



*Gerald Henderson*  
Terminal Manager

*Chevron Americas Products Company*  
Willbridge Terminal  
5924 NW Front Avenue  
Portland OR, 97210  
hendersonj@chevron.com

September 12, 2017

Kim West  
Acting Director, Western Region  
Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration (PHMSA)  
U.S. Department of Transportation  
12300 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

**RE: CPF No. 5-2017-6031M**

Dear Ms. West,

On July 25-29 2016, a PHMSA representative conducted an on-site pipeline safety inspection of Chevron Products Company's (Chevron) Willbridge Terminal in Portland, Oregon. As a result of the inspection, PHMSA issued a Notice of Amendment (NOA) dated August 17, 2017. This letter is in response to the referenced NOA, received August 22, 2017, requiring revision of Operating and Maintenance (O&M) Procedure 604.1 Exposed Pipe Coatings to comply with 49 C.F.R. § 195.583, as described below:

*§ 195.583 What must I do to monitor atmospheric corrosion control?*

- (a) You must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: If the pipeline is located Onshore then the frequency of inspection is: at least once every 3 calendar years, but with intervals not exceeding 39 months .....*
- (b) During inspections you must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.*

Chevron has revised its Distribution Terminals O&M Manual, Procedure 604.1 Exposed Pipe Coatings to require atmospheric corrosion inspections at least every 3 calendar years, not to exceed an interval of 39 months. In addition, Chevron has included language to describe the facility areas slated for particular attention during the inspection as required by 195.583(b).

Attached is the Chevron U.S.A., Inc. O&M Manual for Regulated Distribution Terminals, revision 6b, section 604.1. Please let us know if you require any additional information.

Sincerely,



*Gerald Henderson*  
Terminal Manager

Enclosures: **Chevron U.S.A., Inc. O&M Manual Section 600**