

PART A – INSPECTION IDENTIFICATION

CPF #: click here to enter	<input type="checkbox"/> Gas	Date of Inspection: 8/17/2009-8/21/2009
	<input type="checkbox"/> LNG	
<input checked="" type="checkbox"/> Hazardous Liquid		
PHMSA/State Inspector name and organization: Joe Subits WUTC		

PART B – OPERATOR INFORMATION

Pipeline operator/owner: Chevron Pipeline Company	OPID: 02731	Inspection location: Pasco system	Inspection Unit #: 5145
Company Official name, title, telephone, FAX#: J Barnum VP - Pipeline Services and Standards (O) (713) 432-6174 (F) (281) 596-3626		Mailing address of Company Official: 4800 Fournace Place Bellaire, TX 77401-2324	
Nature and size of operator's system (total miles, HCA miles, products, environmental conditions, employees): 8-inch Products line from Salt Lake City, Utah to Spokane, Washington			
Portion of system inspected (locations and facilities): Washington State portion of system inspected. This included the Spokane and Fairchild Delivery Stations.			

PART C – VIOLATION and CIVIL PENALTY INFORMATION

Note: Information shown in Part C of this Pipeline Safety Violation Report relates to probable violations, proposed compliance orders, and proposed civil penalties

VIOLATION NUMBER 1

Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii). Enter only one regulation:

195.583(b)

How did the operator violate the regulation?:

The operator did provide evidence that corrosion under insulation was checked for provers at the Fairchild and Spokane Delivery Stations.

Provide additional detail regarding the violation, including the duration and extent of the violation:

The operator was asked if they have inspected the prover pipe under insulation. The operator could assure me that it had been done. A reference was made to the prover inspection report that had been completed by an outside contractor. I asked if the report addressed this issue to show me the report. This had not been done. 49 CFR 195.583 specifies that atmospheric surveys must be done every three years.

Describe the evidence:

The operator did not produce any evidence that corrosion under insulation was checked. The bands on the prover insulation did not appear to be easily removed. Also, there were no plugs which would allow monitoring access points.

How might this violation have impacted public safety? (If an accident or release of product occurred, describe the actual impact on public safety). Was this potential/actual impact in an HCA?

Corrosion under insulation is a recognized corrosion risk as identified by API, NACE and regulatory experience. A release cause by corrosion would probably be a leak until an operator visited the unmanned station. Possible fumes from the leak could cause a flammability hazard at the facility, especially at the Spokane facility which is more enclosed.

How might this violation have impacted the environment? (If an accident or release of product occurred, describe the actual impact on the environment). Was this potential/actual impact in an HCA?

Corrosion under insulation is a recognized corrosion risk as identified by API, NACE and regulatory experience. A release cause by corrosion would probably be a leak until an operator visited the unmanned station. The area is located at the Spokane aquifer which is an HCA.

Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]:

Gary Saenz, Team leader for Health, Environment, and Safety Gary is responsible for working with Pipeline Safety inspectors and is knowledgeable with Pipeline safety compliance issues. Will Ricard is the District manager and is familiar with District maintenance and inspection activities.

Comments of person(s) interviewed regarding the violation:

Gary was asked if they have inspected the prover pipe under insulation. Nobody from Chevron could assure me that this had been done. Will referenced a prover inspection report that had been completed by an outside

contractor. I asked if the report addressed the atmospheric inspection issue, to show me the report. This had not been done.

For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the Enforcement Guidance for Liquid and Gas Transmission IM)

- Area Finding: [click here to enter](#)
- Risk Category (A-E) [click here to enter](#)

Proposed action: (check one)	<input type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input type="checkbox"/>	NOPV w/ compliance order	<input checked="" type="checkbox"/>	Other: warning letter with written response required from operator

Civil Penalty Assessment Considerations For This Violation:

<Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>

C1 — Degree of the operator's culpability:

[click here to enter](#)

C2 — Good faith in attempting to achieve compliance:

[click here to enter](#)

C3 — Additional comments applicable to civil penalty:

[click here to enter](#)