



Sunoco Logistics



Sunoco Logistics Partners L.P.

Twin Oaks Terminal
4041 Market St
Aston, PA 19014-3197

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Attn: Mr. Byron Coy, Director, Eastern Region
820 Bear Tavern Road, Suite 103
Trenton, NJ, 08628

October 31, 2014

RE: CPF-1-2014-5004M - Notice of Amendment (NOA)
2013 System Inspection – Operating and Maintenance Procedures / Public Awareness Program

Dear Mr. Coy,
Sunoco Pipeline L.P. (SPLP) is in receipt of your letter dated October 2, 2014, regarding the above referenced inspection conducted by PHMSA's Eastern Region.

SPLP wishes to respond to the Notice of Amendment as follows:

- Item 1 – 195.440 Public Awareness – accept finding – revision was made prior to NOA.
- Item 2 – 195.402 as related to 195.573 – request modification in part – explanation submitted.
- Item 3 – 195.402(a) as related to 195.571 – request modification in part – explanation submitted.
- Item 4 – 195.402(a) as related to 195.432 – accept finding – revision was made prior to NOA

SPLP response corresponding to CPF-1-2014-5004M Items 1, 2, 3 and 4 with an explanation of each item included on Page 2.

SPLP requests that, upon review, PHMSA will agree these items are satisfactorily addressed with the revisions and explanations included with this response.

Should you have any questions or require further information, please contact Albert Kravatz of our Twin Oaks Office at 610-859-5755 or Ed Patterson of our Icedale Office at 610-942-1924.

Respectfully Submitted,

David Chalson
Senior Vice President, Operations
Sunoco Pipeline L.P.

cc: Kevin Dunleavy, Chief Counsel, Sunoco, Inc.
Todd Stamm, Sr. Director, Pipeline Operations, Sunoco Pipeline, LP
Charles Stewart, Director, East Product Pipeline Systems, Sunoco Pipeline LP
Kirk Greenlee, Director, NGL Pipeline Systems, Sunoco Pipeline LP
Leif Jensen, Sr. Director, Asset Integrity, Sunoco Pipeline LP
Carl Allebach, Sr. Manager, Corrosion Field Services, Sunoco Pipeline LP
John Pachuta, Sr. Manager, Tank Integrity, Sunoco Pipeline LP
Todd Nardozi, Manager, DOT Compliance, Sunoco Pipeline LP
Kevin Docherty, Manager, Public Awareness. Sunoco Pipeline LP

Item 1: 195.440 Public Awareness

PHMSA Finding:

"Sunoco's written continuing public education program, Public Awareness and Education Program, was inadequate because it failed to follow the general program recommendations in Section 4 of API RP 1162 and assess the unique attributes and characteristics of the its pipeline and facilities. Specifically, Sunoco did not have a detailed written process for providing programs in both English and in other languages commonly used by a significant concentration of non-English speaking population along the pipeline."

"Sunoco's Public Awareness Program did not have a documented process for providing programs in language(s) spoken by a significant portion of the intended audience. Section 6 of Sunoco's procedure stated: "Communication materials are provided in the language(s) spoken by a significant portion of the intended audience." There was no information on what data will be evaluated to determine which language the program should be in, the frequency of evaluation, and defining what the operator deems as "significant portion"."

SPLP response:

SPLP Manager, Public Awareness took steps to address items in API RP 1162 Section 4 with revisions made to the SPLP Public Awareness Program in 10/30/2013 to add a written description of the process used to determine the language spoken by a significant portion of the intended audience and again in 3/31/2014 to add the percentage of the population that SPLP considers a "significant portion."

The current SPLP Public Awareness Program Sub-Section 6.1 dated 3/31/2014 is included below to address Item 1.

Subsection 6.1 – Determine Content for Each Message Type

Communication materials are provided in the language(s) spoken by a significant number (more than 15%) and concentration of the intended audience as determined by aggregated data from the most recent data available from the United States Census Bureau as compiled and analyzed by the Modern Language Association ([http://www.mla.org/resources/map main](http://www.mla.org/resources/map_main).) Analysis of the MLA data for each county included in the PAP will be used to determine what language, if any in addition to English, is the most frequently spoken language in all of the counties in which SPLP operates. The analysis of the language assessment will be maintained as part of the PAP documentation.

Supporting Documentation Example of MLA-Based Language Analysis

An example of the MLS data Analysis completed by the Manager, Public Awareness showing the New Jersey counties in which SPLP operates is included as **Attachment 1**. All counties in which SPLP operates were reviewed and analyzed for most frequently spoken language in 2013.

Item 2: 195.402 as related to 195.573

PHMSA Finding:

"Sunoco's manual of written procedures for conducting normal operations and maintenance activities for each pipeline system was inadequate. Specifically, Sunoco's manual of written procedures for monitoring external corrosion was inadequate in that it did not provide enough specificity for the terms used in their corrosion control procedures.

Sunoco's procedure titled "195.573 Monitoring External Corrosion Control" issued: 6-01-02, Annual Review: 7-30-13 and Last Revised: 10-31-10, referenced the following terms:

- 1. Engineering evaluation*
- 2. Other technology*
- 3. Sound engineering practices*
- 4. Comparable technology*

Nowhere in the procedure did it provide details such as:

- 1. When is an "engineering evaluation" warranted? Who can perform it? How is it documented?*
- 2. What "other technologies" are acceptable? Who determines the need to use these technologies? Who approves the use of "other technologies"?*
- 3. What are sound engineering practices?*
- 4. What is a comparable technology?*

According to John Foltz, Sunoco Logistics Operations Supervisor, Sunoco Pipeline Limited Partnership (SPLP) considered these terms to be unambiguous, commonly understood and used throughout the industry. For this reason, SPLP did not have documentation specifically explaining the referenced terms.

SPLP Response:

SPLP maintains that the SPLP DOT 195 Maintenance Manual, Section 195.573 adequately meets the intent of the regulation. The terminology used in the context of that section follows that found within industry practices such as NACE SP-0169 of which Paragraph 10.1.1.3 is incorporated by reference in 195.573 which includes the definition of "Sound Engineering Practices". SPLP is open to include this definition noted below as defined by NACE in the SPLP Maintenance Manual if directed to do so by PHMSA.

SPLP response to specific questions posed in Item 2 are answered in **Attachment 2**.

Item 3: 195.402 as related to 195.571

PHMSA Finding:

"Sunoco's manual of written procedures for conducting normal operations and maintenance activities for each pipeline system was inadequate. Specifically, Sunoco's manual of written procedures for monitoring external corrosion was inadequate in that it did not provide enough specificity for the terms used in their corrosion control procedures.

Sunoco's procedure titled "195.571 Determination Of Adequacy Of Cathodic Protection" (Issued: 6-01-02, Annual Review: 7-30-12 and Last Revised: 10-26-10), referenced the following terms:

- 1. Alternative analysis techniques*
- 2. Alternate analysis techniques*
- 3. Other techniques*
- 4. Sound engineering practice.*

Nowhere in the procedure did it provide details such as:

- 1. For each of the three "techniques" referenced above:
 - a. Who determines the need to use these techniques?*
 - b. Who approves the use of these techniques?*
 - c. Who can apply the techniques?*
 - d. How is the use of these techniques documented?*
 - e. What "techniques" are acceptable?**
- 2. What are sound engineering practices?"*

According to John Foltz, Sunoco Logistics Operations Supervisor, Sunoco Pipeline Limited Partnership (SPLP) considered these terms to be unambiguous, commonly understood and used throughout the industry. For this reason, SPLP did not have documentation specifically explaining the referenced terms.

SPLP Response:

SPLP maintains that the SPLP DOT 195 Maintenance Manual, Section 195.571 adequately meets the intent of the regulation. Specificity related to the terms used in the context of that section follows that found within industry practices such as NACE SP-0169 of which Paragraphs 6.2 and 6.3 are incorporated by reference in 195.571

SPLP proposes revision to the SPLP DOT 195 Maintenance Manual, Section 195.571 to specify the alternative analysis techniques currently utilized, however wishes to maintain the terminology to allow future use of developmental and advanced technology that may prove to be better than that currently available.

SPLP response to specific questions posed in Item 3 are answered in **Attachment 3**.

Item 4: 195.402 as related to 195.432 Inspection of In-Service Breakout Tanks

PHMSA Finding:



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“Specifically, Sunoco did not reference the correct edition of API Standard 653. CFR §195.3 Incorporation by reference indicates that the correct reference should be API Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction" (3rd edition, December 2001, includes addendum I (September 2003), addendum 2 (November 2005), addendum 3 (February 2008), and errata (April 2008)).

Sunoco's "Maintenance Manual Subpart F Operation And Maintenance" Section 195.432 Inspection Of In-Service Breakout Tanks (Issued: 12-05-97, Annual Review: 7-30-12 and Last Revised : 10-26-11), Part 3 (iii),referenced API Standard 653, 4th Edition, April 2009.”

SPLP Response:

SPLP acknowledged the incorrect reference as part of the 2013 System Inspection and made revision to reference the specified version of API 653 in the SPLP DOT 195 Maintenance Manual revision date 7/30/2013.

Attachment 4 includes pages extracted from the SPLP DOT 195 Maintenance Manual to show that these revisions were made by directing reference from Section 195.432 Inspection of In-Service Breakout Tanks to Section 195.3 “Incorporation By Reference”.



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Attachment 1: Example of MLA-Based Language Analysis

Example of the MLS-Based Language Analysis showing New Jersey Counties is shown on the next 8 pages.



SPLP Public Awareness Program Language Analysis

Original Analysis conducted 12/3/2013

Burlington County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006–2010

	Ages 5 +	%
English	371,525	88.10%
All languages other than English combined	50,167	11.90%
Spanish	17,416	4.13%
Italian	2,643	0.63%
Other Asian languages	2,447	0.58%
Portuguese	2,415	0.57%
Other Indic languages	2,215	0.53%
German	2,037	0.48%
Korean	1,955	0.46%
Gujarathi	1,736	0.41%
Chinese	1,705	0.40%
Urdu	1,567	0.37%
Polish	1,549	0.37%
Tagalog	1,510	0.36%
French	1,482	0.35%
African languages	1,334	0.32%
French Creole	1,092	0.26%
Hindi	981	0.23%
Russian	824	0.20%
Arabic	631	0.15%
Other Indo-European languages	615	0.15%
Greek	611	0.14%
Vietnamese	517	0.12%
Other Slavic languages	467	0.11%
Serbo-Croatian	393	0.09%
Japanese	324	0.08%
Hungarian	286	0.07%
Hebrew	223	0.05%
Armenian	172	0.04%
Thai	155	0.04%
Other West Germanic languages	148	0.04%
Total:	421,692	



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SPLP Public Awareness Program Language Analysis

Original Analysis conducted 12/3/2013

Camden County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006–2010

	Ages 5 +	%
English	391,622	81.55%
All languages other than English combined	88,595	18.45%
Spanish	50,887	10.60%
Chinese	3,834	0.80%
Vietnamese	3,623	0.75%
Italian	2,890	0.60%
Tagalog	2,749	0.57%
Korean	2,664	0.55%
Other Asian languages	1,762	0.37%
Gujarathi	1,756	0.37%
Other Indic languages	1,614	0.34%
Russian	1,538	0.32%
French	1,532	0.32%
Hindi	1,484	0.31%
German	1,328	0.28%
Arabic	1,224	0.25%
African languages	1,083	0.23%
Urdu	1,030	0.21%
Polish	1,007	0.21%
Portuguese	1,006	0.21%
Hebrew	914	0.19%
Greek	837	0.17%
Other Indo-European languages	790	0.16%
French Creole	777	0.16%
Other Slavic languages	458	0.10%
Japanese	291	0.06%
Serbo-Croatian	231	0.05%
Other Pacific Island languages	198	0.04%
Other West Germanic languages	167	0.03%
Armenian	165	0.03%
Mon-Khmer, Cambodian	164	0.03%
Total:	480,217	



SPLP Public Awareness Program Language Analysis

Original Analysis conducted 12/3/2013

Essex County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

	Ages 5 +	%
English	489,792	67.42%
All languages other than English combined	236,658	32.58%
Spanish	126,821	17.46%
Portuguese	23,955	3.30%
French Creole	17,553	2.42%
African languages	10,117	1.39%
French	7,609	1.05%
Tagalog	7,088	0.98%
Chinese	6,570	0.90%
Italian	6,414	0.88%
Russian	3,458	0.48%
Other Indic languages	2,432	0.33%
Polish	2,345	0.32%
Korean	2,338	0.32%
Arabic	2,301	0.32%
Other Asian languages	2,169	0.30%
Gujarathi	2,154	0.30%
Other Indo-European languages	1,997	0.27%
Hindi	1,754	0.24%
German	1,360	0.19%
Other Slavic languages	1,352	0.19%
Hebrew	1,056	0.15%
Greek	802	0.11%
Persian	753	0.10%
Urdu	700	0.10%
Vietnamese	550	0.08%
Other Pacific Island languages	400	0.06%
Yiddish	396	0.05%
Scandinavian languages	318	0.04%
Japanese	310	0.04%
Hungarian	297	0.04%
Total:	726,450	



SPLP Public Awareness Program Language Analysis

Original Analysis conducted 12/3/2013

Gloucester County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

	Ages 5 +	%
English	245,448	91.66%
All languages other than English combined	22,342	8.34%
Spanish	8,877	3.31%
Italian	2,733	1.02%
Tagalog	1,364	0.51%
Other Asian languages	935	0.35%
German	857	0.32%
Chinese	793	0.30%
Other Indic languages	772	0.29%
Gujarathi	668	0.25%
Portuguese	625	0.23%
Greek	567	0.21%
French	562	0.21%
Polish	537	0.20%
Arabic	374	0.14%
Russian	366	0.14%
Vietnamese	356	0.13%
Korean	295	0.11%
Hindi	244	0.09%
African languages	237	0.09%
Other Slavic languages	167	0.06%
Other Indo-European languages	153	0.06%
Japanese	143	0.05%
Hebrew	136	0.05%
Persian	113	0.04%
Other West Germanic languages	112	0.04%
Other Pacific Island languages	93	0.03%
Thai	67	0.03%
Hungarian	37	0.01%
Urdu	37	0.01%
French Creole	36	0.01%
Total:	267,790	



SPLP Public Awareness Program Language Analysis

Original Analysis conducted 12/3/2013

Mercer County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

	Ages 5 +	%
English	252,859	73.78%
All languages other than English combined	89,877	26.22%
Spanish	40,539	11.83%
Chinese	6,871	2.00%
Polish	5,022	1.47%
Other Asian languages	3,727	1.09%
Hindi	3,245	0.95%
Italian	3,050	0.89%
French Creole	2,956	0.86%
Other Indic languages	2,871	0.84%
French	2,471	0.72%
Gujarathi	2,296	0.67%
African languages	2,033	0.59%
Korean	1,851	0.54%
Russian	1,529	0.45%
Tagalog	1,361	0.40%
German	1,335	0.39%
Other Slavic languages	1,201	0.35%
Urdu	1,167	0.34%
Arabic	1,028	0.30%
Greek	879	0.26%
Portuguese	638	0.19%
Japanese	549	0.16%
Hungarian	461	0.13%
Persian	461	0.13%
Hebrew	425	0.12%
Vietnamese	399	0.12%
Other Indo-European languages	358	0.10%
Serbo-Croatian	355	0.10%
Scandinavian languages	265	0.08%
Other West Germanic languages	223	0.07%
Total:	342,736	



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SPLP Public Awareness Program Language Analysis

Original Analysis conducted 12/3/2013

Middlesex County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

	Ages 5 +	%
English	452,977	60.54%
All languages other than English combined	295,203	39.46%
Spanish	108,846	14.55%
Gujarathi	23,985	3.21%
Chinese	23,708	3.17%
Other Asian languages	20,002	2.67%
Hindi	18,809	2.51%
Other Indic languages	16,688	2.23%
Tagalog	11,209	1.50%
Polish	8,001	1.07%
Arabic	7,281	0.97%
Portuguese	7,250	0.97%
Russian	7,170	0.96%
Urdu	6,645	0.89%
Italian	5,262	0.70%
Korean	4,897	0.65%
African languages	3,544	0.47%
Other Slavic languages	2,922	0.39%
Vietnamese	2,428	0.32%
French	2,151	0.29%
German	1,971	0.26%
Other Indo-European languages	1,958	0.26%
Hebrew	1,664	0.22%
Greek	1,646	0.22%
Hungarian	1,537	0.21%
French Creole	1,026	0.14%
Japanese	983	0.13%
Other Pacific Island languages	820	0.11%
Persian	718	0.10%
Serbo-Croatian	537	0.07%
Other West Germanic languages	333	0.04%
Total:	748,180	



SPLP Public Awareness Program Language Analysis

Original Analysis conducted 12/3/2013

Somerset County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

	Ages 5 +	%
English	216,134	72.21%
All languages other than English combined	83,185	27.79%
Spanish	32,621	10.90%
Chinese	9,296	3.11%
Other Asian languages	4,738	1.58%
Hindi	4,043	1.35%
Gujarathi	3,779	1.26%
Tagalog	3,392	1.13%
Italian	2,724	0.91%
Polish	2,688	0.90%
Other Indic languages	2,209	0.74%
Portuguese	2,098	0.70%
Russian	1,529	0.51%
German	1,487	0.50%
Arabic	1,368	0.46%
Korean	1,217	0.41%
Urdu	1,210	0.40%
African languages	1,183	0.40%
French	1,104	0.37%
Greek	797	0.27%
Other Slavic languages	792	0.26%
Vietnamese	757	0.25%
Hungarian	704	0.24%
Other Indo-European languages	528	0.18%
Persian	493	0.16%
Other West Germanic languages	387	0.13%
Scandinavian languages	379	0.13%
Japanese	353	0.12%
French Creole	318	0.11%
Hebrew	211	0.07%
Other Pacific Island languages	168	0.06%
Total:	299,319	



Union County, New Jersey

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006–2010

	Ages 5 +	%
English	293,751	59.51%
All languages other than English combined	199,882	40.49%
Spanish	119,587	24.23%
Portuguese	18,889	3.83%
French Creole	9,581	1.94%
Polish	6,549	1.33%
Italian	5,748	1.16%
Tagalog	5,452	1.10%
French	4,196	0.85%
Chinese	3,948	0.80%
African languages	3,752	0.76%
Russian	2,945	0.60%
Gujarathi	2,058	0.42%
Other Slavic languages	1,955	0.40%
Arabic	1,782	0.36%
Other Asian languages	1,727	0.35%
Hindi	1,490	0.30%
German	1,449	0.29%
Greek	1,273	0.26%
Other Indo-European languages	971	0.20%
Other Indic languages	913	0.18%
Korean	882	0.18%
Vietnamese	828	0.17%
Hebrew	661	0.13%
Japanese	579	0.12%
Urdu	445	0.09%
Other Pacific Island languages	383	0.08%
Hungarian	377	0.08%
Other West Germanic languages	318	0.06%
Yiddish	291	0.06%
Serbo-Croatian	270	0.05%
Total:	493,633	



PHMSA questions appear below in **BOLD TEXT**. SPLP Explanation appears in *Italic Text*.

1. a.) When is an “engineering evaluation” warranted? b.) Who can perform an “Engineering Evaluation”? c.) How is an engineering evaluation documented?

- a. *When a deviation from the acceptable range of criteria is discovered, an engineering evaluation is warranted.*
- b. *An engineering evaluation is performed by a qualified individual, typically, a Corrosion Supervisor or Corrosion Engineer.*
- c. *An engineering Evaluation is typically documented by Notes, Documents or Data entered in the applicable location on the SPLP corrosion database.*

2. a.) What Other Technologies are acceptable? b.) Who determines the need to use these technologies”; c.) Who approves the use of “other Technologies”?

- a. *“Other Technologies” include, but are not limited to, CP coupons, ER probes, net CP current inline inspection tools, DC and AC voltage gradient surveys.*
- b. *The use of other technologies is determined by a qualified individual, typically, a Corrosion Supervisor or Corrosion Engineer.*
- c. *The use of other technologies is approved by a qualified individual, typically, a Corrosion Supervisor or Corrosion Engineer.*

3. What are “Sound Engineering Practices”?

As used in the SPLP maintenance Manual section 195.573, the definition of “sound engineering practices” is used in context with the Nace Standard SP-0169, 2007,

Definitions:

“Sound Engineering Practices” Reasoning exhibited or based on thorough knowledge and experience, logically valid and having technically correct premises that demonstrate good judgment or sense in the application of science.

4. What is “comparable technology”?

Other technology / comparable technology include, but are not limited to, CP coupons, ER probes, net CP current inline inspection tools, DC and AC voltage gradient surveys.

Attachment 3: 195.402 as related to 195.571



PHMSA questions appear below in **BOLD TEXT**. SPLP Explanation appears in *Italic Text*.

1. For each of the three "techniques" referenced above:

a. Who determines the need to use these techniques?

Corrosion Engineer, Corrosion Supervisor, Corrosion Manager

b. Who approves the use of these techniques?

Corrosion Engineer or Corrosion Manager

c. Who can apply the techniques?

Corrosion Technician, Corrosion Supervisor, Corrosion Engineer

d. How is the use of these techniques documented?

Documentation is by entry to the Corrosion Database.

e. What "techniques" are acceptable?

SPLP proposes that SPLP DOT 195 Maintenance Manual part 195.571 Paragraph 5 should be revised as noted below:

5. Alternate analysis techniques, such as, but not limited to, inline inspection data, corrosion coupons, historical corrosion rates, measured corrosion rates, net protective current measurements, soil resistivity, leak history, historical performance of corrosion control measures and other techniques, based on sound engineering practice, may be used in conjunction with or in lieu of the above stated cathodic protection analysis criteria to determine whether adequate cathodic protection levels have been achieved.

The alternate analysis tools may be used in cases where specific test procedures required to meet the stated cathodic protection criteria are not feasible and may generate erroneous data and promote unwarranted cathodic protection current levels. Conditions such as this may exist in common right-of-ways where a number of isolated, cathodically protected pipelines exist, in areas where static and transit related stray current sources exist and on long continuous ineffectively coated lines where the corrosion currents may introduce errors for which accurate compensation may not be possible.

2. What are sound engineering practices?"

As used in the SPLP maintenance Manual section 195.573, the definition of "sound engineering practices" is used in context with the Nace Standard SP-0169, 2007,

Definitions:

"Sound Engineering Practices" Reasoning exhibited or based on thorough knowledge and experience, logically valid and having technically correct premises that demonstrate good judgment or sense in the application of science.



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Pages extracted from the SPLP DOT 195 Maintenance Manual showing revisions to “Section 195.3 Incorporation By Reference” and “Section 195.432 Inspection of In Service Breakout Tanks” are shown on the next 2 pages.

SPLP submits these revisions to satisfy CPF-1-2014-5004M Item 4.



Document & Edition Incorporated By Reference	PART 195 Subpart – Incorporated Document reference: ‘In-whole’ or ‘In-part’
<p>API Standard 653 “Tank Inspection, Repair, Alteration and Reconstruction” (3rd Edition, 2001, includes addendum 1 (Sept. 2003), addendum 2 (Nov. 2005), addendum 3 (Feb. 2008, and errata (April 2008)</p> <p>API RP 2003 “Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents” (7th Edition, Jan. 2008)</p>	<p>195.205(b)(1) – In-Whole 195.432(b) – In-whole</p> <p>195.405(a) – In-Whole</p>
<p>API Publication 2026 “Safe Access/Egress Involving Floating Roofs of Storage Tanks in Petroleum Service” (2nd Edition, April 1998, reaffirmed June 2006)</p>	<p>195.405(b) – In-Whole</p>
<p>ASME/ANSI B31.8-2007 “Gas Transmission and Distribution Systems” (Nov. 30, 2007)</p>	<p>195.5(a)(1)(i) – <u>Appendix N only</u> 195.406(a)(1)(i) – <u>Appendix N, Section N5.0 only</u></p>
<p>ASME/ANSI B31G-1991 (Reaffirmed 2004) “Manual for Determining the Remaining Strength of Corroded Pipelines”</p>	<p>195.452(h)(4)(i)(B); 195.452(h)(4)(iii)(D) – In-Whole</p>
<p>API RP 2350 “Overfill Protection for Storage Tanks In Petroleum Facilities” (3rd Edition, Jan. 2005)</p> <p>API RP 1165 “Recommended Practice for Pipeline SCADA Displays” (1st Edition January 2007).</p> <p>API RP 1168 “Pipeline Control Room Management” (1st Edition September 2008)</p>	<p>195.428(c) – In-Whole</p> <p>195.446(c)(1)</p> <p>195.446(c)(5), (f)(1)</p>
<p>NACE SP0169-2007, Standard Practice, “Control of External Corrosion on Underground or Submerged Metallic Piping Systems” (reaffirmed March 15, 2007)</p>	<p>195.571 – <u>paragraphs 6.2 and 6.3 only</u> 195.573(a)(2) – <u>paragraph 10.1.1.3 only</u></p>
<p>NACE SP0502-2008, Standard Practice, “Pipeline External Corrosion Direct Assessment Methodology” (reaffirmed March 20, 2008)</p>	<p>195.588 – <u>In-part</u></p>



<i>Issued: 12-05-97</i>	SUBPART F: Operation and Maintenance
<i>Annual Review: 7-30-13</i>	
<i>Last Revised: 7-30-13</i>	SECTION 195.432. Inspection of In-Service Breakout Tanks

195.432 INSPECTION OF IN-SERVICE BREAKOUT TANKS

Purpose / Objective

To provide for the inspection of in-service atmospheric and low-pressure steel aboveground breakout tanks to ensure they are in condition to provide safe and reliable continued service in accordance with the current Part 195 incorporated by reference edition of API Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction". See section 195.3 of this Maintenance Manual to determine the current version.

Subject Components

All aboveground break out tanks as defined under DOT 195.2 (Definitions). See Notes or Remarks this section.

Documentation

1. [Sunoco Logistics Monthly Tank Inspection Report](#) (Sun-42446-A). The retention period is until the next 5-year in-service inspection but no less than current plus 2 years, whichever is longer.
2. [Sunoco Comprehensive In-Service Tank Inspection Report](#) (Sun-42445.1) or the equivalent In-Service Tank Inspection Report as provided by the authorized inspection company. The retention period is until the next 20-year out-of-service inspection but not less than current plus 5 years, whichever is longer.
3. [Sunoco Comprehensive Out-of-Service Tank Inspection Report](#) (Sun-42445.2) or the equivalent Out-of-Service Tank Inspection Report as provided by the authorized inspection company. The retention period shall include all out-of-service tank inspection reports for the life of the tank.
4. [Sunoco Tank Maintenance Report](#) (Sun-42445.3). The retention period is the same as the associated inspection report.