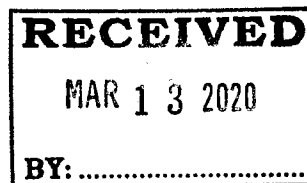


OMEGA PARTNERS



March 11, 2020

Via FedEx and email to:

dustin.hubbard@dot.gov and jason.dunphy@dot.gov

Dustin Hubbard

Director, Western Region

U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration

12300 W. Dakota Ave., Suite 110

Lakewood, CO 80228

Re: Omega Partners Reno, LLC

Notice of Enforcement#: CPF 5-2019-6002, 6003M, and 6004W

Dear Mr. Hubbard:

Omega Partners Reno LLC ("OP Reno")¹ writes in regard to the above-referenced Notice of Amendment and Proposed Compliance Order. Attached with the hard copy of this letter is a flash drive containing updated copies in electronic format² of the following documents relating to OP Reno's operations:

- Operator Qualification (OQ) Manual (rev. February 2020);
- Operations Maintenance & Emergency Procedure (OM&E) Manual (rev. January 2020),
- Integrity Management Plan (IMP) (rev. December 2019)
- Public Awareness Program (rev. December 2019);

Please note that OP Reno's Oil Spill Response Plan is undergoing final revisions anticipated to be complete this month. OP Reno will provide a copy of its revised Oil Spill Response Plan upon its completion.

Additionally, for the completeness and clarity of OP Reno's response, below we also address the items noted in the Notice of Amendment and Proposed Compliance Order.

CPF 5-2019-6003M:

1. § 195.402 Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E to include the safety practices and procedures outlined in API Pub. 2026. The tank inspection procedures in PMP-SPK-01 have been updated. Please note that these tanks contain jet fuel and the seals have been removed from internal floating roofs because the floating roof is not required for emissions control.

¹ On November 5, 2012, OP Reno LLC filed a certificate of amendment changing its name to Omega Partners Reno LLC.

² As requested by your letter of September 18, 2019, OP Reno submits its documents in electronic format. OP Reno submits its documents via a flash drive submitted to the office of /PHMSA's Western Region.

2. § 195.403 Emergency response training – Section 6.4 has been updated to reference other Sections of the plan (i.e., 6.2 – Part 194, 6.3 – OSHA, etc.).
3. § 195.403 Emergency response training – Section 6.4 has been updated ensure that training occurs at least once each calendar year, but also to ensure that the training interval will not exceed 15 months.

From CPF 5-2019-6002:

1. § 195.452 – Pipeline integrity management in high consequence areas – OP Reno has developed and implemented and Integrity Management Plan (attached), which contains an HCA analysis in Appendix A of the plan.
2. § 195.440 – Public awareness – OP Reno has developed and implemented a written continuing public education program (attached) that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162.
3. § 195.505 – Operator Qualification program – OP Reno has developed and implemented a written Operator Qualification (OQ) Program (attached).
4. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E Manual to include a procedure for establishing and maintaining liaison with fire and police (Attached – refer to pages 1-20).
5. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E Manual to include a procedure for receiving, identifying, and classifying notices of events which require immediate response by the operator (Attached – refer to pages 1-19).
6. § 195.403 – Emergency response training – OP Reno has updated the OM&E Manual to include a training program (Attached – refer to Section 7).
7. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E Manual to include a procedure for posting and maintaining signs visible to the public (Attached – refer to pages 1-23).
8. § 195.434 – Signs – OP Reno has posted the appropriate signage around its Sparks Terminal.
9. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E Manual to include a procedure for personnel to recognize safety conditions that are subject to the reporting requirements of §195.55 (Attached – refer to pages 2-7).
10. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E Manual to include a procedure for protection of pipelines against atmospheric corrosion (Attached – refer to PMP-SPK-02, Page 3 of 4).
11. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E Manual to include a procedure for monitoring of pipelines against atmospheric corrosion (Attached – refer to PMP-SPK-02, Page 3 of 4).
12. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has updated the OM&E Manual to include a corrective action procedure for identified deficiency in corrosion control (Attached – refer to PMP-SPK-02, Page 4 of 4).

CPF 5-2019-6004W:

1. §195.202 – Compliance with specifications or standards – OP Reno has updated the OM&E Manual to include a procedure for the design and construction of new facilities (Attached – refer to pages 1-24).
2. §194.121 – Response plan review and update procedures – OP Reno is updating the Oil Spill Response Plan and will provide a copy upon its completion.
3. § 195.402 – Procedural manual for operations, maintenance, and emergencies – OP Reno has reviewed and updated the OM&E Manual within the last 15 months (attached).
4. §195.436 – Security of facilities – OP Reno has reviewed its security and has updated it accordingly. OP Reno has replaced the damaged gate observed at the time of the November 2018 inspection and has installed bollards near the gate to protect it from damage.

We appreciate your time and attention in this matter. With the exception of the Oil Spill Response Plan, which will be submitted upon its completion, OP Reno respectfully submits that these documents address the issues raised in the Notice of Amendment and Proposed Compliance Order.

If you have any questions or need additional information, please contact me directly via telephone at (314) 744-3315 or email at john@omegapartnersllc.com, or Mr. Larry Wright, our manager of terminal operations, via telephone at (706) 604-7736 or email at lwright@omegapartnersllc.com

Sincerely,



Mr. John R. Niemi
Compliance Manager - Omega Partners Reno LLC
john@omegapartnersllc.com

Attachments: Operator Qualification Manual
 Operations Maintenance & Emergency Procedure Manual
 Integrity Management Plan
 Public Awareness Program

cc: Vern Choquette, Bear Creek Environmental Consultants
 (vchoquette@bearcreekconsultants.com)

 Kameron Murphy, General Counsel (kmurphy@omegapartnersllc.com)

 Larry Wright, Manager, Terminal Operations (lwright@omegapartnersllc.com)