To: Commander Naval Base Point Loma
Commander Navy Region, Southwest Division
Mayor Jerry Sanders
City Council Member Kevin Faulconer
Supervisor Greg Cox
Assembly Member Toni Atkins
State Senator Christine Kehoe
Congresswoman Susan Davis
Senator Dianne Feinstein
Senator Barbara Boxer
California Coastal Commission
Coastal Keepers

RE: The Naval Base Point Loma – Miramar Vintage Jet Fuel Pipeline – "The Sleeping Giant"

Dear Addressees:

The purpose of this correspondence is both to express and to document the significant concerns that the Peninsula Community of the City of San Diego has with regard to an aging jet fuel pipeline that is utilized and administered by the US Navy, the US Marine Corps, and Kinder Morgan Energy Partners of Los Angeles, CA. These concerns have arisen not only due to the pipeline's significant age (originally built in 1954), but also due to the fact that the pipeline runs along a portion of the San Diego Bay, across at least one earthquake fault line (and possibly more), under the San Diego River bed, and through numerous neighborhoods in the City of San Diego. As has been demonstrated numerous times, and most recently by the Exxon spills into the Yellowstone River in Montana, the best time to address high risk petrochemical toxic spills are before they happen and before the environment is endangered. Thus, we are writing to you all to urge your attention to a fully preventable potential environmental situation at the minimum and a potential man-made environmental disaster at the worst.

The pipeline (as shown on the attached map) is between 16 and 17 miles in length and runs between the Fleet Industrial Supply Center (FISC) San Diego Fuel Department (Point Loma Annex) on Naval Base Point Loma and the Marine Corps Air Station (MCAS) Miramar Fuel Branch. The pipeline is an eight-inch buried ***single walled*** carbon steel pipeline that is pressurized at 800 p.s.i. It is our understanding that this fuel pipeline transports in the neighborhood of 7.7 million barrels of fuel (or over 323 million gallons) of jet fuel each year, involving over 1,275 fuel evolution/transfers per year. Any way you look at it, it is a lot of jet fuel being pumped frequently at high pressure.

To the best of our knowledge, other than a section of the pipeline which crosses the north side of the San Diego River, the vast majority of this pipeline has not been replaced in over 56 years, although there have been a number of visible repairs to this pipeline over the years. At several locations and at several times over this time frame, the pipeline has become exposed along the San Diego Bay in the La Playa area of the Peninsula Community. And, again, it runs through at least one earthquake fault line and through an area subject to seismic activity. Additionally, it should be recognized that the developed profile of the communities through which the pipeline runs has changed substantially over the past 56+ years; what was once remote, undeveloped or under developed land may now have an urban residential or commercial profile. The urban landscape has changed, while the jet fuel pipeline continues to age.

All of these issues give rise to reasonable concerns of the citizens of this Community. So that the Peninsula Community (and the City of San Diego at large) may allay their concerns as to the risks posed by this aged pipeline, and so that confidence may be restored to the Community and public in general, we seek a transparent response to the list of questions attached to this letter. We have expanded the distribution of this letter to advise and seek the support of each and every addressee to assure that this issue does not fall off our collective radars. We also request that after the Navy has had the opportunity to review and research the issues noted in this correspondence, that a representative of the Navy contact the Peninsula Community Planning Board so that a time may be set for a meeting as soon as possible to provide our Community with your update and answers to the questions that we have posed herein.

Sincerely,

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Suhail Khalil
Chair, Peninsula Community Planning Board

Questions addendum:

(1) What are the Navy's 21st Century plans for this 57 year-old fuel pipeline? Mothball / decommission? How much longer does the Navy anticipate using the existing pipeline?

(2) What is the current operating condition of the pipeline?

(3) How was this operating condition verified? When was it last verified? And what is the frequency of on-going verifications?

(4) Does the Navy have a Service Life Verification Plan in place?

(5) What is the remaining service life of the pipeline?

(6) Have independent inspections, repairs, tests, thickness measurements been made on the TOTAL length (17 miles) of the pipeline? If so, the Community requests access to the results of these inspections and related reports.

(7) What was the ORIGINAL wall thickness of the pipeline? Please confirm that the pipeline is a single walled carbon steel composition.

(8) What is the CURRENT wall thickness of the pipeline?

(9) What is the current corrosion rate?

(10) What percentage of the wall thickness has corroded?

(11) Were multiple locations subjected to the thickness and corrosion measurements? (Bends, valves, etc.)

(12) When was the pipeline subjected to a complete hydrostatic test?

(13) What code standard hydrostatic test was applied?

(14) What other examination techniques have been applied to determine safety & reliability of the pipeline?

(15) Are there automatic sensors and on-line analysis devices that will detect a pressure drop that might indicate a leak and thus, automatically take the remaining pressure out of the line when a leak is detected in order to minimize the volume of a spill? If so, what is the reaction time of that system and how often is it tested?

(16) How often are the shutoff valves tested and may the Community have access to the results of those tests?

(17) After the section of the pipeline that transverses the San Diego River was replaced, was the entire pipeline again hydrostatically tested, and if so, at what p.s.i. and with what results?

(18) How were and how are defects and other indications evaluated?

(19) Did the Navy utilize independent services? And do they utilize independent services on an ongoing basis?

(20) What N.D.E. / N.D.T. techniques were utilized? (NDE – Nondestructive Evaluation / NDT – Nondestructive Testing)

(21) Since the pipelines runs through the Rose Canyon Earthquake Fault Lines, what geologic & geophysical hazards has the pipeline experienced and what consequences have been recorded and/or mitigated?

(22) Does the Navy have a full time seismic safety engineer on the fuel line staff?

(23) Is the safety engineer familiar with geology of the pipeline site? Soil characteristics? Drainage? Seismic zones? Earthquake history? Civil hazards?

(24) Does the Navy have an Emergency Contingency Plan in place? If so – can it be shared with the Community?

(25) Does the Navy have an Earthquake Readiness Plan in place? Again, if so, can it be shared with the Community?

(26) Does the Navy have a C.E.R.T (Community Emergency Response Team) in place? If so, how frequently do they run test responses?

(27) Has a security plan been drafted for the pipeline?

(28) Is there a security fence surrounding above ground areas of the pipeline?

(29) What steps have been initiated to minimize the potential for construction crews to unknowingly disturb or otherwise affect the pipeline?

(30) Has the Navy completed any analysis under the National Environmental Policy Act, Clean Water Act, California Environmental Quality Act, or other analysis of environmental impacts of this pipeline, or segments of this pipeline, in the time since the pipeline was originally constructed? If so, the Community requests access to those documents.

(31) Was the safety of the general public (La Playa and surrounding communities) been addressed by the Navy when permits were applied for in these jurisdictions?

(32) Is there an evacuation alarm system for the pipeline and local areas?

(33) Population density for this 17 mile pipeline has changed vastly since 1954; has the Navy addressed roads, railroads, highways, permits, private/public rights of way since the initial installation?

(34) Has the Navy created scenarios for fuel pipeline leaks and other accidents; and if so, has the Navy assessed and tested how well their emergency, certification and earthquake readiness plans maintain safety and reliability?

Map of the NBPL – MCAS Miramar Jet Fuel Pipeline: