



United Refining Company • Petroleum Products

Environmental Department

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August 6, 2012

RECEIVED AUG 17 2012

JK

Mr. Byron Coy, PE
Director, Eastern Region
Pipeline Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

**RE: CPF 1-2012-5015M
Kiantone Pipeline Corporation**

Dear Mr. Coy:

This letter and attachment is in response to your letter dated July 17, 2012 regarding an inadequacy noted during an inspection of Kiantone Pipeline conducted on December 5, 2011. The deficiency was for not having an adequate procedure for performing an annual review of the procedure manual. Specifically, it was noted that Kiantone did not provide details on how to perform and document the annual review.

Kiantone Pipeline disagrees with the noted inadequacy and believes it is in compliance with the requirement. Attached please find the pages from Kiantone's O&M Manual that supports this belief. Procedure 1.5.1 of the attachment clearly prescribes a process for review and update of the manual that ensures documentation, distribution of updates, and notification/re-training/re-qualification of personnel affected by any changes during the review. Kiantone is not sure how this is inadequate and requests further clarification.

Kiantone believes this procedure may have been overlooked during the audit as the title did not include the word "Manual". To ensure there is no confusion during future audits, Kiantone has added the word "Manual" to the title of the procedure so that it now reads, "Procedure 1.5.1 – Annual Review of O&M Procedures Manual." Kiantone hopes PHMSA finds this change satisfactory and can close out this NOA.

In addition, please send all future correspondence to Daniel Sobina, Regulatory Compliance Manager, United Refining Company, 15 Bradley Street, Warren, PA 16365 to ensure it is properly received.

If you have any questions or comments, feel free to contact me at the above number.

Very truly yours,

UNITED REFINING COMPANY

Daniel Sobina
Regulatory Compliance Manager

Att.



1.5 O&M PROCEDURES MANUAL REVIEW PROCESS & FREQUENCY

This Operations & Maintenance Procedures Manual is scheduled for reviews and updates once each calendar year, at intervals not exceeding 15 months. The goals of this review are to:

- Ensure that each section of the O&M Manual, including design requirements, facility maintenance, facility operation, construction, pressure testing, welding, and nondestructive testing, is consistent with the requirements of Part 195.
- Ensure that a safe and functional pipeline system is maintained. The safety of Kiantone personnel and approved contractors, the general public, and Kiantone facilities is achieved by the consistent application of the procedures contained in the O&M Manual.

The Kiantone Pipeline Manager or designate is responsible for conducting the annual review of the O&M Procedures Manual. This review follows procedure 1.5.1 –Annual Review of O&M Procedures. This procedure along with all other O&M procedures is located behind the Procedure tab at the back of this plan. Procedures are modified if deficiencies are found. Any procedure changes follow procedure 1.5.2 - Changing O&M Procedures.

In addition to the annual review, personnel may request changes to O&M procedures at any time, as described in Procedure 1.5.2, Changing O&M Procedures.

Forms

Request for Revision to O&M Procedure, Form 1.5.2.

Procedures

Annual Review of O&M Procedures, Procedure 1.5.1

Changing O&M Procedures, Procedure 1.5.2



Procedure 1.5.1 – Annual Review of O&M Procedures

Responsibility	Action
Kiantone Pipeline Manager (or designate)	<ol style="list-style-type: none">1. Review O&M Procedures Manual and complete any required changes to Kiantone operations and maintenance procedures.2. Update O&M Procedures Manual version number to reflect the revision date.3. Update O&M Procedures Manual Revision History in Appendix I to document that an annual review was completed.4. Print and distribute the updated O&M Procedures Manual to authorized personnel.5. Ensure notification, re-training or re-qualification of affected personnel is completed.