



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 21, 2008

Ms. Rebecca Roberts
President
Chevron Petrochemical Pipeline LLC
4800 Fournace Place
Houston, TX 77401

CPF 4-2008-5018W

Dear Ms. Roberts:

On June 18-22, 2007, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Evangeline Ethylene Pipeline System in Lafayette, LA.

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

1. §195.428 Overpressure safety devices and overfill protection systems

- (a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

Inspection of the overpressure protection device at the EXXON Orange Facility (#4660) exceeded the 7 ½ month requirement (08/16/05 to 04/21/06) as indicated in the operator's records.

2. §195.434 Signs.

Each operator must maintain signs visible to the public around each pumping station and breakout tank area. Each sign must contain the name of the operator and a telephone number (including area code) where the operator can be reached at all times.

Signs visible to the public were missing at the following inspected locations:

- Anchorage Station

- Atchafalaya River Valve – East
- Sabine River Crossing
- Port Neches Station

3. §195.436 Security of facilities.

Each operator shall provide protection for each pumping station and breakout tank area and other exposed facility (such as scraper traps) from vandalism and unauthorized entry.

Washouts under fencing (meant to deter vandalism and unauthorized entry) were present at the following inspected facilities:

- Jack Torres Rd. Mainline Valve
- Port Barre Pig Trap
- Oak Road Valve

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Chevron Petrochemical Pipeline LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2008-5018W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,



R. M. Seeley
Director, Southwest
Pipeline and Hazardous
Materials Safety Administration