

**NOTICE OF AMENDMENT**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**Mr. John Nyce  
Vice President  
Sun Pipe Line Company  
10 Penn Center  
1801 Market St.  
Philadelphia, PA 19103-1699**

**CPF No. 17504M**

**Dear Mr. Nyce:**

**On April 29-30, 1996, and May 15, 1997, a representative of the Eastern Region, Office of Pipeline Safety, (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of the Sun Interrefinery Pipeline System records at Marcus Hook, PA, and Paulsboro, New Jersey.**

**As a result of a review of your operating and maintenance manuals, the requirements for which are set forth in Section 195.402(d), the following inadequate procedures were noted:**

**Section 195.402(d)(ii) requires that your operations and maintenance written procedures include instructions to provide safety when responding, investigating and correcting the cause of an increase or decrease in pressure or flow rate outside normal operating limits.**

**Section 195.402(d)(3) requires that your operations and maintenance written procedures include instructions to correct for variations from normal operation of pressure flow equipment and controls.**

**Section 195.402(d)(4) requires that responsible operator personnel are notified when notice of an abnormal operation is received.**

**Your Interrefinery Pipeline System Procedural Manual, which is specifically applied to this pipeline, is inadequate in that it does not take into consideration the recording, evaluation and supervisory notification required as related to the item listed above. We**

**propose that your procedures be amended to reflect the items shown above.**

**As provided in 49C.F.R. § 190.237, this notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. § 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49C.F.R. § 190.237. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receipt of this notice.**

**Sincerely,**

**William H. Gute  
Director, Eastern Region  
Office of Pipeline Safety**

**BCOY/cb/DPS-24/366-4580/6-10-97**

**FILE: Sun Amendment CPF 17504M**

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**DPS-24, NJDO, DPS-22.1, All Regions, W.Gute, P.Nguyen, B.Coy**