



**Paulsboro Natural Gas Pipeline
Company LLC**

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February 5, 2021

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

RE: Response to Notice of Amendment, Docket: CPF 1-2021-001 NOA

Dear Mr. Burrough,

Paulsboro Natural Gas Pipeline Company, LLC (PNGPC) received a Notice of Amendment, Docket CPF 1-2021-001 NOA dated January 15, 2021, from an audit performed from February 27, 2020 to October 2, 2020.

The Notice of Amendment states that PNGPC's Operations, Maintenance and Emergency Response Manual did not adequately address, in its procedures, the method for ensuring compliance with §192.625, "Odorization of Gas". After further review with PHMSA inspectors Steve Giarrantano and Mark Sacchetti on February 2, 2021, attached is the revised procedure that now meets the requirements of 49 CFR §192.625(f) and assures PNGPC is properly monitoring and documenting the presents of odorant in the natural gas that enters its pipeline system.

Therefore, as defined in the *Response Options for Pipeline Operators in Enforcement Proceedings* under 49 CFR Part §190.208, section II, *Procedures for Responding to a Notice of Amendment*, PNGPC is not contesting the Notice and has revised its procedures to meet the requirement of §192.605 and §192.625(f).

Should you have any questions concerning this response, please don't hesitate to contact me at 281-602-4224 or email at Thomas.mclane@pbfenergy.com.

Respectfully,

A handwritten signature in blue ink, appearing to read "Thomas J. McLane".

Thomas J. McLane
Director, Regulatory Compliance

Attachment: OM&E Procedure P-192.625

Cc: Steve Giarrantano, PHMSA
Mark Sacchetti, PHMSA
Jim Fedena, PBF Holding Co. Sr. Vice President, Logistics