



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

September 4, 2020

Mr. James Hosler
Assistant Deputy Director
Chief of Pipeline Safety and CUPA Programs
Department of Forestry and Fire Protection
Office of the State Fire Marshal
3780 Kilroy Airport Way, Suite 500
Long Beach, California 90806

Re.: Docket No. PHMSA-2020-0109

Dear Mr. Hosler:

On August 31, 2020, pursuant to 49 United States Code (USC) § 60118(d), the Pipeline and Hazardous Materials Safety Administration (PHMSA) received a notification letter from CAL FIRE - Office of the State Fire Marshal (OSFM), granting a waiver of 49 Code of Federal Regulations (CFR) § 195.452(h)(4)(iii)(H) to Plains West Coast Terminals, LLC (Plains). This waiver will allow Plains to evaluate and remediate corrosion along the longitudinal pipe weld seam using engineering analysis instead of treating the corrosion anomalies as a 180-day remediation condition.

The OSFM issued the state waiver to Plains for variance from the evaluation and remediation requirements of 49 CFR § 195.452(h)(4)(iii)(H) for 12.2 miles of 16-inch diameter pipeline (Plains L513-517 Pipeline) between Cerritos and El Real, California, 15.7 miles of 16-inch diameter pipeline (Plains L518-522 Pipeline) between El Real and El Segundo, California, and 7.6 miles of 16-inch diameter pipeline (Plains L528-529 Pipeline) between Dominguez Hills and Cerritos Channel, California. The Plains pipelines under this waiver must be hydrostatically tested using a “spike” hydrostatic test within a year of the waiver being granted. The pipelines also must be inspected with in-line inspection tools capable of assessing seam integrity and detecting corrosion, deformation, and cracking-type anomalies within 180 days after the “spike” hydrostatic test, and thereafter reassessed at least every three (3) years.

Pursuant to 49 USC § 60118(d), PHMSA does not object to issuance of this waiver by the OSFM for the Plains pipelines providing that the conditions set forth in the waiver complies with the specific requirements. PHMSA requests that a copy of OSFM's final waiver to Plains be forwarded to PHMSA within 30 days of the issuance.

If you wish to discuss this or any other pipeline safety matter, my staff would be pleased to assist you. Please contact Sentho White, Director of Engineering and Research Division, at 202-366-2415, for technical matters.

Sincerely,

ALAN
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MAYBERRY

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Alan K. Mayberry,
Associate Administrator for Pipeline Safety