

**NOTICE OF AMENDMENT**

**CERTIFIED - RETURN RECEIPT REQUESTED**

October 28, 1997

Mr. Robert Rose  
President  
Tampa Pipeline Corporation  
P.O. Box 261628  
Tampa, Florida 33685-1628

CPF No. 37524M

Dear Mr. Rose:

On July 21-25, 1997, representatives of the Central Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of Title 49 of the United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities and records for St. Louis Pipeline Corporation at Hartford, Illinois.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The items inspected and the probable violations are:

**§ 195.402 Procedural Manual for Operations, Maintenance, and Emergencies.**

**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, as specified in § 195.402 (c).**

Review of St. Louis Pipeline Corporation's O&M procedural manual found the procedures were inadequate. The procedures require expansion to include additional detail in regard to the following items, as reviewed with your personnel during the inspection:

- a) Safety-related conditions, as specified in § 195.56.

- b) Design of new or replacement segments of the pipeline system must be designed and constructed to allow the passage of smart pigs, as specified in § 195.120(a).
- c) Verification of the removal of arc burns, as specified in § 195.226(b).
- d) Nondestructive testing of welds, as specified in § 195.234.
- e) Testing pipelines, as specified in § 195.302.
- f) The gathering of data and submitting incident reports (7000.1), as required by § 195.402(c).
- g) Analyzing pipeline accidents to determine the cause and minimizing the potential for a recurrence of the accident, as specified in § 195.402(c)(5&6).
- h) Protecting personnel in trenches, as specified in § 195.402(c)(14).
- i) Need to expand abnormal operations procedures to include procedures for: loss of communications, personnel errors, and checking variations from normal operations after an abnormal operation, as specified in § 195.402(d).
- j) Records retention, as specified in § 195.404(c).
- k) The MOP of pipeline segments and verifying that new or replacement facilities are commensurate with existing MOP, as required by § 195.406
- l) Installation of permanent and temporary line markers, as specified in § 195.410.
- m) Patrolling the pipelines at the frequencies specified in § 195.412(a).
- n) External corrosion control, as specified in § 195.416 (including casing investigation procedures and atmospheric corrosion procedures).
- o) Internal corrosion control, as specified in § 195.418.
- p) Valve maintenance and inspection, as specified in § 195.420.
- q) Operation of scraper and sphere facilities, as specified in § 195.426.

r) Overpressure protection device inspections, as required by § 195.428.

s) Installation of required signs, as specified in § 195.434.

t) Security of facilities, as specified in § 195.436.

**Emergencies: The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs, as specified in § 195.402 (e).**

Adequate emergency procedures were not available at the time of the inspection.

Accident procedures need to be expanded to include a post accident review of employee activities to determine if existing procedures are adequate, as specified in § 195.402(e).

In regard to the deficiencies in your procedures noted under items §195.402, the Office of Pipeline Safety is issuing to you a Notice of Amendment requiring that your procedures be amended to comply with the requirements of the regulations referenced.

When it is found that an operator's procedures are inadequate, 49 CFR §190.237, provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures. This letter serves to provide you with the notice of the inadequate procedures and the response options as prescribed under §190.237. Under §190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receipt of this notice. If additional time is required to revise the procedures, you may request additional time by contacting the Regional Director.

Sincerely,

Ivan A. Huntoon  
Director, Central Region  
Office of Pipeline Safety