



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh St. S.W.  
Washington, D.C. 20590

FEB 10 2005


Mr. Patrick Doolan  
Vice President of Operations  
Mobil Pipeline  
800 Bell Street  
Houston, Texas 77002

Re: CPF No. 1-2005-5002H

Dear Mr. Doolan:

Enclosed is an Amendment to Corrective Action Order issued by the Associate Administrator for Pipeline Safety in the above-referenced case. This Amendment revises the Corrective Action Order that was issued to Mobil Pipeline (Respondent) on February 4, 2005 by mandating a change in the pressure reduction. The February 4, 2005 Order restricted operating pressure and mandated other corrective actions on Respondent's hazardous liquids pipeline that runs from Malvern, PA to Syracuse, NY and Buffalo, NY. Following further discussions with Respondent and the submission of additional information by Respondent, this Amendment now modifies Item 2 of the Order. Service is being made by certified mail and facsimile. Your receipt of this Corrective Action Order constitutes service of that document under 49 C.F.R. § 190.5. The terms and conditions of this Amendment to Corrective Action Order are effective upon receipt.

Sincerely,

  
for James Reynolds  
Pipeline Compliance Registry  
Office of Pipeline Safety

Enclosure

cc: | John DuPre  
Operations Manager - Northern Operations  
Mobil Pipeline  
3225 Gallows Road  
Room 2134  
Fairfax, VA 22037

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED) AND TELECOPY |

DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
OFFICE OF PIPELINE SAFETY  
WASHINGTON, DC 20590

In the Matter of

Mobil Pipeline Company,

Respondent.

CPF No. 1-2005-5002H

AMENDMENT TO CORRECTIVE ACTION ORDER

Purpose and Background

On February 4, 2005, the Associate Administrator for Pipeline Safety issued a Corrective Action Order in this case finding that continued operation by Mobil Pipeline Company (Respondent or Mobil) of its Malvern to New York pipeline would be hazardous to the public, property, and the environment without corrective measures. The February 4, 2005 Order was issued as a result of the February 1, 2005 pipeline failure at the Allentown Junction, 0.5 miles from Allentown, Pennsylvania. The Order restricts the operating pressure of the pipeline to 426 psig and requires Mobil to develop and submit a protocol for mechanical and metallurgical testing of the failed pipeline sections and a plan for corrective measures for approval to the Office of Pipeline Safety (OPS). In a letter dated February 10, 2005, Respondent requested that the pressure restriction be changed from 426 psig at the Allentown Junction to 1000 psig at the Malvern Pump Station in order to start the pipeline.

Additional Information

Preliminary inspection of the failure site indicates that the most likely failure point is a valve or fitting, or is possibly related to a drain line. The initial indication is that the failure may not be pressure related, and that line pipe was not involved in this incident.

The Malvern Pump Station and Terminal is the only point at which product enters this pipeline system. The product travels 26.3 miles from the Malvern Pump Station through the Reading Junction (valve site) prior to reaching the Allentown Junction (valve site), approximately 43.1 miles downstream from the Malvern Pump Station. The upstream valve setting of the Reading Junction had all of its valves replaced after 1998. The valve settings at the Allentown Junction will be completely replaced prior to starting the pipeline.

Upon further discussions with Respondent and the receipt of additional documentation through its February 10, 2005 letter, OPS learned that Respondent's pipeline cannot be started with the Allentown Junction 426 psig pressure restriction placed in the Order, due to the topography of the area in which the pipeline is located. Furthermore, there are no pressure controls at the Allentown Junction to adequately restrict the pressure at that point to 426 psig. The closest pressure controls to the failure site are at the Malvern Pump Station. The discharge pressure at the Malvern Pump Station was approximately 1000 psig at the time of failure, which is the lowest pressure required to operate the pipeline considering the various petroleum products that it transports. Ten days prior to the incident, the discharge pressure at the Malvern Pump Station was as high as 1336 psig.

Pressure restrictions at the Malvern Pump Station will reduce pressures at all points north of the Station.

#### Determination of Necessity for Corrective Action Order and Right to Hearing

Section 60112 of Title 49, United States Code, provides for the issuance of a Corrective Action Orders (and amendments), after reasonable notice and the opportunity for a hearing, requiring corrective action, which may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement, or other action as appropriate. The basis for making the determination that a pipeline facility is hazardous, requiring corrective action, is set forth both in the above referenced statute and 49 C.F.R. § 190.233, a copy of which is enclosed.

Section 60112, and the regulations promulgated thereunder, provides for the issuance of a Corrective Action Order without prior opportunity for notice and hearing upon a finding that failure to issue the Order expeditiously will likely result in serious harm to life, property or the environment. In such cases, an opportunity for a hearing will be provided as soon as practicable after the issuance of the Order.

The cause of this failure is still unknown. In light of this fact and the above additional information, I continue to find that a pressure restriction is necessary at least until the failure analysis and the related remediation plan is completed. Therefore, I continue to find that the continued operation of the Malvern to New York pipeline without corrective measures would be hazardous to life, property and the environment. Additionally, after considering the proximity of the pipeline to populated areas and waterways, the combustible nature of the products the pipeline transports, the pressure required for transporting the material, and the ongoing investigation to determine the cause

of the failure, I find that a failure to expeditiously issue this Amendment would likely result in serious harm to life, property, or the environment.

Accordingly, this Amendment mandating immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this Amendment are effective upon receipt.

Within 10 days of receipt of this Amendment, Respondent may request a hearing, to be held as soon as practicable, by notifying the Associate Administrator for Pipeline Safety in writing, delivered personally, by mail or by telecopy at (202) 366-4566. The hearing will be held in Washington, DC on a date that is mutually convenient to OPS and Respondent.

After receiving and analyzing additional data in the course of this investigation, OPS may identify other corrective measures that need to be taken. In that event, Respondent will be notified of any additional measures required and amendment of this Order will be considered. To the extent consistent with safety, Respondent will be afforded notice and an opportunity for a hearing prior to the imposition of any additional corrective measures.

#### Required Corrective Action

Pursuant to 49 U.S.C. § 60112, I hereby amend the Order and require Respondent to immediately take the following corrective action with respect to the Malvern, PA to Syracuse, NY and Buffalo, NY segment of Respondent's Malvern to New York Pipeline system:

Item 2 is amended to read as follows:


2. Once the pipeline is restarted in accordance with Item 1, the operating discharge pressure at the Malvern Pump Station is not to exceed 1000 psig. This pressure restriction will remain in effect until written approval to increase the pressure or return the pipeline to its pre-failure operating pressure is obtained from the Director, Eastern Region, OPS.

The terms of the February 4, 2005 Corrective Action Order, as modified by this Amendment, remain in effect.

Respondent may appeal any decision of the Director to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator shall be final.

The corrective actions required by this Amendment are in addition to and do not waive any requirements that apply to the pipeline under 49 C.F.R. Part 195, including the integrity management program regulations.

Failure to comply with this Order may result in the assessment of civil penalties of not more than \$100,000 per day and in referral to the Attorney General for appropriate relief in United States District Court.

  
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Stacey Gerard  
Associate Administrator  
for Pipeline Safety

FEB 10 2005

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Date Issued