



May 27, 2020

CERTIFIED MAIL

Mr. Robert Burrough
Director, PHMSA Eastern Region
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CPF 1-2020-5008M

Dear Mr. Burrough:

This letter is in response to the Notice of Amendment received by Kiantone Pipeline Corporation regarding the following items:

- The *Operations, Maintenance, & Emergency Response Procedures Manual*, specifically Chapter 15.5 (Above Grade Facilities), did not contain any criteria for classifying atmospheric corrosion, nor did it specify timeframes for repair of conditions requiring remediation.
- The *Operations, Maintenance, & Emergency Response Procedures Manual* did not include or specify a procedure on how to conduct calibration testing for pressure switches (Chapter 14).

The Notice of Amendment specifically referenced §195.581, 195.583, and 195.585, in stating that the "procedures were inadequate regarding the classification of atmospheric corrosion conditions, and timeframes to remediate issues found during these inspections...". Although Kiantone believes these regulations do not provide any requirement for classifying atmospheric corrosion conditions, or for specifying timeframes to remediate issues, in the spirit of improving pipeline safety, Kiantone has updated Chapter 15.5 (Above Grade Facilities) to include classification of atmospheric corrosion conditions, along with timeframes to remediate conditions/issues found during inspections. The amended version of Chapter 15.5 (2020-0515) is attached to this letter.

The Notice of Amendment also stated that Kiantone's manual failed to include procedures for conducting calibration testing on overpressure protection switches. In response to this finding, Kiantone has amended the manual to include Procedure 14.1.1 "Calibrating Pressure Switches", along with Form 14.1.2 "Pressure Switch Calibration Record" (version 2020-0515). Both of these documents are also attached this letter.

Kiantone hopes that the attached amendments satisfy the Notice of Amendment. If you have any questions or comments, feel free to contact me directly at the above number.

Very truly yours,

UNITED REFINING COMPANY

Jeremy T. Archer
Manager of Pipeline and Terminal Compliance

Att.

cc. David Wortman, V.P. Supply & Transportation