

STATE OF CALIFORNIA - STATE AND CONSUMER SERVICES AGENCY

OFFICE OF THE STATE FIRE MARSHAL

SOUTHERN REGION OFFICE
PIPELINE SAFETY DIVISION
1501 WEST CAMERON AVENUE
SOUT BUILDING, SUITE 250
WEST COVINA, CA 91790

June 26, 1991

U.S. Department of Transportation
Research and Special Programs
Office of Pipeline Safety
Attn: Edward Ondak, Chief
Western Region
555 Zang Street, 2nd Floor
Lakewood, Colorado 80228

Unocal has requested a waiver from the requirement of Part 195.416 (h) of CFR, Title 49 to cost five break-out tanks in the operator's "Junction Station" located in Kern County, California.

The break out tanks in question were installed some time during the 1970's. The Junction Station is located in a rural area with low humidity. The latest ultrasonic thickness data reveals no external pitting and metal loss due to external corrosion.

We have written UNOCAL indicating that their request for the waiver had been granted subject to your approval.

As a condition to the waiver, we have stipulated that the operator check the tanks in question ultrasonically on an annual basis to check for metal loss. We have further specified that if test results reveal that wall thicknesses of the tanks approach minimum design standards, the operator must coat the tanks.

In the letter to the operator, we tentatively established the effective date of the waiver to be October 1, 1991.

We appreciate your assistance on this matter.

(signed)
James Wait, Division chief
Pipeline Safety

JW:CJS:mjh

Memorandum

U.S. Department
of Transportation
**Research and
Special Programs
Administration**

Date: July 10, 1991 Reply to Attn. of:
Subject: **ACTION** : Waiver request - California Fire Marshal
(signature)
From: Edward J. Ondak, Chief, Western Region, DPS-28
To: Cesar DeLeon, Director for Regulatory Programs, DPS-10

I received the attached letter from the California State Fire Marshal's (CASFM) office seeking my approval for them to grant a waiver to Unocal. Basically, the CASFM wanted to make me aware of what they were doing and was under the impression that I would forward the waiver request to the proper people in Washington. This memo serves that purpose.

Unocal is an intrastate company subject to State jurisdiction. The waiver request pertains to section 195.416(h) and would allow Unocal to forego the requirement to coat five break-out tanks located in Kern County, California.

I have no problem with the waiver request as I feel the CASFM has adequately studied the situation and would not consider granting the waiver if safety was a problem.

Please take appropriate action as soon as possible.

July 24, 1991

Mr. James Wait
Division Chief
Pipeline Safety Division
California State Fire Marshal
1501 West Cameron Avenue
West Covina, CA 91790

Dear Mr. Wait:

Your letter of June 26, 1991, describes the State Fire Marshal's approval of an application by Unocal for a waiver of the coating requirements of 49 CFR 195.416(h). The application covers five break-out tanks in Unocal's Junction Station, located in Kern County, California.

Based on the facts presented in the letter, and the conditions stipulated in the waiver, we conclude the waiver is not inconsistent with pipeline safety. For this reason and because California has met the applicable provisions of the Hazardous Liquid Pipeline Safety Act of 1979 in granting the waiver, we offer no objection to the waiver.

Sincerely,

*Original signed by
Richard L. Beam*

George W. Tenley, Jr.
Associate Administrator
for Pipeline Safety

cc:

DPS-1/2/10/11/20/33; DCC-1
DPS-11:JWillock:rak:366-1640:7/23/91

FILE: California State Waiver File