

## LETTER OF CONCERN

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 10, 1999

Mr. Kent Powers  
Regional Terminal Facilities Manager  
Citgo Petroleum Corp.  
P.O. Box 3758  
Tulsa, Ok 74102

**CPF No. 29605C**

Dear Mr. Powers:

1. On December 1, 1999, a representative of the Southern Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities and records at Fort Lauderdale, Florida.

As a result of the inspection, a number of areas that are cause for concern were found, they are:

- 1). The Emergency Manual for this office could not be found. The Oil Pollution Act manuals were on hand but the manual require by §195.402 (a) was not.
- 2). The API- 1104 manual being used was not the current edition, it should be the 18<sup>th</sup> edition.
- 3). There was no plan covering the Alcohol part of §199, which is required. Also the current testing rate for drugs is 25% instead of 50%.
- 4). The Cathodic protection section of your O&M manual references the figures, 1, 2 and 3, which are not in the manual.

2. The above areas of concern were covered in the exit interview with Mr. Patten, along with other minor items. We hope you will consider these areas of concern and take corrective action to further improve the safety of your pipeline.

Sincerely,

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

cc: Compliance Registry, OPS Headquarters