

PI-80-0103

August 20, 1980

Mr. E.I. Allen
President — Standard Pipeline Company
Chevron U.S.A. Inc.
P.O. Box 7643
San Francisco, CA 94120

Dear Mr. Allen:

This acknowledges your letter dated July 3, 1980, notifying us in accordance with 49 CFR 195.6 of the proposed transportation of contaminated pond water from the Morro Bay facility to a disposal site near Kettleman City, California.

Based on the information contained in your letter, we find that the proposed transportation by pipeline of the contaminated pond water is not unduly hazardous and you may proceed to transport the material in the manner proposed.

Sincerely,

SIGNED

Melvin A. Judah

Acting Associate Director

for Pipeline Safety Regulation

Materials Transportation Bureau

Chevron
575 Market Street
P.O. Box 7643
San Francisco, California

July 3, 1980

Dear Mr. Santman:

Standard Pipeline Company, a wholly owned subsidiary of Chevron U.S.A. Inc., owns and operates a pipeline in California extending from Morro Bay to Kettleman City. The pipeline serves a marine terminal at Morro Bay and ties into another pipeline system at Kettleman City. This pipeline has been idle for several years.

Standard Pipeline Company now proposes to activate this pipeline for the purpose of transporting a contaminated pond water from its receipt at the Morro Bay Marine Terminal to a Class I disposal site operated by Environmental Disposal Services near Kettleman City. The contaminated pond water originated at Chevron Chemical Company's Richmond manufacturing facility in Richmond, California. Heavy rains this last winter filled diked evaporation ponds located at the facility and necessitated a controlled release of the contaminated pond water into the San Pablo Bay to avoid breaching of the dikes. This discharge resulted in a Cease and Desist Order from the California Regional Water Quality Control Board. Part of this order required Chevron Chemical Company to dispose of approximately 2 million barrels of this contaminated pond water to prevent a reoccurrence of this problem. A portion of this material requires disposal in a Class I disposal site. An evaluation of alternatives by Chevron Chemical Co. included a proposal to ship this material via marine transportation from Richmond to the Morro Bay facility where pipeline access was available for the final movement to a Class I disposal site. Attached are Tables I & II listing the composition and Tables III, IV & V listing the toxicity of the contaminated pond water.

This material does not appear to be a hazardous material as defined in 49 CFR Parts 171-173. However, this notice of a proposed change in the commodity transported (as required by 49 CFR Part 195.6) via pipeline is being sent to you for approval.

The following presents the information required with this submittal per 49 CFR Part 195.6 (b):

- (1) Chemical name - see Table I
- (2) Common name - see Table I
- (3) Hazard classification per Part 173 - unknown material is not on list or classification - Poison B is closest classification. See Tables III, IV & V.
- (4) The pipeline (route shown in Drawing I attached) is completely fabricated of steel pipe. The pipe consists of 8" and 10" diameter lines lapweld and grade B & C.
- (5) The pipeline has been hydrostatically tested to over 125% of the maximum operating pressure required to pump the material. Pump Station discharge pressures will be limited to 800 PSIG.
- (6) The line will be operated with high and low pressure alarms and shutdown equipment. Operations will also include hourly comparisons of volumes pumped to volumes delivered for additional leak detection. In general, the line will be operated in accordance with 49 CFR Part 195.

If you require further information, please contact our Mr. G. T. Brower at 415-894-5191. May we have your approval to proceed with this commodity transportation? Thank you for your assistance.

Very truly yours,
E.I. Allen
President — Standard Pipeline Company