

12/05/2024

Via Electronic Submission

Bryan Lethcoe, Director

Southwest Region

Pipeline and Hazardous Materials Safety Administration

U.S. Department of Transportation

8701 S. Gessner Road, Suite 1110

Houston, TX 77074

Re: CPF No. 4-2024-055-NOA Response to Notice of Amendment

Dear Mr. Lethcoe:

Sinclair Transportation Company ("Sinclair") acknowledges receipt of the Notice of Amendment ("Notice"), dated December 03, 2024, issued pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. We appreciate the Pipeline and Hazardous Materials Safety Administration's (PHMSA) review of our Operations and Maintenance (O&M) Manual and the opportunity to enhance our procedures to ensure the highest level of pipeline safety and regulatory compliance.

We have carefully reviewed the items identified in the Notice and the related regulatory requirements. Although our current operations do not involve new pipeline construction or full pipeline replacements that would trigger the installation of Rupture Mitigation Valves (RMVs) under §§ 195.258 and 195.418, we understand PHMSA's directive to incorporate procedures addressing the identification of potential ruptures and the maintenance, repair, and remediation of valves—should RMVs or equivalent technology be required in the future.

Below is our detailed response to each item:

1. Notification of Potential Rupture (§ 195.417) and Related Procedures (§ 195.402(c)(3))

PHMSA Finding:

Sinclair' O&M Manual lacked provisions for personnel to identify and appropriately respond to a potential rupture in accordance with § 195.417.

Sinclair' Response and Proposed Revisions:

We recognize the importance of promptly identifying a potential pipeline rupture and ensuring that operator personnel are equipped with clear, unambiguous procedures. Although our operations currently do not require RMV installation, we will nonetheless enhance our O&M Manual to include:

- **Rupture Identification Criteria:**

We will define the quantitative thresholds and qualitative indicators consistent with § 195.417(a), including the 10% pressure drop within a 15-minute period and other unanticipated, unexplained changes in pressure, flow rate, or equipment function that suggest a potential large-volume release.

- **Notification Protocols:**

Our revised procedures will instruct personnel on immediate notification steps, including

internal operational communication, outreach to our control room, and, where appropriate, prompt communication with local responders, public authorities, and affected stakeholders.

These additions will ensure that our personnel can rapidly detect and respond to a potential rupture, thereby improving our overall safety posture and compliance with § 195.402(c)(3) and § 195.417.

2. Inclusion of RMV Requirements (§ 195.419) in O&M Manual (§ 195.402(c)(3))

PHMSA Finding:

Sinclair' O&M Manual did not include the provisions of § 195.419(a)-(h), which detail requirements for RMVs or alternative equivalent technology regarding rupture identification and timely valve shut-off.

Sinclair' Response and Proposed Revisions:

While Sinclair currently has no newly constructed or fully replaced pipeline segments triggering mandatory RMV installations, we acknowledge that our O&M Manual must reflect readiness to comply with these regulations should such conditions arise. We will amend the O&M Manual to incorporate the full spectrum of provisions under § 195.419(a)-(h), including:

- **Rupture Mitigation Valves (RMVs) and Equivalent Technology:**
Detailed procedures governing the installation, operation, and maintenance of RMVs or alternative technology, ensuring alignment with the requirements for rapid rupture isolation.
- **Valve Shut-Off Timing and Criteria:**
Specific criteria for identifying a rupture event that necessitates an RMV closure, as well as maximum allowable response times.
- **Integration into Control Systems:**
Guidelines to ensure that RMVs, if installed, will be fully integrated into our supervisory control and data acquisition (SCADA) system or equivalent monitoring platforms to facilitate rapid detection and response.

By proactively including these procedures, we will ensure that Sinclair is prepared to meet the RMV requirements should future operational changes necessitate them.

3. Valve Maintenance and Remediation Procedures (§ 195.420(f))

PHMSA Finding:

Sinclair' O&M Manual lacked procedures for repairing or replacing inoperable valves, designating alternative compliant valves within prescribed timeframes, and documenting interim measures to maintain safety.

Sinclair' Response and Proposed Revisions:

We will amend our O&M Manual to include clear and enforceable procedures for valve remediation, addressing both RMVs and any other valves critical to system integrity:

- **Repair or Replacement Timeline:**
Procedures ensuring that any inoperable valve (including RMVs, if present) is repaired or replaced as soon as practicable, and no later than 12 months after discovery of the valve's inability to maintain shut-off, in accordance with § 195.420(f)(1).
- **Alternative Compliant Valve Designation:**
Steps to identify and designate an alternative compliant valve within 7 calendar days of finding an inoperable valve, as required by § 195.420(f)(2).
- **Interim Response Planning:**
Documentation of interim response plans to maintain safety until repairs or replacements are completed. This will ensure that pipeline integrity and environmental protection are upheld during any transitional period.

These additions will guarantee that our maintenance protocols not only address routine operations but also promptly and systematically remediate any valve deficiencies.

Commitment to Compliance and Continuous Improvement

Sinclair is committed to maintaining the highest standards of pipeline safety, reliability, and regulatory compliance. Although the RMV requirements apply primarily to new or significantly altered pipelines, we understand the importance of aligning our internal documentation and procedures with PHMSA's regulatory framework. Our revised O&M Manual will encompass the identification of potential ruptures, RMV operation and maintenance guidelines, and robust valve remediation strategies.

Request for Approval and Timeline

We do not contest the Notice and will proceed with the required amendments. We anticipate completing the necessary revisions to our O&M Manual within 90 days of receipt of this Notice. Should we require additional time due to the complexity of updates, we will promptly submit a written request for an extension, explaining the necessity for additional time.

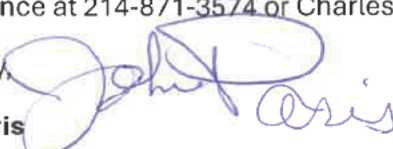
Upon completion, we will submit our amended O&M Manual and any supporting materials to your office for review. Documentation of safety improvement costs will also be maintained, and we will provide the requested total associated with fulfilling this Notice to PHMSA.

Conclusion

Sinclair values PHMSA's oversight and guidance. By implementing the recommended improvements, we will strengthen the safety and integrity of our pipeline operations and ensure continued compliance with applicable regulations. We appreciate your time, attention, and assistance in this matter.

If you have any questions or require further information, please contact Charles Curl, Director, Compliance at 214-871-3574 or Charles.curl@hfsinclair.com

Sincerely,

A handwritten signature in blue ink, appearing to read "John Paris", is written over the word "Sincerely," and the printed name "John Paris".
John Paris

Vice President, Safety & Operations
Sinclair Transportation Company