

**WARNING LETTER**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

July 7, 1998

Mr. Tim Salles  
Logistics Manager  
Mobil Oil Corporation  
3700 West 190<sup>th</sup> Street  
Torrance, California 90509-2929

**CPF No. 58007W**

Dear Mr. Salles:

On December 15-18, 1997, representatives of the Western Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an on-site pipeline safety inspection and records review of Mobil Oil Corporation (Mobil) at Adelaida and Torrance, California.

As a result of the inspection, it appears that Mobil has committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and probable violations are:

1. **§192.465 External corrosion control: Monitoring.**

**(b) Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2½ months, to insure that it is operating.**

During records review on line M-150, it was noted that the 2½ month interval requirements between each inspection of rectifiers were exceeded for the periods listed below:

<b><u>Lines:</u></b>	<b><u>From:</u></b>	<b><u>To:</u></b>	<b><u>Exceeding by:</u></b>
198-50	11/08/96	01/30/97	7 days
	09/09/94	11/28/94	4 days
	07/13/92	09/30/92	2 days
189-50	11/08/96	01/30/97	7 days
	09/09/94	11/28/94	4 days
	07/13/92	09/30/92	2 days

2. **§192.481 Atmospheric corrosion control: Monitoring.**

After meeting the requirements of §192.479 (a) and (b), each operator shall, at intervals not exceeding three years for onshore pipelines and at least once each calendar year, but with intervals not exceeding 15 months, for offshore pipelines, reevaluate each pipeline that is exposed to the atmosphere and take remedial action whenever necessary to maintain protection against atmospheric corrosion.

At the time of the inspection, there were no records available to demonstrate that atmosphere corrosion control on M-150 lines had been monitored. Mobil must inspect, evaluate, and document all pipeline segments exposed to the atmosphere every three years.

3. **§192.745 Valve maintenance: Transmission lines.**

Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15-months, but at least once each calendar year.

At the time of inspection, there were no records available on valve maintenance on M-150 lines as specified in §192.745. Mobil must inspect, evaluate, and document all valve maintenance at intervals not exceeding 15 months, but at least once each calendar year.

4. **§192.605 Procedural manual for operations, maintenance, and emergencies.**

Each operator shall include the following in its operating and maintenance plan:

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This

manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

At the time of inspection, Mobil's procedural manual was under a major revision. While the manual was reviewed during the inspection, it is not in the interest of the OPS to be overly prescriptive in obtaining compliance with the requirement of §192.605(a). Therefore, the Western Region, OPS, will review Mobil's revised manual on future inspections.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violations persist up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to assess you a civil penalty for violations numbered 1, 2, and 3. We advise you, however, that should you not correct the circumstances leading to these violations, we will take enforcement action when and if the continued violations come to our attention.

Sincerely,

Edward J. Ondak  
Director

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