



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 21, 2007

Mr David A. Justin
Vice President, Operations
Sunoco Pipeline, L.P
525 Fritztown Road
Sinking Spring, PA 19608

CPF 4-2007-5033W

Dear Mr Justin:

Between February 21, 2006 and December 15, 2006 Sunoco Pipeline, L.P. (Sunoco) experienced nineteen (19) separate accidents in Texas and Oklahoma requiring the submittal of reports within 30 days. The referenced accident reports were instead submitted from 1 day to well over 1 year late. The corresponding spill volumes ranged from 5 gallons to 200 barrels.

Because of these findings, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The issue referenced and the probable violation is:

1. **§195.54 Accident reports.**
 - (a) **Each operator that experiences an accident that is required to be reported under §195.50 shall as soon as practicable, but not later than 30 days after discovery of the accident, prepare and file an accident report on DOT Form 7000-1, or a facsimile.**

Sunoco filed the following nineteen (19) accident reports outside the required 30-day reporting period. Sunoco should revise its procedures to ensure that accident reports are filed in accordance with regulatory requirements.

Report No	Accident Date	Report Date	Volume	
			Barrels	Gallons
20060106	2/21/2006	4/4/2006	75	
20060107	2/24/2006	4/4/2006	10	
20060108	2/24/2006	4/4/2006	35	
20060149	4/29/2006	5/30/2006	63	
20060160	4/25/2006	6/8/2006	15	
20060201	6/15/2006	7/18/2006	200	
20070093	8/13/2006	4/5/2007	2	
20070094	7/17/2006	4/5/2007		20
20070116	8/21/2006	2/5/2007	100	
20070117	5/31/2006	2/5/2007	15	
20070118	5/31/2006	2/5/2007	10	
20070134	12/15/2006	5/9/2007	4	
20070138	12/04/2006	5/15/2007	3	
20070192	3/20/2006	7/11/2007		20
20070193	3/21/2006	7/11/2007		5
20070194	4/3/2006	7/11/2007		20
20070195	5/1/2006	7/11/2007	15	
20070196	5/4/2006	7/11/2007	3	
20070197	9/6/2006	7/11/2007		20

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Sunoco being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2007-5033W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b)

Sincerely,

A handwritten signature in black ink, appearing to read "R M Seeley". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

R M. Seeley
Director, Southwest Region
Pipeline and Hazardous
Materials Safety Administration