Thomas J. Vilsack
Governor
Sally J. Pederson
Lt. Governor

E.A. "Penny" Westfall
Commissioner

MEMORANDUM

To: George Howe, State Fire Marshal

From: Ray Reynolds, #719

Ref: Williams Pipeline

Date: Feb. 7, 2001

The enclosed information outlines my response to the petroleum leak at William's Pipeline on March 3, 2000. I issued orders to the site. I did receive a response from William's Pipeline on September 11, 2000. The letter indicated that the site has made changes according to our "recommendations" but they felt that they were exempt from registering their tanks and complying with State of Iowa codes.

William's cites Iowa Code 101.22A as the justification.

"An aboveground petroleum storage tank which is subject to regulation or registration under either the federal department of transportation or state department of transportation or both. Is exempt from the registration requirements of section 101.22."

I contacted the Federal DOT in Kansas City, Ks. They indicate that they do inspect large "breakout tanks" at William's by reviewing their site operation procedures. They have been increasing their inspections to every 4-6 years.

William's Pipeline has registered 145 tanks out of nearly 1,000* tanks they have meeting the size for registration. The other tanks that are not registered, (including 28 tanks in Coralville) are large tanks that William's believes are exempt.

The site in Coralville has 28 tanks ranging in sizes 200,000 to 2,000,000 gallon.

To date, William's Pipeline is the only company using this code to render their tanks exempt from Iowa's registration laws.

* The figure of 1,000 tanks total is an estimate given to me by William's Pipeline officials

STATE OF IOWA

THOMAS J. VILSACK
GOVERNOR

SALLY J. PEDERSON
LT. GOVERNOR

DEPARTMENT OF PUBLIC SAFETY

E. A. "PENNY" WESTFALL
COMMISSIONER

MEMORANDUM

TO: Roy Marshall, State Fire Marshal

FROM: Raymond Reynolds, Inspector #719

DATE: March 3, 2000

REF: William's Pipeline Diesel Spill

COPY

On 3-3-2000, I responded to William's pipeline in Coralville, Iowa to conduct an inspection at your direction. The following information is submitted for your information.

FACILITY HISTORY: William's Pipeline was started in the 1930's. They receive fuels and oils from Chicago and Des Moines via underground pipelines. On their site sits 28 above ground storage tanks ranging from 200,000 gallons to 2,000,000 gallons. According to the records and my knowledge, this office has never inspected the facility.

A bulk additive station has been added within the previous 12 years. This required the installation of a dozen or so above ground storage tanks containing class I and class II flammable liquids. Few changes have occurred at the facility since it's start.

DIESEL SPILL: On Friday, after 1400 hours, a secondary line broke causing roughly 714 barrels (32,000 gallon) of Class II Diesel fuel to spill out of pipes onto the ground. The Diesel traveled a short distance to a system drain for storm water that may accumulate on William's Pipeline property. The drains fed into a small creek that connects with Clear Creek. A passing bus driver reported the spill on Saturday, February 26th, 2000. Fire fighters were able to stop the diesel spill before it reached Clear Creek.

William's Pipeline officials are working with DNR, EPA, and other agencies to collect the product. They report that a majority of the product has been skimmed off the small creek. They are digging the grounds up to test soil depths of contamination. At this point the soil has soaked diesel to a depth of about 15-20 feet deep.

PIPE FAILURE: During my on-site inspection, I was told of the findings from investigators within the company. Tank #1436 is a 2,000,000-gallon tank that had about 5 feet of product (roughly 252,000 gallons) inside from the pipeline. The tank has a 3-inch steel pipe that connects to another tank for holding until piped to the loading rack. This 3-inch line was "blinded" (capped off) at the distant end because the product was piped to the main loading rack. The 3-inch line is no longer in use.

The main shut off valve installed in the 1930's indicated it was closed. The valve gate inside was broken and actually was ½ open. (photos taken) This valve failure caused an open release of product to collect into the closed off pipe that travels to the opposite side of the facility. Diesel fuel was allowed to sit dormant inside the closed pipe.

Over the course of time, the changing temperatures and weight of the diesel cause a flanged connection to break. The security bolts broke causing a release of product onto the ground. The pipe break was located on a bend in

the pipe. This bend in the pipe was not supported adequately. This was the weakest link in the pipe. Evidence of this finding was the bolts that were recovered used to hold the flanged joint together. They were cracked in half and rusted at the cracked ends. The flange bolts appear to have been broken for some time until disengagement of the connection occurred.

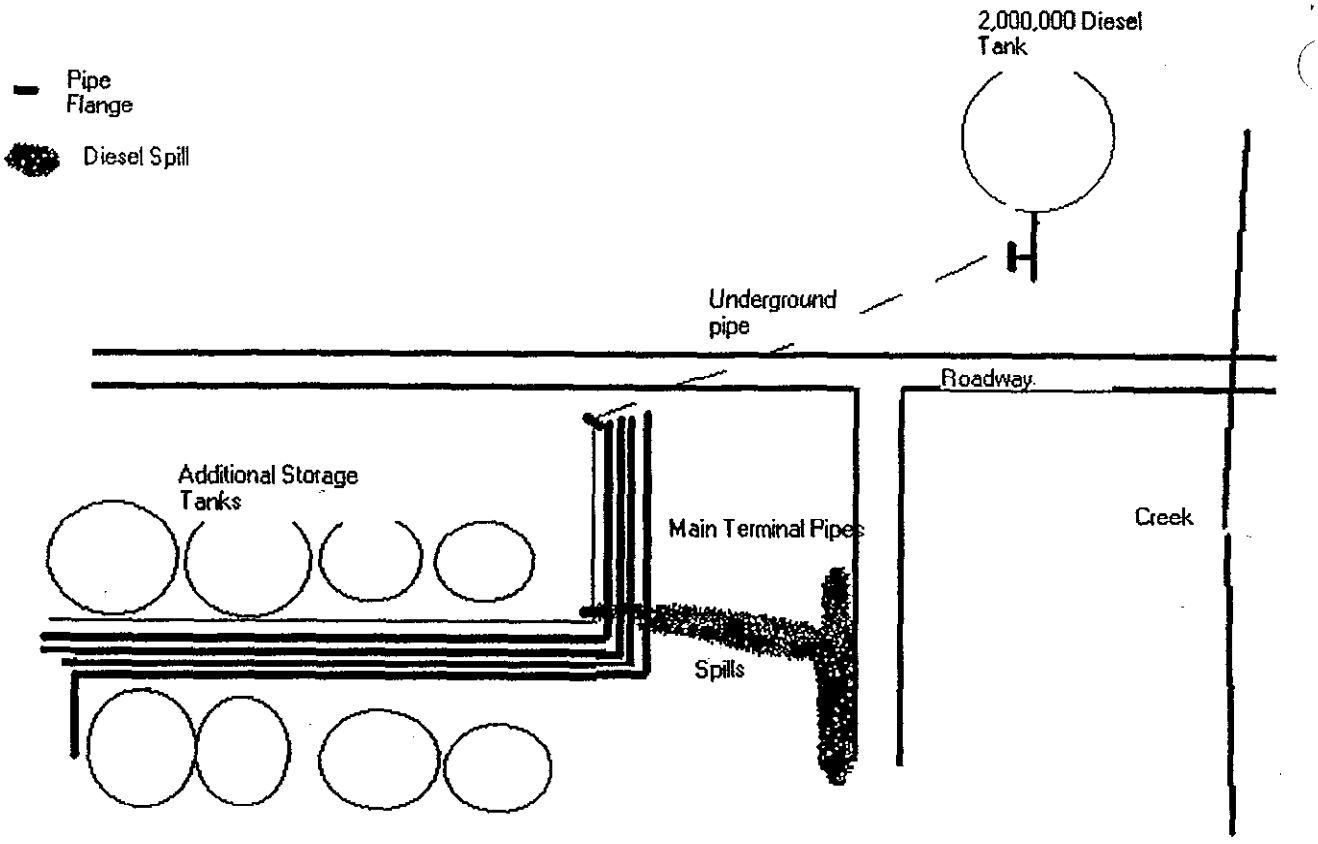
SUMMARY: It is the opinion of this inspector that the facility encountered a spill as a result of an aged system. It appears as though this office did not receive plans or registration information for the above ground storage tanks located on this property. A field inspection was not conducted of the facility according to William's Pipeline staff. None of the 28 large tanks and 12 smaller tanks are registered with the State Fire Marshal.

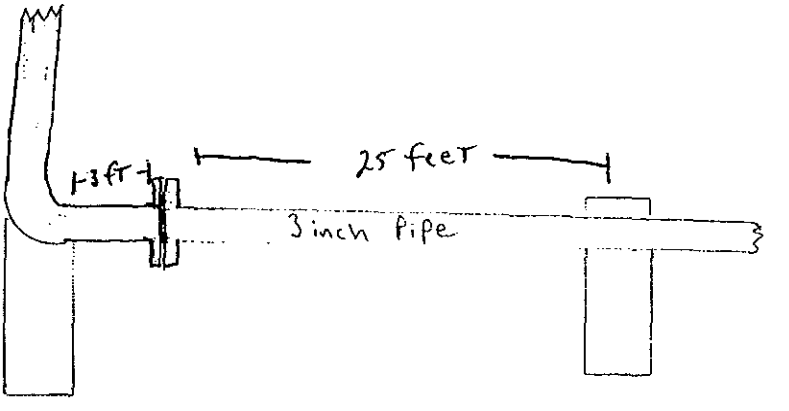
The pipe joint failed as a result of a valve that was partially open when the handle indicated it was fully closed. The pipe system does rely on combustible fittings and threaded bolts to connect the two flanged ends. According to NFPA 30, 1993 edition, Section 3-4.2, this pipe should have been properly designed so that any spill resulting from disengagement of the flange connections would not pose a risk to public safety.

The pipe system was not supported correctly in accordance with NFPA 30, 1993 edition, Section 3-5. The weight of the pipe added to the stress on the flange, ultimately breaking the bolts. The closest support to the flanged connections was 25 feet away. Sections of the 3-inch pipe were not secured to the supports. The pipe had 2-3 inches of movement vertically when inspected empty.

The facility staff indicated that flange connections for main pipelines are inspected annually. All other empty (or non-used) pipes and connections are not inspected. NFPA 30, 1993 edition, Section 5-6.3.2 indicates maintenance and operating practices shall control leakage and prevent spillage of flammable liquids. The 2,000,000-gallon tank had a 7-inch drop of product before a passerby driver saw product on the ground. There was no method in place to identify this leak while the facility was unmanned. This equates to 32,000 gallons of diesel.

Orders to the facility pertaining to this matter and other AST requirements that are not met will be sent to the facility supervisor.


Pipe
Flange
Diesel Spill
2,000,000 Diesel Tank
Underground pipe
Roadway
Additional Storage Tanks
Main Terminal Pipes
Creek
Spills


3 ft
25 feet
3 inch pipe

STATE OF IOWA

THOMAS J. VILSACK
GOVERNOR

SALLY J. PEDERSON
LT. GOVERNOR

DEPARTMENT OF PUBLIC SAFETY

E. A. "PENNY" WESTFALL

COMMISSIONER

March 6, 2000

WILLIAM'S PIPELINE
MR. TIM POWERS
912 1st AVENUE
CORALVILLE, IOWA 52241

Dear Mr. Powers:

This office received a complaint regarding the diesel fuel spill that occurred on or around Friday, February 25, 2000, at your property. This office regulates the safe storage and handling of flammable/combustible liquids in the State of Iowa. All storage of flammable or combustible liquids exceeding 1,100 gallons requires registration with this office. An above ground registration sticker is then issued for each tank meeting NFPA 30, 1993 Edition.

The following State Fire Marshal orders are issued to you as a result of my inspection of your facility on March 3, 2000. You are ordered to comply with the violations listed below to comply with Iowa Administrative Code.

STATE FIRE MARSHAL ORDERS
COMPLY AS FOLLOWS:

1) Iowa Code Chapter 101, Section 101.22: Submit plans of your storage operations for this office to approve. Plans shall show compliance with NFPA 30 Standards, 1993 edition. Upon approval of your plans, above ground registration forms will be sent to you for registering all above ground storage tanks exceeding 1,100. Registration is required for all storage of flammable/combustible liquids over 1,100 gallons regardless if the tanks are new or existing.

2) Iowa Administrative Code Chapter 5, Section 661-5.301 (2): Submit written approval that the local jurisdiction has approved the storage of flammable liquids within their city limits.

3) NFPA30, 1993 Ed., Section 3-5: All piping shall be properly and adequately secured. The pipe section that broke is an unused line. Remove the line or assure the pipe is properly secured to supports and supports are adequately spaced for the weight of the product. The pipe that broke had a 25 feet section where the pipe was not supported. This area contained a flange connection. Sections of the pipe were bolted to supports where other sections were resting on the support with no means to attach the pipe to prevent movement.

4) NFPA30, 1993 Ed., Section5-6-3.2: Provide annual inspections to all valves and pipes to assure proper operations. Maintenance and operation shall be geared towards preventing spills that may pose a danger to public safety. During the inspection, it was determined that only valves of operational pipes were inspected. Expand your inspection process to cover all pipes, valves, and connections.

5) NFPA30, 1993 Ed., Section 3-4.2: Provide for proper security to flange connections and prevent spills from reaching public waterways, public areas, or buildings should detachment of flange connections occur. (You facility has recently filled storm water drains with cement near pipes in order to prevent spill contamination of public areas. Indicate in your plans as to the location of sealed storm water drains.)

6) NFPA30, 1993 Ed., Section 2-2.1(b): Remove the two gravity flow tanks in the fuel additive tank area. These tanks are being used for lawn mowers. Gravity flow tanks are not approved for use in Iowa except agricultural and temporary construction use.

-Remove the unapproved tanks that were located in the fuel additive tank area. Of the 12 or so tanks in this area. Some do not have a UL rating and are not approved for use. Only UL approved tanks or tanks meeting a national testing standard shall be used for the storage of flammable/combustible liquids. Tanks that have a welded data plate stamped with the UL logo are approved for use.

7) **NFPA30, 1993 Ed., Section 2-9.3**: Properly label all tanks so that emergency responding personnel will readily identify the contents inside the tanks. Hazardous material placards are approved for use in labeling tanks.

8) **NFPA30, 1993 Ed., Standard 3-9**: Each pipe coming from loading and unloading terminals shall be properly labeled, color coded, or marked to indicate the product that is being transported.

Submit written plans and responses for the above orders to facilitate approval from this office. Should you have other facilities in Iowa that have above ground storage tanks that have not been registered, plans shall be submitted for approval in a timely manner.

I can be reached by calling (515) 281-5821.

Respectfully,

Raymond Reynolds
Flammable Liquid Enforcement

CC: Roy Marshall, State Fire Marshal
Coralville Fire Department
Office file

September 11, 2000

Williams

ENERGY SERVICES
1717 South Boulder Avenue
P.O. Box 21628
Tulsa, Oklahoma 74121-1628

Mr. Raymond Reynolds
State Fire Marshal's Office
621 E. 2nd Street
Des Moines, Iowa 50309 [VIA U.S. Mail and FASCIMILE 515-242-6299]

Re: State Fire Marshal's Letter dated March 6, 2000

Dear Mr. Reynolds:

The purpose of this letter is to respond to your letter dated March 6, 2000 setting forth orders from the State Fire Marshal's Office. First, however, I would like to apologize for delay in getting back with you.

Williams understands that the State Fire Marshal has been granted the authority to inspect and investigate aboveground petroleum storage tanks pursuant to Iowa Code Chapter 101. Also, that there is an exception for tanks which are subject to regulation by the DOT. This exception specifically provides that, "An above ground petroleum storage tank which is subject to regulation or registration under either the federal department of transportation or state department of transportation or both, is exempt from the registration requirements of section 101.22". *See* ICA Sec. 101.22A. Williams believes that this exception is consistent with federal preemption over state regulation of interstate pipelines and must be considered by your office.

Important to this consideration is the fact that the Williams pipeline servicing the Coraville terminal facilities is an interstate pipeline that is regulated by the United States Department of Transportation (DOT). The above ground petroleum storage tanks at this facility are viewed as breakout tanks which are incidental to and a part of Williams' interstate pipeline facilities. *See* Exxon Corporation v. United States Secretary of Transportation, 978 F. Supp. 948 (E.D. Wash. 1997). In the Exxon case, the court held that the federal DOT has jurisdiction over similar above ground petroleum storage tanks.

This being said, Williams appreciates and shares the Fire Marshall's concern for safety and voluntarily shares actions which would otherwise demonstrate compliance with orders set forth in the March 6, 6000 letter.

Item #3 – The pipe section that broke has been removed from service and both ends of pipe disconnected from the tanks, with blind flanges installed at each end. All liquid was removed from the line, which was purged with nitrogen.

Item #4 -- Williams not only inspects its operational valves but also, all associated manifold components including valves.

Item #5 – All drain lines that run to the creek have been plugged, or are controlled by valves that are normally closed. The valves are opened only during times when the facility is staffed with trained, experienced personnel and then only when the dike impoundment areas need to be drained of surface water following rain or melting snow. After drainage is complete, the valves are immediately closed.

Item #6 – The two gravity fed tanks storing fuel used for lawn mowing are in the process of being replaced with tanks which meet the qualifications mentioned in your letter.

Item # 7 – All tanks in question have been labeled with appropriate hazardous material placards as an aid to emergency personnel, as well as our own personnel.

Item #8 – Each pipe going to the loading rack has been labeled to indicate the product or products transported through the lines.

In closing, Williams requests rescission of the State Fire Marshal's orders. Equally important, Williams wants to be a good neighbor and to work well with both state and local emergency response officials. Should you have ideas which could enhance this relationship, Williams would greatly appreciate a follow up meeting for a related discussion.

Sincerely yours,

Ken Lybarger
Sr. Compliance Coordinator
Asset Integrity

Thomas J. Vilsack
Governor
Sally J. Pederson
Lt. Governor

E.A. "Penny" Westfall
Commissioner

October 6, 2000

V. WILLIAMS CO.
KEN LYBARGER
1 WILLIAMS
SUITE 4100
TULSA, OK 74172

Ref: Aboveground Storage Tank Registration

Dear Mr. Lybarger:

The State Fire Marshal Division believes that your tanks located in the State of Iowa are subject to the $10 per tank registration requirements. Registration allows the State of Iowa to determine the location of large amounts of flammable and combustible liquid storage in the interests of public safety. You have indicated that you "are exempt" from said registration.

I have turned the matter over to the Attorney General's Office. Assistant Attorney General Jeff Farrel has been assigned to handle the case. The phone number to reach Attorney Farrel should you have questions, is (515) 281-5164.

Iowa Law states that all tanks exceeding 1,100 gallons which contains a Class I, Class II, or Class III liquid shall be registered with the State Fire Marshal. There is a $25 per tank late fee that is added to the $10 registration fee for those tanks in operation without prior approval. This late fee has been waived until the opinion of the Attorney General's Office is disclosed.

If you should decide to comply with registration, I can be reached to provide the appropriate registration forms. I can be reached by calling (515) 281-5821.

Respectfully,

Raymond Reynolds
Flammable Liquid Enforcement
State Fire Marshal Division

Department of Justice

THOMAS J. MILLER
ATTORNEY GENERAL

ADDRESS REPLY TO:
HOOVER BUILDING
DES MOINES, IOWA 50319
TELEPHONE: 515-281-5164
FACSIMILE: 515-281-4209

October 19, 2000

Ken Lybarger
Williams Energy Services
P.O. Box 21628
Tulsa, OK 74121-1628

Re: Iowa State Fire Marshal regulations

Dear Mr. Lybarger:

Ray Reynolds of the Iowa State Fire Marshal's Office asked me to respond to your letter of September 11, 2000. I apologize that I did not respond sooner, but my trial schedule has prevented me from looking into this issue.

You argue that Williams is not subject to Iowa Code chapter 101 based on the exemption in section 101.22A. Section 101.22A provides an exemption for owners of an "aboveground petroleum storage tank," if it is subject to regulation or registration by the federal or state department of transportation. You cite Exxon Corp. v. United States Dep't of Transportation, 978 F.Supp. 946 (E.D. Wash. 1997) in support of your argument. My review of the Exxon case indicates that it actually supports the Fire Marshal's position in this matter.

One of the points of discussion in Exxon was whether the tanks were "breakout tanks" as defined in DOT's regulations. See 49 CFR § 195.2. The relevant portion of the definition for a "breakout tank" is a tank used to "receive and store hazardous liquid transported by a pipeline for reinjection and continued transportation by pipeline." Exxon, 978 F.Supp. at 951. The court found that Exxon's tanks met this definition because Exxon admitted that at least some of the petroleum product received by Exxon was reinjected into the pipeline for continued transportation to customers located on down the line. Id. As a result, the court found that Exxon's tanks were subject to DOT's regulation.

It is my understanding that the contents of the tanks at issue in this case are not reinjected back into the pipeline. Tanks that are used for storage or used to transfer petroleum to non-

pipeline modes of transportation (e.g. trucks) are not subject to DOT regulation. Exxon, 978 F.Supp. at 950, n.3. Since your tanks are not subject to DOT regulation, Iowa Code section 101.22A does not come into play. Therefore, Williams would be required to register the tanks pursuant to section 101.22.

You also claim that the Fire Marshal's regulations are preempted by federal law. However, that argument is only valid if the federal statutes and regulations cover the state's regulation. Because DOT regulations do not cover the tanks in question, there is no preemption issue.

I appreciate your statements that Williams in concerned for safety and wants to otherwise demonstrate compliance with the Fire Marshal's safety regulations. However, we believe Williams not only has an ethical responsibility, but also a legal responsibility to comply with the state statutes and regulations. Therefore, we expect Williams to come into compliance.

Because this issue has been drawn out over some time, the Fire Marshal is willing to waive the late fee of $25.00 per tank for Williams' failure to register by October 1, 2000. Williams can comply by paying the regular fee of $10.00 per tank by December 1, 2000. If Williams does not comply by December 1, the Fire Marshal may seek enforcement action as provided in chapter 101, including enforcement of the $25.00 late fee and other penalties provided in section 101.26.

Please contact me if you have any questions about this letter.

Sincerely,

Jeffrey D. Farrell
Assistant Attorney General
(515) 281-6658

Copy to:

Ray Reynolds

WILLIAMS TANK DATA SUMMARY

11-Jan-01

	LOCATION			TANKS			CONSTRUCTION	
No.	Name	No.	Type (Material)	Contents Grade/Additive	GrBbls	Gallons	Yr Mfg.	BREAKOUT TANK YES/NO
20100	DES MOINES	329	Steel	O	260	10,920	1992	no, water tank
20100	DES MOINES	330	Steel	O	260	10,920	1992	no, water tank
20100	DES MOINES	201-50	Steel	O	560	23,520	1992	no
20100	DES MOINES	201-51	Steel	O	560	23,520	1992	no
20100	DES MOINES	590-50	Steel	O	600	25,200	1992	no
20100	DES MOINES	590-51	Steel	O	300	12,600	1992	no
20100	DES MOINES	201-050	Steel	9532M	99	4,158	NA	no, additive tank
20100	DES MOINES	201-020	Steel	7589	60	2,520	NA	no, additive tank
20100	DES MOINES	201-021	Steel	7590	60	2,520	NA	no, additive tank
20100	DES MOINES	201-040	Steel	CEPSD10	73	3,066	NA	no, additive tank
20100	DES MOINES	201-134	Steel	Centane Plus	48	2,016	NA	no, additive tank
20100	DES MOINES	201-132	Steel	Cold Flow Improver	71	2,982	NA	no, additive tank
20100	DES MOINES	201-130	Steel	OGA 422	191	8,022	NA	no, additive tank
20100	DES MOINES	201-061	Steel	Koch Soy	60	2,520	1998	no, additive tank
20100	DES MOINES	201-110	Steel	TFA 4908R	100	4,200	NA	no, additive tank
20100	DES MOINES	?	Steel	Empty	25,000	1,050,000	NA	no
22500	DUBUQUE	197	Steel	X9	939	39,438	1966	no
22500	DUBUQUE	336	Steel	O	260	10,920	1992	no
22500	DUBUQUE	628	Steel	N	18,150	762,300	1966	no
22500	DUBUQUE	629	Steel	A	18,193	764,106	1966	no
22500	DUBUQUE	789	Steel	N	27,537	1,156,554	1966	no
22500	DUBUQUE	790	Steel	X5	29,029	1,219,218	1966	no
27800	FORT DODGE	130	Steel	X9	984	41,328	1969	no
27800	FORT DODGE	589	Steel	X	9,595	402,990	1969	no
27800	FORT DODGE	799	Steel	X	28,523	1,197,966	1969	no
27800	FORT DODGE	1430	Steel	N	51,770	2,174,340	1969	no
27800	FORT DODGE	6026	Steel	N	17,734	744,828	1969	no
27800	FORT DODGE	6027	Steel	N	18,724	786,408	1969	no
27800	FORT DODGE	278-130	Steel	*XD Farmland*	35	1,470	1996	no, additive tank
27800	FORT DODGE	278-040	Steel	N Williams	35	1,470	1996	no, additive tank
27800	FORT DODGE	278-050	Steel	*XD Growmark*	60	2,520	1996	no, additive tank
20200	IOWA CITY	333	Steel	O	260	10,920	1992	no
20200	IOWA CITY	334	Steel	O	560	23,520	1992	no
20200	IOWA CITY	NONE	Steel	R	600	25,200	NA	no
20200	IOWA CITY	NONE	Steel	S	600	25,200	NA	no, Sludge Tank
20200	IOWA CITY	202-020	Steel	Paradyne 7589	60	2,500	NA	no, additive tank
20200	IOWA CITY	202-110	Steel	TFA-4908R	95	4,000	NA	no, additive tank
20200	IOWA CITY	202-050	Steel	9532M	95	4,000	NA	no, additive tank
20200	IOWA CITY	202-061	Steel	SCH-137KPS	60	2,500	1998	no, additive tank
20200	IOWA CITY	202-090	Steel	PFA-56	98	4,100	NA	no, additive tank
20200	IOWA CITY	202-132	Steel	Cold Flow Improver	71	3,000	NA	no, additive tank
20200	IOWA CITY	202-134	Steel	Celane Plus	48	2,000	NA	no, additive tank
20200	IOWA CITY	202-130	Steel	OGA-422	190	8,000	NA	no, additive tank
20700	MASON CITY	338	Steel	O	260	10,920	1992	no
20700	MASON CITY	633	Steel	A	17,911	752,262	1965	no
20700	MASON CITY	634	Steel	A	17,916	752,472	1965	no
20700	MASON CITY	635	Steel	E	17,937	753,354	1965	no
20700	MASON CITY	636	Steel	N	17,686	742,812	1965	no

WILLIAMS TANK DATA SUMMARY

11-Jan-01

	LOCATION		TANKS				CONSTRUCTION	
No.	Name	No.	Type (Material)	Contents Grade/Additive	GrBbls	Gallons	Yr Mfg.	BREAKOUT TANK YES/NO
21020700	MASON CITY	712	Steel	N	29,925	1,256,850	1965	no
21120700	MASON CITY	713	Steel	N	30,173	1,267,266	1965	no
21220700	MASON CITY	714	Steel	N	30,702	1,289,484	1965	no
21320700	MASON CITY	1312	Steel	Y	38,928	1,634,976	1950	no
214 20700	MASON CITY	1313	Steel	X	38,931	1,635,102	NA	no
21520700	MASON CITY	1314	Steel	X	38,942	1,635,564	1950	no
216 20700	MASON CITY	1315	Steel	N	36,891	1,549,422	1950	no
21720700	MASON CITY	1316	Steel	D	38,936	1,635,312	1950	no
218 20700	MASON CITY	1317	Steel	D	38,926	1,634,892	1950	no
21920700	MASON CITY	1318	Steel	N	39,768	1,670,256	1950	no
22020700	MASON CITY	1319	Steel	X	38,922	1,634,724	1950	no
221 20700	MASON CITY	1320	Steel	X	38,934	1,635,228	1950	no
22220700	MASON CITY	1321	Steel	X	38,931	1,635,102	1950	no
22320700	MASON CITY	1512	Steel	U8	64,894	2,725,548	1975	no
224 20700	MASON CITY	207-30	Steel	S	12,085	507,570	1954	no, Sludge
22520700	MASON CITY	207-51	Steel	O	12,600	529,200	1986	no, Sump water Tank
22620700	MASON CITY	207-9	Steel	S	14,929	627,018	1954	no, Sludge
22720700	MASON CITY	207-130	Steel	Williams additive	119	5,000	NA	no, Williams additive
22820700	MASON CITY	207-132	Steel	Williams additive	95	4,000	NA	no, Williams additive
229 20700	MASON CITY	207-131	Steel	Williams additive	48	2,000	NA	no, Williams additive
23020700	MASON CITY	207-110	Steel	*Texaco additive*	48	2,000	NA	no, Texaco additive
23120700	MASON CITY	207-050	Steel	*Growmark additive*	48	2,000	NA	no, Growmark additive
23220700	MASON CITY	207-040	Steel	*Cenex additive*	36	1,500	NA	no, Cenex additive
23320700	MASON CITY	207-061	Steel	*Koch additive*	48	2,000	NA	no, Koch additive
234 20700	MASON CITY	207-010	Steel	*Amoco additive*	48	2,000	NA	no, Amoco additive
23520700	MASON CITY	207-020	Steel	*Cenex additive*	71	3,000	NA	no, Cenex additive
236 22900	MILFORD	102	Steel	E	1,924	80,808	1985	no
23722900	MILFORD	125	Steel	X9	917	38,514	1967	no
23822900	MILFORD	126	Steel	N9	917	38,514	1967	no
23922900	MILFORD	320	Steel	O	560	23,520	1989	no
24022900	MILFORD	588	Steel	Y	9,718	408,156	1967	no
24122900	MILFORD	798	Steel	X	29,153	1,224,426	1967	no
24222900	MILFORD	1509	Steel	N	55,623	2,336,166	1986	no
24322900	MILFORD	4005	Steel	X	41,548	1,745,018	1967	no
24422900	MILFORD	6022	Steel	D	19,341	812,322	1967	no
24522900	MILFORD	6023	Steel	A	19,368	813,456	1967	no
246 211	OMAHA	421	Steel	E	6,000	252,000	1933	no
24711	OMAHA	422	Steel	N	6,000	252,000	1933	no
248 211	OMAHA	426	Steel	E	6,000	252,000	1937	no
24911	OMAHA	637	Steel	B	18,000	756,000	1931	no
250 211	OMAHA	639	Steel	Y	18,000	756,000	1931	no
25111	OMAHA	640	Steel	B	18,000	756,000	1931	no
252 211	OMAHA	647	Steel	A	18,000	756,000	1933	no
25311	OMAHA	725	Steel	Y	30,000	1,260,000	1931	no
254 211	OMAHA	726	Steel	A	30,000	1,260,000	1931	no
25511	OMAHA	740	Steel	N	30,000	1,260,000	1931	no
256 211	OMAHA	741	Steel	N	30,000	1,260,000	1933	no
25711	OMAHA	742	Steel	X5	30,000	1,260,000	1933	no

WILLIAMS TANK DATA SUMMARY

11-Jan-01

LOCATION				TANKS			CONSTRUCTION	
No.	Name	No.	Type (Material)	Contents Grade/Additive	GrBbls	Gallons	Yr Mfg.	BREAKOUT TANK YES/NO
258 211	OMAHA	750	Steel	N	37,000	1,554,000	1937	no
259 211	OMAHA	1401	Steel	Q	56,000	2,352,000	1950	no
260 211	OMAHA	1403	Steel	X	56,000	2,352,000	1950	no
261 211	OMAHA	1404	Steel	X	56,000	2,352,000	1950	no
262 211	OMAHA	1405	Steel	N	56,000	2,352,000	1950	no
263 211	OMAHA	1406	Steel	Q	56,000	2,352,000	1950	no
264 211	OMAHA	1407	Steel	Q	56,000	2,352,000	1950	no
265 211	OMAHA	1408	Steel	N	56,000	2,352,000	1950	no
266 211	OMAHA	1411	Steel	X	56,000	2,352,000	1950	no
267 211	OMAHA	1412	Steel	N	56,000	2,352,000	1950	no
268 211	OMAHA	1503	Steel	X5	67,000	2,814,000	1974	no
269 21200	SIOUX CITY	103	Steel	E	1,749	73,458	1946	no
270 21200	SIOUX CITY	104	Steel	E	1,749	73,458	1946	no
271 21200	SIOUX CITY	105	Steel	N9	1,749	73,458	1946	no
272 21200	SIOUX CITY	106	Steel	O	1,749	73,458	1946	no
273 21200	SIOUX CITY	108	Steel	E	1,749	73,458	1946	no
274 21200	SIOUX CITY	109	Steel	E	1,749	73,458	1946	no
275 21200	SIOUX CITY	319	Steel	O	260	10,920	1992	no, water
276 21200	SIOUX CITY	411	Steel	X	1,127	47,334	1946	no
277 21200	SIOUX CITY	503	Steel	D	10,912	458,304	1946	no
278 21200	SIOUX CITY	504	Steel	D	10,914	458,388	1946	no
279 21200	SIOUX CITY	505	Steel	D	10,910	458,220	1946	no
280 21200	SIOUX CITY	506	Steel	Q	10,913	458,346	1946	no
281 21200	SIOUX CITY	514	Steel	X	10,913	458,346	1946	no
282 21200	SIOUX CITY	515	Steel	Q	10,913	458,346	1946	no
283 21200	SIOUX CITY	516	Steel	Y	10,912	458,304	1946	no
284 21200	SIOUX CITY	518	Steel	Q	10,913	458,346	1946	no
285 21200	SIOUX CITY	212-130	Steel	additive	143	6,000	post 1995	no, WPL Gasoline additive
286 21200	SIOUX CITY	212-132	Steel	additive	71	3,000	post 1995	no, WPL PPD
287 21200	SIOUX CITY	212-011	Steel	*Amoco additive*	48	2,000	post 1995	no, Amoco fuel oil additive
288 21200	SIOUX CITY	212-061	Steel	*Koch additive*	60	2,500	post 1995	no, Koch Fuel Oil additive
289 21200	SIOUX CITY	212-110	Steel	*Texaco additive*	48	2,000	post 1995	no, Texaco Gasoline additive
290 21200	SIOUX CITY	212-010	Steel	*Amoco additive*	48	2,000	post 1995	no, Amoco Gasoline additive
291 20300	WATERLOO	203-130	Steel	additive	189	7,938	NA	no, WPL IVD
292 20300	WATERLOO	203-132	Steel	additive	98	4,116	NA	no, WPL Cold Flow Improver
293 20300	WATERLOO	203-061	Steel	*Koch additive*	72	3,024	NA	no, Koch
294 20300	WATERLOO	203-021	Steel	*Cenex additive*	60	2,520	NA	no, Cenex
295 20300	WATERLOO	203-050	Steel	*Growmark additive*	52	2,184	NA	no, Growmark
296 20300	WATERLOO	203-110	Steel	*Texaco additive*	99	4,158	NA	no, Texaco
297 20300	WATERLOO	203-080	Steel	*Mobil additive*	61	2,562	NA	no, Mobil
298 20300	WATERLOO	783	Steel	N	28,420	1,193,640	1960	no
299 20300	WATERLOO	784	Steel	E	28,415	1,193,430	1960	no
300 20300	WATERLOO	1392	Steel	X	42,236	1,773,912	1960	no
301 20300	WATERLOO	1393	Steel	Y	42,225	1,773,450	1960	no
302 20300	WATERLOO	1417	Steel	N	53,712	2,255,904	1960	no
303 20300	WATERLOO	1418	Steel	N	53,693	2,255,106	1960	no
304 20300	WATERLOO	1419	Steel	X	52,153	2,190,426	1960	no
305 20300	WATERLOO	1420	Steel	X	52,155	2,190,510	1960	no
306 20300	WATERLOO	203-1	Steel	O	60	2,520	NA	no, water recovery
	TOTAL	145			2,388,660	100,323,714		