

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 18, 1997

Mr. Bob West
Director of Operations
Ashland Pipeline, L.L.C.
P. O. Box 391
Ashland, KY 41114

CPF No. 27600C

Dear Mr. West:

On November 12 - 15, 1996, representatives of the Southern Region, Office of Pipeline Safety, inspected your pipeline facilities and reviewed all records available at Owensboro, KY. As a result, there were some areas of concern.

Please consider the following:

1. **Maps and Records**

Ashland's pipeline diagrams and data sheets do not include the MOP - maximum operating pressure.

2. **Atmospheric Corrosion**

Atmospheric corrosion ranging from light to heavy pitting was found on the piping under the clamp at Preston pump station.

3. **Tank Inspections**

Ashland's operations and maintenance procedures require monthly inspections of the seven breakout tanks (Owensboro & Lebanon). The tanks were not inspected during the month of February and one of the tanks in March for 1995. Also, there was not enough information on the tank inspection reports to the degree of maintenance and how soon the repairs would be made.

4. **Cathodic Protection**

During records and field review, the readings at Station I.D. 8721 + 85 - Hwy 627

showed an unsatisfactory level of cathodic protection for two consecutive years:

11/95 - P/S -.729; C/S -.729

10/96 - P/S -.667; C/S -.666

For acceptable level of cathodic protection, the pipe to soil potential must be $-.850\text{mv}$ IR drop free reading. We recommend to take prompt remedial action.

5. Employee Assistance Program

Ashland did not display the written employer's policy regarding the use of prohibited drugs at their manned stations as required by §199.19.

We hope you will consider these areas of concern and take action to further improve your present level of safety. If we can answer any questions or be of any help, please call (404) 562-3530.

Sincerely,

Frederick A. Joyner
Director, Southern Region
Office of Pipeline Safety

cc: Compliance Registry, OPS Headquarters
File:: Ashland Pipeline, L.L.C.