

May 29, 2020

Robert Burrough  
Director, Eastern Region  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
840 Bear Tavern Road, Suite 300  
West Trenton NJ 08628

**RE: Notice of Amendment – CPF 1-2020-5007M**

Dear Mr. Burrough,

On April 30, 2020 PBF Energy Inc. received a Notice of Amendment (NOA) CPF 1-2020-5007M from an integrated inspection performed from August 20-22, 2019 and September 24-27, 2019 on our Delaware Pipeline Company's (Delaware Pipeline) records and procedures by representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA). PHMSA states that, on the basis of the inspection, it has identified an apparent inadequacy found within Delaware Pipeline's O&M plan.

The NOA states that Delaware Pipeline's written procedures were inadequate. Specifically, Delaware Pipeline's CV-005(B) Internal Corrosion Control Program and Procedures, dated 12/17/18 (Internal Corrosion Procedures), failed to adequately stipulate the requirements of §195.555.

You must require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under §195.402(c)(3) for which they are responsible for insuring compliance.

During the inspection, a PHMSA inspector reviewed the Internal Corrosion Procedures. Section 2.1 of the Internal Corrosion Procedures stated in part: "Supervisors may be registered professional engineers, or persons recognized as corrosion specialists or cathodic protection specialist by NACE, and/or their professional activities include suitable experience in corrosion control." The internal Corrosion Procedure used the term "suitable experience" to present an alternative requirement, but the term was ambiguous and not defined.

The NOA states that Delaware Pipeline failed to prepare an adequate manual of written procedures as required by §195.402, because the term "suitable experience" was not defined in its Internal Corrosion Procedures as it pertains to §195.555.

**PBF Response:**

Effective May 30, 2020, Delaware Pipeline has revised CV-005(B) Internal Corrosion Control Program and Procedures as well as CV-005(A) External Corrosion Control Program and Procedures with the following language to define "suitable experience":

**Technical Services and supervisory personnel responsible for insuring compliance with the Company's corrosion control procedures shall be knowledgeable of the applicable procedures, including but not limited to those for design, installation, operation and maintenance of internal and external corrosion control systems and possess suitable education and/or experience<sup>1</sup>.**

**<sup>1</sup>"Suitable education and/or experience" means:**

- a. Corrosion Specialist or Cathodic Protection Specialist as certified by NACE, or;**
- b. A minimum 5 year history of satisfactory on-the-job performance in the field of corrosion control on pipelines and storage tanks (if applicable), or;**
- c. A minimum 3 year history of satisfactory on-the-job performance in the field of corrosion control on pipelines and storage tanks (if applicable) and a 2 year degree in the field of corrosion control from an accredited college or university, or;**
- d. A minimum 3 year history of satisfactory on-the-job performance in the field of corrosion control on pipelines and storage tanks (if applicable) and a 4-year BS degree in a technical field.**
- e. Corrosion supervisors not meeting any of the above criterion, but successfully completes the Company's "Initial Supervisor Level Corrosion Control Training"**
- f. If the Company does not have personnel meeting the above criterion, it may utilize the services of a contractor or consultant meeting the above criterion a thru d.**

**Note: All Company Corrosion Supervisors will be required to successfully complete the Company's "Refresher Supervisor Level Corrosion Control Training" bi-annually.**

Attached are the revised CV-005(B) Internal Corrosion Control Program and Procedures as well as the CV-005(A) External Corrosion Control Program and Procedures".

If you have any questions or comments, please contact Thomas McLane at 281-602-4224 or by e-mail at [Thomas.mclane@pbfenergy.com](mailto:Thomas.mclane@pbfenergy.com).

Sincerely,



Thomas J. McLane  
Director, PBF Logistics Regulatory Compliance

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