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October 28, 2015

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

Re: NOTICE OF AMENDMENT CPF 1-2015-5013M.
NuStar Terminals Operations Partnership L.P.
Linden Terminal

Dear Mr. Coy:

NuStar Terminals Operations Partnership L.P. (hereafter "NuStar") respectfully submits this response to the Notice of Amendment (NOA) dated August 31, 2015. Below is an itemized list of apparent inadequacies PHMSA identified in NuStar's O&M Manual Sections 309 & 316 and a summary of NuStar's response:

PHMSA list of inadequacies:

- 1) "NuStar's written procedures, Operation and Maintenance (O&M) Manual 'Section 309 Breakout Tanks' is inadequate in that it does not establish the retention requirements for Breakout Tank records in accordance with API Standard 653."
- 2) "NuStar's procedure 'Section 316 Pressure and Unit Safety Devices, revised December 30, 2011 does not provide sufficient guidance on conducting and documenting relief valve inspections, such as: 1) What criteria are used to determine an acceptable "as found" relief pressure. 2) What actions must be taken if the relief valve 'as-found' pressure does not meet the criteria. 3) What are the definitions of the terms 'set pressure' and 'set point.' 4) What are the criteria for determining 'pass' and 'fail.' 5) What documentation is required and where it must be recorded."
- 3) "NuStar's written procedures in its Operations and Maintenance (O&M) Manual for Section 309 Breakout Tanks are inadequate. NuStar's O&M Section 309 Breakout Tanks does not adequately address the requirements of API Standard 653 'Tank Inspection, Repair, Alteration, and Reconstruction' (3rd Edition) Section 6, paragraphs 6.3.3-Ultrasonic Thickness Inspection, Section 6.4-Internal Inspection, and Section 6.9-Reports, incorporated by reference in §195.3(b)(19)."

NuStar response:

- 1) Amended O&M Manual Section 309, 4-Records Retention to address PHMSA item #1.
- 2) Amended O&M Manual Section 316, 3.1.1-Pipeline Overpressure Safety Devices and Appendix C-Definitions to address PHMSA item #2.



- 3) Amended O&M Manual Section 309, 3.2.2.1-API 653 External & 3.2.3.1-API 653 Internal to address PHMSA item #3.

Please advise if these proposed changes are acceptable to address the NOA. The revised Section 309 and Section 316 are attached for your review. If you have questions, I may be reached by telephone at (210) 918-2951.

Regards,

FOR **John A. Roller**
Vice President, Terminal Operations
NuStar Terminals Operations Partnership L.P.

cc: Bill Bannister, Director of Operations – East Region
Christopher Butler – Executive Director HS
Christopher Burnett – Executive Director Regulatory Affairs & Customs
Evonne McKinley, Sr. Mgr. HSE Regional
Scott Alfaro, Supervisor Pipeline Safety