

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 18, 1998

Mr. D. P. Bozell
Vice President of Operations
Marathon Ashland Pipe Line LLC
539 South Main Street
Finlay, Ohio 45840

Dear Mr. Bozell:

CPF No: 48508C

On November 17-20, 1997, a representative of the Southwest Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code conducted pipeline safety inspections of Marathon Pipe Line Company's onshore facilities and records in the Garyville, Louisiana area.

As a result of the inspection and in keeping with pipeline safety regulations, Title 49, Code of Federal Regulations, Parts 195 and 199, we have noted some areas of concern.

1. During the field observation of the Zachary pump station, it was noted that the 36-inch diameter product line immediately downstream of the breakout tanks has developed atmospheric corrosion at the concrete pipe support assembly between the carrier pipe and the support structure.
2. During the field inspection of the Marathon's Anti-drug and Alcohol Misuse Prevention programs, it was noted that plans are inadequate.

The plans presented at the field location indicate that Marathon has decided to provide a summarized or condensed version of their plans at their field sites. Additionally, Marathon has chosen to add the DOT Drug Testing Provisions as a separate section on page 14, Drug and Alcohol Policy, Employment Practices section in the Supervisor's Manual.

It is allowable for a company to have one overall drug testing plan which includes testing in addition to, but separate from, the requirements of Parts 199 and 40. Parts 199 and 40 do not specify the format for operators' drug plans, however, operators, when combining other drug testing into the plan required by §199.7, must clearly

identify those matters relating to Parts 199 and 40 by keeping these requirements in separate sections, set apart in bold face types, underlined, or other equivalent means.

It appears that in attempting to summarize the complete Alcohol and Anti-drug plan, Marathon has excluded pertinent information that distinguishes what is company policy and what is required by the §199.7 Drug Testing and §199.202 Alcohol Testing regulations .

Marathon Pipe Line Company personnel assured us that item 1, is being evaluated but will require considerable planning and budgeting and item 2, has been forwarded to the Human Resources Department for review. Marathon's Environmental and Safety Supervisor will update OPS on the remaining items as that information becomes available.

We acknowledge your response to the areas of concern that were brought to your attention during our inspection and hope that Marathon Pipe Line Company personnel will continue to improve on the safe operation and maintenance of the pipeline system. Please refer to CPF No. 48508C in any correspondence/communication on this manner.

Sincerely,

R. M. Seeley
Regional Director, Southwest Region