



January 16, 2023

Mr. Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Safety Materials Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: CPF No. 3-2022-064-NOA
Response from Gulf South Pipeline Company, LLC ("Gulf South") to
Pipeline and Hazardous Materials Safety Administration ("PHMSA")
Notice of Amendment ("NOA")

Dear Mr. Ochs:

On November 17, 2022, PHMSA issued an NOA to Gulf South following an inspection of the Integrity Management Plan ("IMP") of Boardwalk Pipelines, LP ("Boardwalk"). Gulf South is a subsidiary of Boardwalk and, along with other Boardwalk-owned pipelines, is subject to the provisions of the Boardwalk IMP.

Pursuant to 49 C.F.R. § 190.206, Gulf South is enclosing revised versions of Chapter 9 and Chapter 12 of the Boardwalk IMP with modifications shown in redline and strike-out. Boardwalk respectfully requests that PHMSA find that the revisions address the concerns identified in the NOA.

Below, is an overview of the revisions to Chapter 9 and Chapter 12 of the Boardwalk IMP.

The Boardwalk IMP is comprised of multiple chapters intended to be interpreted as a single comprehensive procedure. The following chapters contain procedures in the IMP that address the incorporation of new information, including information gained through experience, to continuously improve implementation of the IMP:

- i. IMP Chapter 9: *Performance Plan* requires the identification and tracking of metrics to provide for the introduction of new information from multiple sources.
- ii. IMP Chapter 12: *Quality Control Plan* Section 3.10 provides for incorporating new information obtained through PHMSA audits.
- iii. IMP Chapter 14: *Management of Change* Section 4, requires that the tracking of new information to drive changes and improvements to the IMP.

With respect to defining specific benchmarks used to verify program improvement, Boardwalk has revised Chapter 9: *Performance Plan* to reflect the annual review of PHMSA incident data to learn from industry incident trends and to measure the effectiveness of Boardwalk's IMP.

In addition, Boardwalk has revised Chapter 12 to refer to Chapter 9 regarding the responsibility for documenting and implementing IMP improvements.

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If you have any questions concerning the information contained in this response, please do not hesitate to contact me, Darral Ward, Manager, Pipeline Safety or Tina Baker, Manager, Compliance Services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tony G. Rizk", with a stylized flourish at the end.

Tony G. Rizk
Vice President, Technical Services

cc: Mr. Darral Ward, Manager, Pipeline Safety
Ms. Tina H. Baker, Manager, Compliance Services

Attachments: *Attachment A: Performance Plan*
Attachment B: Quality Control