



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

820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628  
**609.989.2171**

**WARNING LETTER**

**OVERNIGHT EXPRESS MAIL**

November 26, 2012

Mr. David Chalson, Vice President of Operations  
Sunoco Pipeline L.P.  
2700 West Passyunk Avenue  
Philadelphia, PA 19145

**CPF 1-2012-5020W**

Dear Mr. Chalson:

During the week of September 17, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your pipelines in East Boston, MA.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

- 1. §195.573 What must I do to monitor external corrosion control?  
(c) Rectifiers and other devices. You must electrically check for proper performance each device in the first column at the frequency stated in the second column.**

<b>Device</b>	<b>Check frequency</b>
Rectifier.....	At least six times each calendar year, but with
Reverse current switch	intervals not exceeding 2 ½ months
Diode	
Interference bond whose failure would jeopardize structural protection	

**1-2012-5020W**

Sunoco failed to inspect each cathodic protection rectifier six times each calendar year, but with intervals not exceeding 2 1/2 months, to ensure that it was operating.

Sunoco missed 2 rectifier readings between 9/15/2011 and 3/13/2012 at Station 9+00 Frankford Street and Lowell Street Rectifier.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. 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 correct the item identified in this letter. Failure to do so will result in Sunoco Pipeline LP being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, please address your correspondence to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628 and please refer to **CPF 1-2012-5020W**. Be advised that all material you submit in response to this enforcement action is subject to being 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).

Sincerely,

Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration