POST INSPECTION MEMORANDUM

Inspector: Joe Subsits UTC
Reviewed: David Lykken UTC
Reviewed: Terry Larson / PHMSA WR
Redone/ redo: Tom Finch 9/29/2009
Follow-Up Enforcement: NOA
Director Approval* 09/16/2009 by CH

Date: 9/2/2009

Operator Inspected: **OPID:** 2731 **Region:** Western
Chevron Texaco Pipeline Company
4800 Fournace Place
Bellaire, TX 77401-2324

Unit Address:
2900 Sacajawea Park Road
Pasco, WA 99301-3404

Unit Inspected: WA-UTC-Pasco Pipeline System **Unit ID:** 5145 **Unit Type:** Hazardous Liquid
Inspection Type: Standard.
Record Location: Pasco, WA
Inspection Dates: August 17, 2009 –August 21, 2009
AFOD: 5
SMART Activity Number: 123876

Operator Contact: Gary Saenz
Phone: (713) 432-3206 **Fax:** (281) 596-3626 **Emergency:** (800) 762-3404

Unit Description:
The pipeline system enters the Washington State from Salt Lake City, Utah at the Washington/Oregon border in Walla Walla County at approximately mile post (MP) 549 and extends north to Pasco Terminal at MP 569.02 in Franklin County. This pipeline provides refined products which arrive at the Pasco Terminal via a 6-inch pipeline from Oregon. A second parallel pipeline from Oregon is idle and consists of a 6-inch pipeline between the border to Burbank at MP 568.28 and an 8-inch pipeline between Burbank and the Pasco Terminal. The Pasco Terminal is equipped with three products transfer pumps connected to an 8-inch pipeline to the Spokane Terminal at MP 705. The pipelines were built between 1956 and 1959.

Facilities Inspected:
This Chevron inspection consisted of a records review at Chevron's Pasco office. The field inspection was performed at the Pasco Terminal, Spokane Delivery Station, Fairchild Delivery station, the Spokane River Span, various valve stations, cathodic protection test stations, rectifiers, and the right of way.

Persons Interviewed:

Gary Saenz Team Leader-Health, Environment and Safety DOT Pipeline Safety
Fujio Pele CP Technician

Probable Violations/Concerns:

Provers at the Fairchild and Spokane delivery stations are insulated. The O &M Manual includes atmospheric corrosion inspection under thermal insulation but there are no procedures. Also, there is no indication that atmospheric surveys included a check for corrosion under insulation on the provers within the required frequency of at least once every three years.

Follow up on the history of prior offenses that are still open: N/A

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

Recommendations:
The PHMSA Western Region to Issue Notice of Amendment as a probable violation for Chevron to include inspection procedures for atmospheric corrosion inspection under thermal insulation added to O&M manual 195.402(a) and 195.583.
Maintain regular inspection interval frequency.
Recommend scheduling O&M review in 2010. Last team review performed May 2005.

Comments:
The operator used the 850 mV on criteria to determine compliance with NACE criteria. They stated that IR drop is considered since ILI data and exposed pipe reports have never detected corrosion. The operator intends on doing some close interval surveys during the next year and will also establish native readings for the system.

Attachments:

- Field Data Collection Form
- Form 3 Abbreviated Procedures Standard Inspection Report of a Liquid Pipeline Carrier
- Form 15 Operator Qualification Field Inspection Protocol Form
- Form 19 Hazardous Liquid IMP Field Verification Inspection