U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

DEC 31 2002

Mr. Larry Broussard
Pipeline Integrity Manager
CITGO Pipeline Company
6100 South Yale Avenue
Tulsa, OK 74136

Re: CPF No. 2-2002-5008M

Dear Mr. Broussard:

Enclosed is the Order Directing Amendment issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It makes a finding of inadequate procedures and requires that you amend your integrity management program procedures. When the terms of the Order are completed, as determined by the Director, Southern Region, OPS, this enforcement action will be closed. Your receipt of the Order Directing Amendment constitutes service of that document under 49 C.F.R. § 190.5.

Sincerely,

for Gwendolyn M. Hill
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Logged 1/3/03

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590

In the Matter of	)	
	)	
CITGO Pipeline Company,	)	CPF No. 2-2002-5008M
	)	
Respondent.	)	
	)	

ORDER DIRECTING AMENDMENT

On January 23-24, 2002, pursuant to 49 U.S.C. § 60117, representatives of the Central and Southern Regions, Office of Pipeline Safety (OPS), inspected CITGO Pipeline Company's (Respondent's) integrity management program at Respondent's facility in Tulsa, Oklahoma. As a result of the inspection, the Southern Regional Director, OPS, issued to Respondent, by letter dated April 29, 2002, a Notice of Amendment (NOA). The NOA alleged inadequacies in Respondent's integrity management program and proposed to require amendment of Respondent's procedures to comply with the requirements of 49 C.F.R. § 195.452(b).

Respondent responded to the NOA by letter dated May 30, 2002 (Response). Respondent did not contest the allegations set forth in the NOA and did not request a hearing, consequently Respondent waived its right to one. Respondent described the actions it is taking to address the inadequacies in its procedures that were identified in the NOA.

In its Response, Respondent indicated that it has adopted an overland transport analytical model and is implementing procedures that will address the inadequacies listed in the NOA. Respondent explained that its model will reflect spill migration via streams and waterways. Respondent stated that it has conducted, and will implement, air dispersion modeling of HVLs, created a ½-mile buffer zone around each "other" pipeline facility, and will identify added HVL pipeline segments which could affect HCAs. Finally, Respondent stated that it has "initiated a comprehensive review to insure that all in-service pipeline segments and related facilities have been captured and the associated affects [sic] to HCA's have been completely identified." Respondent did not submit its amended procedures showing it has incorporated these changes.

Accordingly, I find that Respondent's integrity management program procedures are inadequate to ensure safe operation of its pipeline system. Pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237, Respondent is ordered to make the following changes to its integrity management program procedures. **Respondent must:**

1. Amend its procedures for identifying pipeline segments that could affect high consequence areas (HCAs) to consider spill migration via streams or waterways beyond a 1/4 mile buffer for all products, including highly volatile liquids (HVLs).

2. Amend its procedures for identifying pipeline segments that could affect HCAs to account for air dispersion of HVLs and overland transports (ditches, gullies, dry creek beds, etc.).

3. Amend its procedures for identifying pipeline segments that could affect HCAs to include "other" pipeline facilities, such as delivery terminals, breakout tanks, and pump stations. Include adequate technical justification for implementing a ½-mile buffer zone around these "other" pipeline facilities.

4. Verify its identification process to ensure all segments and facilities that could affect HCAs have been identified.

5. Submit the amended procedures to the Regional Director, Southern Region, OPS within 30 days following receipt of this Order Directing Amendment.

The Director, Southern Region, OPS, may grant an extension of time to comply with any of the required items upon a request by the Respondent demonstrating good cause for an extension.

The terms and conditions of this Order Directing Amendment are effective upon receipt.

Failure to comply with this Order may result in the assessment of civil penalties of up to $25,000 per violation per day, or in the referral of the case for judicial enforcement.

James K O'Steen

Stacey Gerard
for Associate Administrator
for Pipeline Safety

DEC 31 2002

Date Issued