

Ref No. Docket PL-030616

October 2, 2003

Captain Stephen P. Black  
NAS-Whidbey Island-N41  
Building 2547  
Oak Harbor, Washington 98278-5300

Dear Captain Black:

**Subject: 2003 Hazardous Liquid Pipeline Safety Inspection**

A hazardous liquid pipeline safety inspection for your pipeline facility was conducted on July 21 and July 22, 2003. A pipeline safety inspector from the Washington Utilities and Transportation Commission (WUTC) met with Mr. Ignacio Cabilan, representatives from Doss Aviation, Inc. and Mr. Bob Dunham representing the Navy. The purpose of the inspection was to evaluate Doss's operation of the Navy's pipeline system. Enclosed, please find a copy of the letter sent to Doss Aviation, Inc. stating that no deficiencies had been found at the time of the inspection.

The inspection included a review of the Naval Air Station-Whidbey Island Operations and Maintenance Manual (O&M), which is required under 49 CFR 195.402. The O&M manual is maintained by Navy personnel. During this review, it was determined that several recently adopted items need to be included in the manual so it complies with the provisions of 49 CFR 195. These items are described in the attachment and were discussed with Mr. Bob Dunham.

Please do not hesitate to contact Joe Subsits, Pipeline Safety Engineer at (360) 664-1322, should you have any questions or comments.

NAS-Whidbey Island-N41

Docket No. PL-030616

October 2, 2003

Page 2 of 3

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

Alan E. Rathbun

Pipeline Safety Director

Enclosure

cc. Bob Dunham, NAS-Whidbey Island

Ignacio Cabilan, Doss Aviation, Inc.

## ATTACHMENT

1. **195.561(a) When must I inspect pipe coating used for external corrosion control?**  
There needs to be a statement in manual requiring that pipe coatings be inspected prior to lowering in ditch.
2. **195.561(b) When must I inspect pipe coating used for external corrosion control?**  
There needs to be a statement in the Manual that any discovered coating damage is to be repaired.
3. **195.563 Which pipelines must have cathodic protection?**  
There needs to be a statement in the Manual that cathodic protection must be operational less than one year from the date of construction, relocation, replacement or other changes.
4. **195.567 Which pipelines must have test leads and what must I do to install and maintain leads?**  
There needs to be a statement in the Manual needs that test leads be maintained in a condition that allows for electrical measurements to be taken.
5. **195.573(a)(2) What must I do to monitor external corrosion control?**  
There needs to be a statement in the Manual identifying the circumstances in which close-interval or comparable technology are used.
6. **195.402(c)(14) Procedural manual for operations, maintenance and emergencies?**  
There needs to be a statement in the manual addressing the precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas and making available when needed at the excavations, emergency rescue equipment including breathing apparatus and, a rescue harness and line.