

July 24, 2020

Mr. Robert Burrough  
Director, Eastern Region  
PHMSA, U.S. Department of Transportation  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628  
robert.burrough@dot.gov

Re: CPF 1-2020-005, Response to Notice of Amendment

Dear Mr. Burrough:

Bayonne Energy Center, LLC, (herein referred to as BEC) confirms receipt of Notice of Amendment (NOA) and Proposed Compliance Order CPF 1-2020-005.

BEC does not contest the findings and respectfully submits the following information documenting completed actions associated with both findings.

**Proposed Notice of Amendment #1 [§192.605(b)(2)]:**

BEC's *Pipeline Operations and Maintenance Manual* did not adequately include details in its procedures of its process to inspect and evaluate atmospheric corrosion on its pipelines in accordance with § 192.481, as required by § 192.605(b)(2).

**Completed Actions:**

BEC has updated Section 20.3.4 of their *Pipeline Operations and Maintenance Manual*, as provided in Attachment A. The updated manual, revision 4 dated June 2020, was reviewed and approved for release.

**Proposed Compliance Order #2 [§192.907]**

Section 8.4.4 and subsections of BEC's *Integrity Management Plan* did not adequately address how data is gathered and assessed and what data is required in accordance with § 192.917(b).

**Completed Actions:**

BEC has updated Section 8.4.4 as provided in Attachment B. Table 8 and Section 3.4 are also provided to easily review the section 8.4.4 cross references. The updated plan, revision 2 dated June 2020, was reviewed and approved for release.

---

BEC is formally submitting this response letter to ensure full compliance with the items noted during inspection and this NOA.

Sincerely,



Mr. Thomas Miller  
President  
Bayonne Energy Center, LLC  
832 Red Oak Lane  
Sayreville, NJ 08872

cc: Matthew Valerio, PHMSA General Engineer/Pipeline Inspector – Eastern Region, via email

---