



**Sunoco Logistics**



**Sunoco Pipeline L.P.**

4041 Market St  
Aston, PA 19014-3197

October 31, 2013

VIA FEDEX

Byron Coy, Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
820 Bear Tavern Road, Suite 306  
West Trenton, NJ 08628

RE: NOPV CPF 1-2013-5021 – Control Room Management – Montello, PA

Dear Mr. Coy:

Sunoco Pipeline L.P. (SPLP) hereby contests items, and requests an oral hearing on matters, listed in the Notice of Probable Violation and Proposed Compliance Order in the above referenced matter.

SPLP intends to raise the following issues at the hearing:

1. The finding reads “Specifically, the CRM Training Rule procedure did not address reviewing historical alarm logs to identify candidate scenarios for training.” SPLP does not believe that a review of historical alarm logs is mandated in the regulation as the only means to identify candidate scenarios for training on the recognition of abnormal operating conditions that are likely to occur simultaneously or in sequence.
2. SPLP uses other methods for identifying its training scenarios that meet or exceed the training requirement.
3. Notwithstanding the above arguments, SPLP acknowledges that its written process could be improved by adding further detail on training. While SPLP will take steps to specify a written process for reviewing historical alarm logs to identify training scenarios, we would propose that further discussion occur with PHMSA to identify exactly what is being proposed by PHMSA. However, this amendment should not be considered a Notice of Probable Violation but a Notice of Amendment and request that this be modified accordingly.

SPLP reserves the right to identify additional issues that will be raised at the hearing upon further reflection and/or advice from counsel who will represent SPLP at the hearing. SPLP is agreeable to a telephonic hearing at a mutually convenient date and time. Sunoco Pipeline L.P. is also prepared to discuss entry of a consent order in lieu of a hearing, as allowed by 40 CFR parts 190.290 and 219. Such process may save both parties the time and expense of a hearing.

If you have any questions regarding the matters herein, please do not hesitate to call me.

Sincerely,

David Chalson  
Vice President of Operations

cc: Mr. Kevin Dunleavy, Chief Counsel, Sunoco, Inc.