

Form A- Annual Review 8443

UTC Standard Annual Review Inspection Report
Intrastate Operators
FORM A: Annual Review

Inspector and Operator Information

Inspection ID 8443	Inspection Link 8443	Inspector - Lead Darren Tinnerstet	Inspector - Assist
Operator Ferndale Pipeline System	Unit Ferndale Pipeline System	Records Location - City & State Ferndale, WA	
Inspection Start Date 11-02-2022	Inspection Exit Interview Date 11-02-2022	Engineer Submit Date 11-02-2022	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

Inspection Scope and Summary

The Annual Review inspection was conducted in person at the Renton headquarters. There were no findings from the review.

Facilities visited and Total AFOD

11/2/2022 records review at Renton headquarters = 1 AFOD

Summary of Significant Findings (DO NOT Discuss Enforcement options)

There were no findings from the inspection

Primary Operator contacts and/or participants

Jim Bruen DOT Senior Compliance Advisor

Jim Fraley DOT Compliance Advisor

Operator executive contact and mailing address for any official correspondence

John D'Andrea, Head of North American Operations and HSSE

BP Pipelines of North America

M.C. 9S 30S Wacker Drive,

Chicago, Illinois 60606

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
21	1,3,8,9,10,12,13,14,15,17,24,25,26,27,28,29,30,31,32,37,	0	
Unsatisfactory Responses	Unsatisfactory List		
0			
Area of Concern Responses	Area of Concern List		
0			
Not Applicable Responses	Not Applicable List		
17	4,5,6,7,16,18,19,20,21,22,23,35,39,40,42,43,44		
Yes Responses	Yes List	No Responses	No List
1	36,	3	34,38,41
Not Checked / Evaluated Responses	Not Checked / Evaluated List		
0			

**If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Operator	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
No Crew Inspection records found							

Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
No Facility Inspection records found						

Scheduled Inspection History

Annual Review Inspection History

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Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
Ferndale Pipeline System (12 Inspection records)								
2021	Ferndale Pipeline System	Ferndale Pipeline System	8076	Standard Comprehensive - GT	Complete	06-28-2021	06-16-2024	Documents
2021	Ferndale Pipeline System	Ferndale Pipeline System	8088	TIMP - Gas Transmission Integrity Management	Complete	03-08-2021	03-03-2024	Documents
2021	Ferndale Pipeline System	Ferndale Pipeline System	8153	CRM - GAS	Pending			Documents
2021	Ferndale Pipeline System	Ferndale Pipeline System	8360	Standard - Annual Review	Complete	06-23-2021	06-17-2022	Documents
2020	Ferndale Pipeline System	Ferndale Pipeline System	8089	OM PPR GAS - Operations & Maintenance, Plans & Procedures Review	Complete	04-19-2021	01-29-2025	Documents
2019	Ferndale Pipeline System	Ferndale Pipeline System	7844	OQ - Operator Qualification	Complete	03-06-2019	01-24-2023	Documents
2018	Ferndale Pipeline System	Ferndale Pipeline System	7573	Standard Comprehensive - GT	Complete	08-31-2018	08-16-2021	Documents
2017	Ferndale Pipeline System	Ferndale Pipeline System	7235	TIMP - Gas Transmission Integrity Management	Complete	11-08-2017	08-23-2020	Documents
2016	Ferndale Pipeline System	Ferndale Pipeline System	6767	CRM - GAS	Complete	11-09-2016	10-13-2020	Documents
2015	Ferndale Pipeline System	Ferndale Pipeline System	6204	PA - Public Awareness	Complete	11-09-2015	10-22-2019	Documents
2015	Ferndale Pipeline System	Ferndale Pipeline System	6220	Standard Comprehensive - GT	Complete	08-27-2015	07-23-2018	Documents
2015	Ferndale Pipeline System	Ferndale Pipeline System	6221	OM PPR GAS - Operations & Maintenance, Plans & Procedures Review	Complete	11-09-2015	10-22-2019	Documents

GAS System Operations History

Annual Report - Miles of Main

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No Report records found					

Annual Report GAS Transmission Miles

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
2020	36.2	9
2019	36.2	63.4
2018	36.2	0
2015	36.2	0
2016	36.2	0
2017	36.2	0
TOT	217.2	72.4

Annual Report - Leaks

Year	Operator	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
No Report records found						

Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
No Report records found							

HL System Operations History

HL Annual Report - Miles of Pipe by Decade

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre-20s	1920-1929	1930-1939	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989
No Report records found												

HL Annual Report - HL Miles / HCAs

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
No Report records found								

HL Annual Report - Breakout Tanks

YEAR	Operator	Commodity Group	Crude Oil #5	Refined (nor HVL #5)
No Report records found				

ANNUAL REPORT: ACCURACY/TRENDS

Question #1.

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.

1. Result

Satisfactory

1. Notes

Reviewed 2021 annual report (submitted on 3/10/2022. No trends or accuracy issues noted.

Access to Complete Distribution Annual Report

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No Report records found					

Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
Ferndale Pipeline System (6 Report records)			
2020	Ferndale Pipeline System	Natural Gas	36.2
2019	Ferndale Pipeline System	Natural Gas	36.2
2018	Ferndale Pipeline System	Natural Gas	36.2
2015	Ferndale Pipeline System	Natural Gas	36.2
2016	Ferndale Pipeline System	Natural Gas	36.2
2017	Ferndale Pipeline System	Natural Gas	36.2

Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group
No Report records found		

DAMAGE PREVENTION

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates
No Damages records found													

DIRT data on mismarks for prior year

Damage Cause	Number of Reports
No Report records found	

DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

SubmitCompanyID - UTCfinalName	Number of Reports
No Report records found	

Question #2.

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?
http://Yes

Q2.b. Is the annual report damages root cause information complete and accurate?
NA

Q2.c. Does the operator have a process to evaluate practices not sufficient" category?
Yes. OMER Manual Damage Prevention Program - S

Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?
Yes. Re-evaluation through OQ process . OQ ROW 03

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?
Yes. Three in house locators. Reviewed OQ's for Charles Groves, Kyle Meeker, Kevin Washington

Q2.f. Is the operator appropriately requalifying loc deficiencies?
Yes. Locators are re-qualified every 3 years. No inst

Q2.g. What is the number of damages resulting from mismarks?
0

Q2.h. What is the number of damages resulting from not locating within the time requirements?
0

Q2.i. Is the operator appropriately addressing disc excavation damage?
NA

Q2.j. Are mapping corrections timely and according to written procedures?
NA. No mapping corrections have been needed or discovered.

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient" ?
Yes. OMER Manual Damage Prevention Program - Section 11

Q2.l. Is the operator appropriately focusing damage address the causes of excavation damage?
Yes. BP Public Awareness Program - Table 7 (Releva

2. Notes

No damage prevention related issues. No damages or dig ins were reported for the year 2021.

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

3. Result

Satisfactory

3. Notes

Reviewed NPMS submitted 3/3/2022.

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Results

Not Applicable

4. Notes

No federal reportable incidents during 2021.

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No Incident Notification records found									

Question #5.

5. Result

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of recurrence? **Not Applicable**

5. Notes

No accidents or failures for 2021.

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
No Incident Notification records found						

6. Result
Not Applicable

6. Notes

No incident reports for 2021.

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No Incident Notification records found							

7. Result
Not Applicable

7. Notes

No reportable or unreportable SRC during 2021.

Question #8.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

8. Notes

Two total AOC's for 2021:

- 1) Drop in Pressure - determined to be due to increase in customer demand on Enbridge side.
- 2) Volume miscalculation - due to meter issue at Sumas Station.

8. Result
Satisfactory

O&M & EMERGENCY PROGRAMS

Question #9.

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

9. Result

Satisfactory

9. Notes

Last OM inspection was in 2021. Next review is scheduled for 2025.

Reviewed change log for documented changes. Main changes were updates for Section 114 emission requirements.

Question #10.

If changes to the O&M were made, are changes acceptable?

10. Result

Satisfactory

10. Notes

No issues found.

Question #11.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

11. Notes

Reviewed Facility Response Plan for changes. Main changes were for personnel updates.

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Satisfactory

12. Notes

No issues.

INTEGRITY MANAGEMENT PROGRAMS

Question #13

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

13. Result
Satisfactory

13. Notes

Reviewed TIMP plan.

One change to Section 1(c)(1) - changed HCA computer application to PipelineOffice Gas HAC (Geonamics).

Question #14.

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

14. Result
Satisfactory

14. Notes

Reviewed 2021 IMP Annual Summary.

No assessment work was scheduled for completion in 2021. Baseline assessments were completed in 2005/2006. Both pipeline segments continue to have 7 year re-assessment intervals.

Question #15

Are IMP program changes acceptable?

15. Result
Satisfactory

15. Notes

No issues with IMP changes.

Question #16

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

16. Results

Not
Applicable

16. Notes

No assessment / repair work was conducted or required during 2021.

Question #17

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

17. Results

Satisfactory

17. Notes

Per last standard inspection in 2021, there are 5 HCA areas on system (4 on 16 inch main line and 1 on 8 inch Intalco line).

UTC conducted TIMP inspection during 2021. There were no findings during this inspection.

Reviewed HCA maps. HCA changed from 1.97 to 2.11 miles with switch to new HCA software. Additional HCA's were small incremental changes, nothing of significance.

Question #18

What assessment work is planned for the upcoming year?

18. Results

Not
Applicable

18. Notes

No assessment for upcoming year. Next ILL run is in 2026-2027.

Question #19

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

19. Results

Not
Applicable

19. Notes

Transmission operator.

Question #20

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

20. Results

Not
Applicable

20. Notes

Transmission operator.

Question #21

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

21. Results

Not
Applicable

21. Notes

Transmission operator.

Question #22

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

22. Results

Not
Applicable

22. Notes

Transmission operator.

Question #23

What DIMP remediation work is anticipated for upcoming year?

23. Results

Not
Applicable

23. Notes

Transmission operator.

▾ OQ PROGRAM

Question #24

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

24. Results

Satisfactory

24. Notes

Reviewed OQ program.

12/14/2021 - 3 year effectiveness review - No findings or plan changes.

12/14/2021- Annual procedure effectiveness review. No findings or plan changes.

Question #25

Are the OQ plan updates satisfactory?

25. Results

Satisfactory

25. Notes

No updates were completed or required for 2021.

Question #26

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Results

Satisfactory

26. Notes

Reviewed OQ records for operator maintenance personnel.

Kevin Washington

Charles Groves

▾ PUBLIC AWARENESS PROGRAM

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Results

Satisfactory

27. Notes

Reviewed PA program. Revised 8/4/2021. No significant changes were made.

Question #28

Are changes to the PA program satisfactory?

28. Results

Satisfactory

28. Notes

Records show last PA audit was done in 2015. Operator stated that Lex did PA in 2020 (8091). Checked database and 8091 was a PA for BP North America. Need to make sure this cross references with Ferndale Pipeline System.

CONTROL ROOM PROGRAM

Question #29

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Results

Satisfactory

29. Notes

Last CRM inspection conducted jointly with PHMSA in 2021. Results are still pending and being worked on with PHMSA.

Reviewed OMER and CRM manual updates. No significant changes or updates.

Question #30

Are the CRM program changes satisfactory?

30. Results

Satisfactory

30. Notes

No issues.

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

Is the operator developing and implementing an API 1173 Safety Management System?

31. Results

Satisfactory

31. Notes

Operating Management System (OMS) is a BP specific safety management system.

Reviewed USPL LOMS - Section 2.2 - USPL leadership commitment to API RP 1173 Pipeline Safety Management System.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Results

Satisfactory

32. Notes

Only one unit.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	UTC Unit ID	UTC Operator ID
Ferndale Pipeline System (1 Unit)					
Ferndale Pipeline System	Transmission	Intrastate	Gas	91	116

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.D How to get additional information ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.L Integrity Management Programs

33. Notes

Reviewed BP public webpage www.bppipelines.com.

No maps of Ferndale Pipeline System are available on the public website. Discussed with operator that it would be very beneficial to add link to NPMS submission information at the least for public knowledge.

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Results

NO

34. Notes

Operator does not cross waterways with scour potential. Operator is aware of ADB.

Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results

Not Applicable

35. Notes

Operator does not cross waterways with scout potential. Operator is aware of ADB.

Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Results

YES

36. Notes

Gas OMER Book 2 - Section 5.69.01

Section L - Earthquakes.

Provides magnitude table. Any confirmed magnitudes above 5.0 within 30 miles of pipeline ROW will require immediate normal shutdown.

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results

Satisfactory

37. Notes

No issues or concerns.

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Results

NO

38. Notes

Transmission operator.

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Results

Not Applicable

39. Notes

Transmission operator.

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Results

Not Applicable

40. Notes

Transmission operator.

Question #41

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Results

NO

41. Notes

Transmission operator.

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02

ADB 2020-02 Low Pressure Systems

42. Results

Not Applicable

42. Notes

Transmission operator.

Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

43. Results

Not Applicable

43. Notes

Transmission operator.

Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

44. Results

Not Applicable

44. Notes

Transmission operator.

☰ SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.