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May 20, 2024

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Dustin Hubbard  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
12300 West Dakota Ave., Suite 110  
Lakewood, CO 80229

Reference: CPF 5-2024-017-WL

Dear Mr. Hubbard,

Alyeska Pipeline Service Company (Alyeska) is providing this letter in response to the Pipeline Hazardous Materials Safety Administration (PHMSA) Warning Letter CPF 5-2024-017 dated March 13, 2024, which summarized the results of the June 7 to December 15, 2023 inspection of crude oil breakout tank 35-TK-150 (TK-150) inspection and repair documentation. This letter summarizes actions taken by Alyeska to ensure the integrity of TK-150 and the safety of the Trans Alaska Pipeline System (TAPS).

Warning Letter CPF 5-2024-017 alleged that Alyeska failed to repair TK-150 in accordance with §195.205(b)(1) by not conducting the following non-destructive examinations on fifteen (15) tank bottom repairs:

- Root weld examination requirements of API Std 653 section 9.10.1.2(c) were not followed during the welding of multiple patch plates to the floor of TK-150, and
- Magnetic particle or liquid penetrant non-destructive examination of the shell-to-bottom joints were not performed prior to installing multiple patch plates, as required by API Std 653 section 12.1.6.3.

As discussed with PHMSA during the inspection of TK-150, Alyeska self-identified this issue in August 2023, while tank repairs were in progress and prior to receiving PHMSA's Warning Letter. An independent engineering contractor was consulted and through engineering analysis, determined that the integrity of TK-150 was suitable with the repairs as-conducted. Based on the engineering disposition and recommendation, Alyeska accepted the repairs as complete.

Following receipt of PHMSA's Warning Letter, Alyeska opted to remove and replace the subject repair plates identified in the Warning Letter. This included removal of discrete sections of the internal tank corner weld in proximity to each patch plate. The corner weld sections were replaced, and new repair plates installed along with non-destructive examination in accordance with API Std 653. A hydrostatic testing exemption was conducted as the corner weld replacement scope is defined as a major repair per API Std 653. This work was performed in April of 2024 and Tank 150 was returned to service in May 2024.

If you have any questions regarding this information, please contact Janine Boyette at (907) 787-8858 or me at (907) 787-8061.

Please address all formal written responses to:

Allison Iversen  
HSEC Director  
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Sincerely,

Allison K. Iversen  
HSEC Director

cc: Gabrielle St. Pierre  
Chris Lyon  
DOT-WRADMIN