



Suburban Propane
240 Route 10 West
Whippany, NJ 07981

February 12, 2024

Gregory Alan Ochs
Director, Central Region, OPS
Pipeline and Hazardous Materials
Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: Notice of Amendment
Letter dated January 11, 2024 - Response
CPF 3-2024-006-NOA

VIA ELECTRONIC MAIL TO: Gregory.Ochs@dot.gov; d.donaldson.ctr@dot.gov; nkauj.her.ctr@dot.gov; ryan.mcclure@dot.gov; Mia.Petrucci@dot.gov

Dear Mr. Ochs:

Included below are responses to your identified inadequacies stated in the January 11, 2024 Notice of Amendment letter:

1. § 192.605 Procedural manual for operations, maintenance, and emergencies

The Suburban Propane, L.P. Operations and Maintenance Manual, last revised December 14, 2022, is inadequate because it does not require that leakage surveys be conducted with calibrated leak detector equipment outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months as required by § 192.723(b)(2).

As described in our revised PHMSA manual dated 12/19/2023 (on pages 29 and 30, and as indicated on the System Leakage Survey Report), a calibrated leak detector equipment and calibration date is now specified for leakage surveys. See attached for the referenced pages from our PHMSA manual.

2. **§ 192.613 Continuing surveillance.**

The Suburban Propane, L.P Operations and Maintenance Manual last revised December 14, 2022, is inadequate because it does not to require documentation of a program to recondition, phase out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but for which no immediate hazard exists.

Our revised Patrolling & Continuing Surveillance form (dated 12/19/2023) now states additional documentation for unsatisfactory conditions. An additional question was added to the form to document the potential presence of other factors or unusual operating or maintenance conditions (see attached).

3. **§ 192.1007 What are the required elements of an integrity management plan?**

Suburban Propane did not develop a written integrity management plan as specified in § 192.1007. Suburban's integrity management program incorrectly utilized § 192.1015 for a small liquefied propane gas (LPG) operator. The Suburban Terlingua system has 121 customers from a single source which exceeds the 100-customer-count specified by § 192.1001. Therefore, Suburban cannot be considered a small LPG operator.

Our revised PHMSA manual dated 12/19/2023 includes an additional section for Integrity Management (DIMP) to include systems with 100 or more customers (see attached). The Terlingua ranked list of threats is attached and incorporates the process stated in attached pages of the revised 2023 DIMP.

Please contact me at 802-318-6729 or dcamaiani@suburbanpropane.com if you have any questions or require any additional information.

Thank you,

/s/ Diana Camaiani

Manager – Pipeline Safety