

Inspection Output (IOR)

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Inspection Information

Inspection Name	BP Cherry Point--WA Intrastate Laterals Liquid IMP	Operator(s)	BP PIPELINE (NORTH AMERICA) INC. (31189) OLYMPIC PIPE LINE COMPANY (30781)	Plan Submitted	02/06/2017
Status	PLANNED	Lead	Dennis Ritter	Plan Approval	02/07/2017 by Joe Subsits
Start Year	2017	Supervisor	Joe Subsits	All Activity Start	08/07/2017
System Type	HL	Director	Sean Mayo	All Activity End	08/11/2017
Protocol Set ID	HL.2016.02			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Summary:

Hazardous liquid integrity management program inspection.

AFO days: Pre-inspection	4
Field	5
Post	4

Exit Interview held at BP HQ in Chicago 8/10/17 at 4pm. John Newhouse, Jim Bruen, Mike Sanders present for BP. Summarized inspection. There was one follow up noted below; no other findings or issues noted.

Follow up item:

2016 Vancouver DF W2 line had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50 in Feb 2016, March 2016 contacted Tesoro to depole. Couldn't schedule until August 2016. After depole, decided to replace rectifier. OPL replaced the rectifier in 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is planning to replace ground bed in 2017. No probable violation as met WAC 480-75-510 criteria of initiating corrective action within 90 days of observing deficiency.

Should follow up on this in 2018 to ensure new ground bed is installed and it corrected the problem.

This is a program inspection of BP/Olympic Pipeline's Integrity Management Plan. BP procedures, practices and the Integrity Management Plan were reviewed records and some O&M records to determine if BP/Olympic is effectively carrying out their integrity program. No field work was anticipated or completed with this inspection. This inspection focused on whether records supported the procedural requirements of BP's Hazardous Liquid Integrity Management Plan. This inspection was for intrastate pipelines, operated by BP in WA--however, the Liquid IMP is the same for all liquid lines. No deficiencies were found during the inspection of BP's Liquid IMP. Records supported the decisions and current implementation of the program for the WA State intrastate lines. O&M, P&M, Emergency Response and Training, and CP records for each line were reviewed during the inspection in Chicago, IL HQ. NOTE: **No field inspections were conducted with this HQ program audit--therefore all field related questions are "NC".**

- BP Cherry Point Crude line--24" , 5 mile line from Kinder Morgan delivery to the Cherry Point Refinery;
- Cherry Point Butane HVL line--6" , 5 mile line from BP Cherry Point Refinery to AltaGas Storage Facility;
- Olympic Pipe Line intrastate Laterals:
 - Seattle-12", 12.83 mile line from Renton Station to Seattle DF
 - SeaTac-12", 5.54 mile line from Renton Station to SeaTac Airport
 - Tacoma-8", 3.72 mile line from Tacoma Junction to Tacoma DF
 - Vancouver-12", 4.4 mile line from Vancouver Junction to Vancouver DF
 - Olympia -6", 14.9 miles (note this line is out of service and idled with nitrogen since 2009. it also has a section removed at MP 12.2.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	BP Cherry Point	BP Cherry Point crude & butane lines	other	BP Cherry Pt	Offshore GOM Crosses Nav. CO2 Biofuels	174	174	174	174	100.0%
2.	Intrastate Laterals	OPL Intrastate Laterals	other	Olympic Intrastate Laterals	Offshore GOM HVL CO2 Biofuels	--	--	--	--	--

a. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	BP Cherry Point	HL IM, Core	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail	
2.	BP Cherry Point	n/a	EP.EPO	P, R, O, S	Detail	
3.	BP Cherry Point	n/a	MO.LOMOP	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Field	--	08/07/2017	08/11/2017	n/a	all planned questions	all assets	O	26	26	26	26	100.0%
2.	Records	--	08/07/2017	08/11/2017	n/a	all planned questions	all assets	R	96	96	96	96	100.0%
3.	procedures only	--	08/07/2017	08/11/2017	n/a	all planned questions	all assets	P	52	52	52	52	100.0%

- a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
- b. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Inspection Scoping	Scoping Butane and Crude Lines	COMPLETED	09/01/2017	Records	BP Cherry Point
2.	Inspection Scoping	OPL Laterals	COMPLETED	09/01/2017	Records	Intrastate Laterals

Results (Unsat, Concern values, 2 results)

5 (instead of 2) results are listed due to re-presentation of questions in more than one sub-group.

TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection

1. Question Result, ID, References	Concern, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR, TD.CPEXPOSED)
Question Text	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?
Assets Covered	Intrastate Laterals
Result Issue Summary	2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50. OPL replaced the rectifier 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is now replacing ground bed in summer 2017.
Result Notes	<p>Vancouver to Vancouver DF 12"</p> <p>2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50 in Feb 2016, March 2016 contacted Tesoro to depole. Couldn't schedule until August 2016. After depole, decided to replace rectifier. OPL replaced the rectifier in 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is planning to replace ground bed in 2017.</p> <p>Tank 102 Seattle Lateral Internal API 653 Out of Service Inspection 6/19/15. Two "B" findings, which require some action by BP. Both repaired. Next out of service inspection scheduled for 2035.</p> <p>Tank 107 Vancouver Lateral Internal API 653 Out of Service Inspection 5/10/16. There were 10 "B" findings which require some action by BP. All 10 were adequately addressed in the report Inspection Package Repairs E&M Tank Program Tank 107 5/11/16.</p> <p>Reviewed monthly API 653 inspections (in lieu of the annual visual check) for Tanks 102, 103 and 107.</p>

TD.CP: External Corrosion - Cathodic Protection

2. Question Result, ID, References	Concern, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CPBO, TD.CPMONITOR, TD.CPEXPOSED)
Question Text	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?
Assets Covered	Intrastate Laterals
Result Issue Summary	2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50. OPL replaced the rectifier 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is now replacing ground bed in summer 2017.
Result Notes	<p>Vancouver to Vancouver DF 12"</p> <p>2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50 in Feb 2016, March 2016 contacted Tesoro to depole. Couldn't schedule until August 2016. After</p>

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Tank 102 Seattle Lateral Internal API 653 Out of Service Inspection 6/19/15. Two "B" findings, which require some action by BP. Both repaired. Next out of service inspection scheduled for 2035.

Tank 107 Vancouver Lateral Internal API 653 Out of Service Inspection 5/10/16. There were 10 "B" findings which require some action by BP. All 10 were adequately addressed in the report Inspection Package Repairs E&M Tank Program Tank 107 5/11/16.

Reviewed monthly API 653 inspections (in lieu of the annual visual check) for Tanks 102, 103 and 107.

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

3. Question Result, ID, References	Concern, TD.CPMONITOR.TEST.R, 195.589(c) (195.573(a)(1))
Question Text	<i>Do records document required monitoring tests have occurred and that adequate cathodic protection levels exist?</i>
Assets Covered	Intrastate Laterals
Result Issue Summary	2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50. OPL replaced the rectifier in 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is planning to replace ground bed in 2017.
Result Notes	<p>Reviewed 2016 and 2017 annual reads for the following:</p> <p>Renton to Seattle DF 12"</p> <p>Renton to Seatac DF 12"</p> <p>Tacoma to Tacoma DF 8"</p> <p>Vancouver to Vancouver DF 12"</p> <p>2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50 in Feb 2016, March 2016 contacted Tesoro to depole. Couldn't schedule until August 2016. After depole, decided to replace rectifier. OPL replaced the rectifier in 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is planning to replace ground bed in 2017.</p> <p>2016, 2017--BP Cherry Point 24" Crude and 6" Butane</p>
4. Question Result, ID, References	Concern, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CPBO, TD.CP, TD.CPEXPOSED)
Question Text	<i>Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?</i>
Assets Covered	Intrastate Laterals
Result Issue Summary	2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50. OPL replaced the rectifier 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is now replacing ground bed in summer 2017.
Result Notes	<p>Vancouver to Vancouver DF 12"</p> <p>2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50 in Feb 2016, March 2016 contacted Tesoro to depole. Couldn't schedule until August 2016. After depole, decided to replace rectifier. OPL replaced the rectifier in 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is planning to replace ground bed in 2017.</p>

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Tank 107 Vancouver Lateral Internal API 653 Out of Service Inspection 5/10/16. There were 10 "B" findings which require some action by BP. All 10 were adequately addressed in the report Inspection Package Repairs E&M Tank Program Tank 107 5/11/16.

Reviewed monthly API 653 inspections (in lieu of the annual visual check) for Tanks 102, 103 and 107.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

5. Question Result, ID, References	Concern, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CPBO, TD.CP, TD.CPMONITOR)
Question Text	<i>Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?</i>
Assets Covered	Intrastate Laterals
Result Issue Summary	2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50. OPL replaced the rectifier 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is now replacing ground bed in summer 2017.
Result Notes	<p>Vancouver to Vancouver DF 12"</p> <p>2016 Vancouver DF had low reads at the following stations: MP 6+00, 6+50,7+00, 7+50 in Feb 2016, March 2016 contacted Tesoro to depole. Couldn't schedule until August 2016. After depole, decided to replace rectifier. OPL replaced the rectifier in 2/2/2017. Annual reads on 2/8/2017 still failed to meet criteria. OPL is planning to replace ground bed in 2017.</p> <p>Tank 102 Seattle Lateral Internal API 653 Out of Service Inspection 6/19/15. Two "B" findings, which require some action by BP. Both repaired. Next out of service inspection scheduled for 2035.</p> <p>Tank 107 Vancouver Lateral Internal API 653 Out of Service Inspection 5/10/16. There were 10 "B" findings which require some action by BP. All 10 were adequately addressed in the report Inspection Package Repairs E&M Tank Program Tank 107 5/11/16.</p> <p>Reviewed monthly API 653 inspections (in lieu of the annual visual check) for Tanks 102, 103 and 107.</p>

Report Parameters: Results: Unsat,Concern

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