



Sunoco Logistics Partners L.P.
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August 22, 2013

VIA ELECTRONIC MAIL AND FEDEX
Mr. Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
820 Bear Tavern Road, Suite 103
Trenton, NJ, 08628

RE: CPF-1-2013-5012M (Notice of Amendment)
Inspection of SPLP Operating and Maintenance Procedures

Dear Mr. Coy,

We are in receipt of your Notice of Amendment (NOA) dated July 16, 2013, regarding the above referenced inspection led by PHMSA's Eastern Region. The NOA required Sunoco Pipeline L.P. (SPLP) to modify its procedures as summarized below. Please accept this as SPLP's response to the NOA.

While SPLP believes that its plans and procedures are currently adequate to assure safe operation of its pipeline facilities, we are open to re-evaluating our programs and procedures based on feedback provided by PHMSA and improving the procedures, where warranted. We have already begun the process to review the various procedures and revise them as necessary based on your letter. An item by item response to the NOA based on your findings is included below.

Some of these changes are expected to involve considerable coordination with several of our engineering and operating groups. We thereby plan to have the required procedural changes completed and implemented by no later than March 31, 2014. We will also be prepared to submit required documentation to your office on or before that date.

Should you have any questions or require further information, please contact David Born of our Sugar Land Texas Office at 281-637-6497.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be "David R. Chalson", with a long horizontal line extending to the right.

David R. Chalson
VP, Operations
Sunoco Pipeline L.P.

cc: David Born, DOT Compliance Supervisor, Sunoco Pipeline LP
Leif Jensen, Manager, Asset Integrity, Sunoco Pipeline LP
Gus Borkland, Director, HES&S, Sunoco Pipeline LP
Kevin Dunleavy, Chief Counsel, Sunoco, Inc.

1. §195.402 Procedural manual for operations, maintenance and emergency response.

(a) General. 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. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Sunoco has a Maintenance Manual which is inclusive of the requirements listed in §195.402(c). During the course of the inspection, it was apparent that the operating and maintenance staff was reliant on Sunoco's Operator Qualification Covered Task Procedures (OQP) which provides more detailed guidance in the performance of many operating and maintenance tasks. A listing of the related procedures is included in Appendix F of the OQP. Given the usage of these procedures with respect to the task performance the operator failed to link the Covered Task Procedures to its Maintenance Manual.

SPLP RESPONSE: The Operator Qualification Written plan and Appendix F- Covered Task Procedures are already referenced in SPLP's DOT Maintenance Manual. Specifically, we refer you to Section 195.402 a-02 and Section 195.505-02 Item 4.

2. §195.402 Procedural manual for operations, maintenance and emergency response.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1)...

(5) Analyzing pipeline accidents to determine their causes.

Procedure MM 195.50 describes incident reporting. It fails to mention incident investigation. Sunoco has a separate guidance document, Root Cause Analysis and Required Incident Documentation, which it utilizes in practice. This incident investigation tools are not referenced in its written plan.

SPLP RESPONSE: SPLP will add reference to Procedure OPER-PR-002 Spill Reporting, Root Cause Analysis and Documentation, and will add a new section to Maintenance Manual Section 402 (C) 5 with a reference to the document.

3. §195.402 Procedural manual for operations, maintenance and emergency response.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1)...

(13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

Procedure MM 195.402(c) (13) describes the review process but it fails to specify the intervals between the reviews relying on the term "periodically."

SPLP RESPONSE: The regulation does not define 'periodically'. SPLP does follow periodic review on an annual basis for the referenced items. We will revise the SPLP DOT Maintenance Manual to specify documentation of periodic review is on record. Maintenance Manual Section 195.402 (C) 13 under SPLP REQUIREMENTS / PROCESS DESCRIPTION identifies reviews are carried out in the course of manual reviews, OJT direct observations, OIT Meetings, MEITO meetings and critiques conducted following emergency response drills and events.

4. §195.402 Procedural manual for operations, maintenance, and emergencies.

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs;

(1)...

(6) Minimization of public exposure to injury and probability of accidental ignition by assisting with evacuation of residents and assisting with halting traffic on roads and railroads in the affected area, or taking other appropriate action.

The Facility Response Plan (FRP) Section 4 and Appendix D fail to provide specific guidance to the operator's response personnel with respect to the evacuation of nearby residents and assisting [public officials] in the halting of traffic on roads, railroads and other travelled ways with the intent to protect the public from injury and to prevent accidental ignition.

SPLP RESPONSE: SPLP will revise the FRP to include a description of how SPLP follows incident protocols in working with public officials to assist with evacuating residents and assisting with traffic and other details as noted.

5. §195.402 Procedural manual for operations, maintenance, and emergencies.

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs;

(1)...

(8) In the case of failure of a pipeline transporting a highly volatile liquid, use of appropriate instruments to assess the extent and coverage of the vapor cloud and determine the hazardous areas.

The FRP Section 4 and Appendix D provide no details for measuring coverage of vapor clouds and hazardous areas formed by spills of HVLs, nor does it specify the instrumentation employed to make these determinations.

SPLP RESPONSE: SPLP's FRP for our Inkster area addresses our current process on page 22 of 127 and Table 4-1. SPLP will revise the FRP to include a description of the process by which SPLP measures the coverage of vapor clouds and will list types of instruments to be used

6. §195.403 Emergency Response Training.

(a) Each operator shall establish and conduct a continuing training program to instruct emergency response personnel to:

(1)...

(2) Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions;

In the FRP Section 5, Table 5-7 the operator satisfies the training requirements with a software program entitled Knowledge Wire. This tool is not referenced in the FRP.

SPLP RESPONSE: Knowledge Wire will no longer be supported by the provider company after 12/31/2013. SPLP will upgrade to a newer version of similar software. SPLP will make reference to the new system in MM and FRP Documents.

7. §195.403 Emergency Response Training.

(a) Each operator shall establish and conduct a continuing training program to instruct emergency response personnel to:

(1)...

(3) Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action;

Sunoco presented FRP Section 5 with Table 5-7 and Procedure HS-G-027 (Health, Environment, Safety and Security Training Program) as the means to satisfy this requirement. These documents failed to list specific training to address the recognition prediction and corrective action requirements in this section.

SPLP RESPONSE: While SPLP has training programs in place, SPLP will add specific training modules to address the recognition prediction and corrective action requirements as an appendix to HS-G-027.

8. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1)...

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart [F] and subpart H of this part.

Contained within Subpart F is the following section:

§195.428 Overpressure safety devices and overfill protection systems

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 1/2 months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

Sunoco presented OQP 221. Proc. 195.428 and Form 30696, w/Supplements A, B, C and E. These documents list the inspection; testing and record requirements associated with overpressure and overfill protection. The procedures fail to specify the means or calculation used to verify capacity of relief devices (including thermal), nor is the capacity verification noted on the supplement forms (records).

SPLP RESPONSE: SPLP designs its pressure relief devices based on the system's operating parameters at the time they are installed. These devices are then inspected at the required intervals to ensure they are functional and able to relieve the capacity necessary to maintain the safe operation of the system. Any changes that could impact the operations of the pipeline would require that the change go through SPLP's Management of Change (MOC) process. This process is designed to ensure that the system is operated safely. This includes re-evaluating the required relief capacity of the impacted pressure relief devices.

SPLP will review our procedures and associated documentation requirements and revise them accordingly. This will include a review of our MOC Procedure, PR-11-0039 to clarify that relief valve capacity must be verified upon operational changes that exceed design.

9. §194.402(c)(3) with respect to the following section:

§195.436 Security of facilities.

Each operator shall provide protection for each pumping station and breakout tank area and other exposed facility (such as scraper traps) from vandalism and unauthorized entry.

Sunoco Procedure 436 failed to require any timely repair to its security barriers if the operator observes flaws during patrols, routine maintenance or reports from the public.

SPLP RESPONSE: SPLP will revise Maintenance Manual Section 195.436 to include language that provides for immediate notification to the appropriate supervisor, directions for assessing the risk, directions for any remedial action to be taken and timing for completing repairs.

10. §195.579 What must I do to mitigate internal corrosion?

(b) Inhibitors. If you use corrosion inhibitors to mitigate internal corrosion, you must—

(1)...

(2) Use coupons or other monitoring equipment to determine the effectiveness of the inhibitors in mitigating internal corrosion; and

Sunoco employs coupons and the R probe to monitor the effectiveness of the inhibitors in mitigating internal corrosion. Their procedure to address the requirements of 195.479 fails to specify that measurements be taken of quantitative parameters which would dictate the need for adjustments in its inhibitor addition rate.

SPLP RESPONSE: SPLP monitors changes in measurements of quantitative parameters associated with the R probe and coupons. Minute changes in R probe readings do not necessarily dictate on their own the need for adjustments to inhibitor addition rate. Therefore, the SPLP DOT Maintenance Manual will be revised to include a reference to a procedure/process document that will include details for how internal corrosion is monitored and managed.