



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

## **WARNING LETTER**

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 12, 2014

Mr. Randy Curry  
President  
Chevron Pipe Line Co.  
4800 Fournace Place Rm. C382A  
Bellaire, TX 77401-2324

**CPF 5-2014-0005W**

Dear Mr. Curry:

On September 17-20, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Northern California Gas Lines in Pittsburg, California.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

- 1. §192.605(a) Procedural manual for operations, maintenance, and emergencies**

**Each operator shall include the following in its operating and maintenance plan:**

**(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

Chevron Pipe Line Company (Chevron) did not follow their procedure, Core Gas Pipeline Operating and Maintenance 9.0 Maintenance Procedures Section 9.3.4.2, on calibrating gas detection instruments. The procedure stated that Chevron personnel were to “calibrate each leak detection instrument in accordance with the manufacturer's recommended calibration instructions” and also “on a regular schedule, considering the type of instrument and how the instrument is used.” The procedure also reminded personnel to “check hydrogen flame ionization (HFI) systems and CGI instruments for calibration at least once each month while in use.” Chevron was found to have insufficient documented evidence of periodic calibration of its gas detection instruments. A single record of calibration for a DP4 instrument performed by Heath Consultants on October 28, 2009 was found during the inspection. No calibration records, as required by their leak survey procedures, were found from 2010 and 2011 to validate the 2010 and 2011 annual leak surveys, in which a gas detection instrument was used. Chevron must follow its procedures in accordance with 192.605(a), and conduct and document periodic calibration of its gas detection instruments.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a 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 identified in this letter. Failure to do so will result in Chevron Pipe Line Co. 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 5-2014-0005W**. 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,

A handwritten signature in black ink, appearing to read "Chris Hoidal". The signature is fluid and cursive, with the first name "Chris" written in a large, stylized loop, and the last name "Hoidal" written in a more standard cursive script.

Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 C. Ishikawa (#138142)