

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 20, 1999

Mr. Steve Davey
Associate Engineer
Unocal Corporation
27515 Bowles Road
Kennewick, Washington 99336

CPF No. 58504W

Dear Mr. Davey:

On June 3-5, 1997, a representative of the Washington Utilities and Transportation Commission (WUTC) acting as an agent for the inspection of interstate pipelines for the Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of Title 49, United States Code, §60106(a), conducted an onsite pipeline safety inspection of your pipeline facilities and records in Kennewick, Washington.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The items inspected and the probable violations are:

1. **§195.310(b) requires a record of each test required by subpart E to contain test instrument calibration data and a description of the facility tested and the test apparatus.**

At the time of the inspection, the operator did not have pressure test records for the 6-inch pipeline that showed test instrument calibration data or records containing a description of the facility tested and the test apparatus.

2. **§195.402(a) requires each operator to prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.**

At the time of the inspection, the operator did not have sufficient written procedures for the repair of arc burns that may occur during maintenance or repair activities.

3. **§195.402(e)(2) requires procedures for a prompt and effective response to various pipeline emergencies including fire, explosion, accidental release of hazardous liquid, operational failure, and natural disasters affecting the pipeline.**

At the time of inspection, the operator did not have procedures to specifically address each type of emergency listed in §195.402(e)(2).

4. **§195.404(a) requires operators to maintain current maps and records including cathodically protected facilities.**

At the time of inspection, the operator did not have maps indicating the location of cathodic protection facilities. Maps did not indicate which pipe was cathodically protected or the location of cathodic protection insulators.

5. **§195.404(b) requires operators to maintain, for a period of three years, daily operating records that indicate any abnormal or emergency operation.**

At the time of the inspection, the operator did not have operating records to document operating conditions. The operator monitors emergency conditions through 24 hour manned control room.

6. **§195.410(a) requires operators to place and maintain line markers over buried pipelines with the name of the operator, current phone number, and other appropriate information.**

At the time of the inspection, some line markers were noted to contain the wrong company name from the previous pipeline owner.

7. **§195.414(a) requires an operator to cathodically protect each coated hazardous liquid pipeline that it operates.**

At the time of the inspection, the coated hazardous liquid pipelines in operation did not have sufficient cathodic protection. A reading taken on 6-4-97 yielded a pipe to soil potential of -.484 Volts. The company's criteria for cathodic protection is -.85 Volts.

8. **§195.416(a) requires operators to conduct tests on each underground facility to determine whether cathodic protection is adequate at intervals not exceeding 15 months, but not exceeding once each calendar year.**

§195.404(c)(3) requires each operator to keep records of each inspection and test required by subpart F to be maintained for at least 2 years or until the next inspection or test is performed whichever is longer.

At the time of the inspection, the operator had not conducted tests at intervals not exceeding 15 months, but not exceeding once each calendar year to determine whether cathodic protection is adequate as required. No records were available for 1995 or 1996.

9. **§195.416(a) requires operators to monitor casing potentials to detect the presence of shorts at intervals not exceeding 15 months, but at least once each calendar year.**

§195.404(c)(3) requires each operator to keep records of each inspection and test required by subpart F to be maintained for at least 2 years or until the next inspection or test is performed whichever is longer.

At the time of the inspection, the operator had not conducted tests to monitor casing potentials to detect the presence of shorts. No records were available for 1995 or 1996.

10. **§195.416(c) requires operators to conduct inspections on each cathodic protection rectifier at intervals not exceeding 2 ½ months, but at least six times each calendar year.**

§195.404(c)(3) requires each operator to keep records of each inspection and test required by subpart F to be maintained for at least 2 years or until the next inspection or test is performed whichever is longer.

At the time of the inspection, the operator had not conducted any rectifier inspections. Records were not available for 1994, 1995, 1996, or 1997.

11. **§195.440 requires that the operator establish a continuing educational program to enable the public, government, and persons engaged in excavation to recognize a hazardous liquid pipeline emergency and report it to the operator, fire, and police.**

At the time of the inspection, the operator had not established a continuing educational program for the public, government, and persons engaged in excavation for the recognition and reporting of a hazardous liquid pipeline emergency.

12. **§195.442(b)(2) requires that the operator have a damage prevention program and that the program provide for notification of the public in the vicinity of the pipeline and actual notification to excavators as often as needed to make them aware of the damage prevention program.**

At the time of the inspection, no notification had been done to the public and excavators to make them aware of the damage prevention program.

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 violation persists 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. We advise you, however, that should you not correct the circumstances leading to the violations, we will take enforcement action when and if the continued violations come to our attention.

You will not hear from us again with regard to the noted inspection and our subsequent action. Because of the good faith that you have exhibited up to this time, we expect that you will act to bring your pipeline and operations into compliance with the pipeline safety regulations.

Sincerely,

Edward J. Ondak
Director

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