

**POST INSPECTION MEMORANDUM**

**Inspector:** Joe Subsits/WUTC  
**Reviewed:** D. Lykken/WUTC  
**Peer Reviewed:** \_\_\_\_\_  
**Follow-Up Enforcement:** No Violation  
**PCP\* PCO\* NOA WL LOC**  
**Director Approval\*** \_\_\_\_\_

**Date:** 6/21/2010

**Operator Inspected:** Chevron Pipeline Company    **OPID:** 2731    **Region:** Western

**Unit Address:** 4800 Fournace Place  
Bellaire, TX 77401-2324

**Unit Inspected:** Chevron Pipeline Company    **Unit ID:** 2731

**Unit Type:** Headquarters

**Inspection Type:** Team O&M

**Record Location:** Houston

**Inspection Dates:** 6/7/2010-6/10/2010

**AFOD:** 6

**SMART Activity Number:**

**Operator Contact:** Gary Saenz, Senior Pipeline Safety Specialist

**Phone:** (713) 432-3332    **Fax:** (713) 432-3477    **Emergency:** (281) 450-5523

**Unit Description:** N/A

**Facilities Inspected:** O&M Procedures

**Persons Interviewed:** Gary Saenz, Senior Pipeline Safety Specialist

**Probable Violations/Concerns:**

**Potential NOA issues are:**

1. Include 49 CFR 195.308 pressure testing of tie-in welds.
2. Include 49 CFR 195.402(e)(8) procedures to determine extent of HVL vapor clouds
3. Revise requirement pertaining to 49 CFR 195.230(a) to require removal (not repair) of welds with cracks over 8% of weld length.
4. Include requirements for 49 CFR 195.264 for breakout tank impoundments.
5. Include requirement to address 49 CFR 195.307 for hydrostatic testing of API 650 tanks.
6. Include appropriate records for hydrostatic testing of tanks as identified in 49 CFR 195.310.

**Follow up on the history of prior offenses that are still open:**

<b>Prior Offenses (for the past 5 years)</b>		
<b>CPF #</b>	<b>What type of open enforcement action(s)?</b>	<b>Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)</b>

**Recommendations:**

Issue NOA consistent with team recommendation.

**Comments:**

A team O&M inspection was conducted on Chevron's O&M Manual. Breakout tank procedures were also reviewed. Team members included Jeff Stahoviak (lead), PHMSA Western Region, Joe Subsits (UTC WA), Dallas Rea, PHMSA Southern Region and Jim Arnold, PHMSA Southwest Region. Several Manual modifications were noted and identified above.

**Attachments:** N/A