a civil penalty assessment at this time.

Proposed Compliance Order

With respect to Items 1 and 2 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.

Warning Item

With respect to Item 3, 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 promptly correct these items. Failure to do so may result in additional enforcement action.

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 3-2025-029-NOPV** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

DAVID A BARRETT

 Digitally signed by DAVID A BARRETT
Date: 2025.08.15 09:30:40 -05'00'

David Barrett
Acting Director, Central Region, OPS
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 St. Louis Pipeline Operating, LLC, a Compliance Order incorporating the following remedial requirements to ensure the compliance of St. Louis Pipeline Operating, LLC, with the pipeline safety regulations:

- A. In regard to Item number 1 of the Notice pertaining to failure to maintain construction records, St. Louis Pipeline Operating, LLC must submit within **90** days of receipt of the Final Order to the Director, PHMSA Central Region, Office of Pipeline Safety, complete weld records, to include: the total number of girth welds, welds nondestructively tested, welds rejected and the disposition of each rejected weld; the amount, location, and depth of cover of each size of pipe installed; and the location of each valve and corrosion test station. For any of the aforementioned information that SPLCO does not have or cannot submit, SPLCO must provide a written plan within **90** days of receipt of the Final Order to the Director, PHMSA Central Region, Office of Pipeline Safety, to supply the information that would have been recorded in the required records.

- B. In regard to Item number 2 of the Notice pertaining to failure to ensure it did not operate at a pressure that exceeded the design pressure of any other component of the pipeline, St. Louis Pipeline Operating, LLC, must submit within **90** days of receipt of the Final Order to the Director, PHMSA Central Region, Office of Pipeline Safety, records to support the established maximum operating pressure (MOP) such as the internal design pressure of the pipe, the design pressure of any other component of the pipeline, and the test pressure of the pipe and any component. In addition, any other records that show the current maximum operating pressure. For any of the aforementioned information that SPLCO does not have or cannot submit, SPLCO must provide a written plan within **90** days of receipt of the Final Order to the Director, PHMSA Central Region, Office of Pipeline Safety, to demonstrate the pipeline components are commensurate with the MOP.

- C. It is requested (not mandated) that St. Louis Pipeline Operating, LLC, maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total the Director, PHMSA Central Region, Office of Pipeline Safety. 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.