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September 14, 2010

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W, Dakota Ave., Suite 110
Lakewood, CO 80228

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FURNACE PLACE

RE: **Chevron Pipe Line Company**
Notice of Amendment – CPF 5-2010-5023M

Dear Mr. Hoidal,

Pursuant to the captioned US DOT PHMSA Notice of Amendment CPF 5-2010-5023M, received August 30, 2010, Chevron Pipe Line Company (CPL) respectfully submits the attached revised written procedure to address the inadequacies identified in the Notice of Amendment.

CPL is not contesting the concerns raised by PHMSA and has revised its procedures and process accordingly to address the concerns.

NOA Issue #1: Chevron Pipe Line Company (CPL) O&M manual for the Pasco Pipeline System has inadequate procedures for properly implementing Subpart H, 195.583. The O&M procedures include general atmospheric corrosion inspection methods, but there are no specific procedures to inspect the above ground piping under thermal insulation (provers) at either the Fairchild or Spokane Delivery Stations. Furthermore, there are no records to show the provers are being inspected at least once every three (3) years.

CPL Response to NOA Issue #1

CPL has modified its procedures (see attachment) to include inspection of piping under thermal insulation to inspect for external corrosion. CPL has updated our maintenance inspection program SAP-PM to include Fairchild and Spokane Delivery Stations.

Thank you for your consideration of CPL's response to the Notice of Amendment. If you have any questions regarding these responses, please contact Gary Saenz at (713) 432-3332.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Saenz", written over a horizontal line.

PHMSA Mr. Chris Hoidal
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Electronic Transmittal

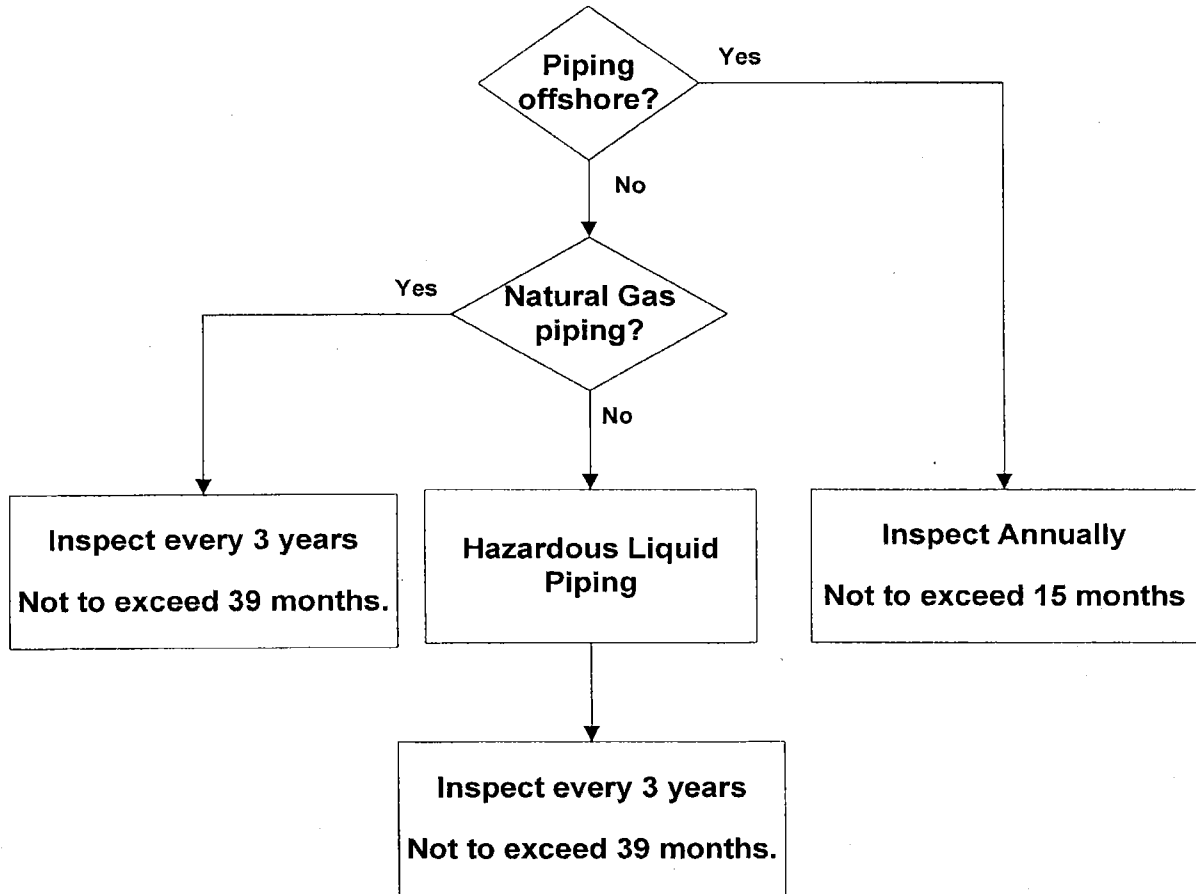
cc: J.M. Barnum
K.S. Jones
B.A. Tucker
T.J. Martin
D.E. Rankin

- 5.2.9 After the repairs have been completed, re-inspect the repaired area to ensure the repairs were effective. Repeatedly inspect and repair defect areas until no defects are detected. When inspecting repaired areas, it is not necessary to re-inspect areas that passed the previous inspection.
- 5.2.10 The person performing the inspection completes a written log of the inspection. This log must include the following:
- a) Date of the inspection
 - b) Time of the inspection
 - c) Equipment used
 - d) Voltage setting
 - e) Location of the inspection
 - f) Coating type
 - g) Results of inspection
 - h) Repairs and corrections made
 - i) Re-inspected section results
- 5.2.11 The inspection log is given to the person overseeing the pipe installation and is filed in the construction file or engineering project file for the pipeline. The inspection log must be retained for the life of the pipeline.

5.3 Atmospheric Coating Inspection

- 5.3.1 Schedule atmospheric coating inspections in SAP/PM as indicated in figure 503.2: Atmospheric Coating Inspection Requirements of this procedure.

FIGURE 503.2: Atmospheric Coating Inspection Requirements



****Use HES-114 Inspection Form (Appendix A, B or C) to document Atmospheric Coating Inspection.**

5.3.2 The following structures must be included in atmospheric coating inspections:

- Vaults
- Aboveground manifolds, including third-party connections
- Pump-station piping and terminal piping (DOT jurisdictional piping)
- Piping at Soil-to-Air interfaces
- Under thermal insulation

- 5.3.3 The following information must be noted during the inspection and entered into the appropriate form (HES-114 Appendix A, B or C):
- a) For any items that require repair, provide a brief description in the comments column.
 - b) Provide the SAP/PM number created to correct the non-compliance item.
- If the inspection reveals corrosion pitting, remove the corrosion scale by a wire brush or other method. Measure the corrosion-damaged area with a pit gauge and report the pit dimensions (axial length and maximum depth) on a CPL-3 or Field Data Collection (FDC) form in accordance with MIP-103 , *Field Data Collection Procedure*.

5.3.4 (MIP-103).

The pit dimensions must be analyzed to determine if a reportable Safety-Related Condition exists (see MIP-102 , *Safety-Related Condition Reporting*).

NOTE: *The existence of corrosion pitting does not necessarily constitute a Safety Related Condition, whether general or localized.*

5.3.5 Classify any corrosion observed per the following guidelines:

- a) Surface Rust - The majority of atmospheric corrosion including minor scaling which has not penetrated beneath the surface level of the pipe metal.

NOTE: *If there are any questions regarding the type or classification of corrosion, contact the Pipeline Integrity Technologist or Corrosion Specialist for assistance or clarification.*

- b) General Corrosion - Widespread corrosion attack with uniform wall thickness. Metal reduction associated with penetration below the surface level of the pipe.
- c) Localized Corrosion - Pitting at distinct points of attack penetrating below the surface level of the pipe metal which has occurred in a small specific area or a holiday in the coating.

NOTE: *If there are any questions regarding the type or classification of corrosion, contact the Pipeline Integrity Technologist for assistance or clarification.*

WARNING: *The condition of the atmospheric coating at the air-soil interface on pipeline system components is especially critical and should be carefully inspected.*

- 5.3.6 Report atmospheric coatings requiring repair to the Field Team Leader. Immediately report to the Field Team Leader corrosion damage that may impact the maximum operating pressure of the pipeline.

NOTE: *The Field Team Leader may increase the inspection frequency of above ground piping from every three years to once per year, especially in historically corrosive atmospheres.*

Additionally, it is recommended after 12 months from the time of the repair to check the integrity of newly repaired coatings and adjust the inspection interval accordingly, based on visual observations.