

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Inspection Checklist, Cover Letter and Field Report, IMP and OQ Field Validation Forms** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/ Docket Number	7842		
Inspector Name & Submit Date	Anthony Dorrough 04/19/2019		
Chief Engineer Name & Review Date	Joe Subsits, 5/9/2019		
Operator Information			
Name of Operator:	BP Pipelines North America	OPID #:	31189
Name of Unit(s):	BP Cherry Point Refinery		
Records Location:	Renton, WA		
Date(s) of Last Review:	August 22-24 2016	Inspection Date(s)	February 13-14, March 26-27 2019

<p>Inspection Summary:</p> <p>This inspection consisted of a plan and procedure review as well as a field inspection. There were no areas of concern or probable violations.</p>

HQ Address: BP Pipelines (North America) Inc. US Pipelines & Logistics 150 W. Warrenville Road Naperville, IL 60563		System/Unit Address: BP Cherry Point Refinery 4519 Grandview Road, Blaine, WA 98213	
Co. Official:	Gerald Maret, President	Phone No.:	None provided
Phone No.:	(630) 730-2866 (mobile)	Fax No.:	None provided
Fax No.:		Emergency Phone No.:	(888) 271-8880 Renton Control Center
Emergency Phone No.:			(800) 548-6482 Tulsa, OK Control Center
Persons Interviewed	Title	Phone No.	
John Newhouse	DOT Compliance Coordinator	(847) 714-7610	

Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Comments:
 See also BP HQ Annual Review

UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.
 (check one below and enter appropriate date)

Team inspection was performed (Within the past five years.) or,	Date:	8/22-24/2016
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	
Any revisions to O&M manual since last review? Yes No If yes, review revisions made.		

Comments:

REPORTING						
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? No changes	X			
2.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted?	X			
3.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction N/A- No new lines			X	
4.	480-75-620	Was MOP changed based on hydrotest? Report submitted? N/A-No changes			X	
5.	480-75-630(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours of discovery) for events which results in; a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection. N/A- No reports			X	
6.	480-75-630(2)	Written reports to the commission within 30 calendar days of the incident. The report must include the following: a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; (b) The extent of injuries and damage; (c) A description of the incident including date, time, and place; (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident; (e) The date and time the pipeline returns to safe operations; and (f) The date, time, and type of any temporary or permanent repair. N/A- No reports			X	
7.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes. N/A- No Accidents			X	

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8.	195.442(c)(6)	Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? N/A- No records				X	
9.	480-75-630(3)	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline. N/A- No emergency situations reported				X	
10.	49 CFR 195.402	Did the operator follow written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? ---Reviewed tickets from 2018 thru 2019	X				
11.	442(c)(6)	Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies?	X				
12.	480-75-630(4)	Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission’s Virtual DIRT system or on-line damage reporting form)					
13.	480-75-630(4)(a)	<ul style="list-style-type: none"> Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) N/A – Nothing to report 	X				
14.	480-75-630(4)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed? N/A	X				
15.	480-75-630(4)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? N/A Note: Records maintained for two years and made available to the commission upon request.	X				
16.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? N/A					
17.	480-75-630(5)(a)	Notification requirements for excavators under RCW 19.122.050(1) N/A	X				
18.	480-75-630(5)(b)	A description of the excavator’s responsibilities for reporting damages under RCW 19.122.053; and N/A	X				
19.	480-75-630(5)(c)	Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.	X				
20.	480-75-630(6)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (630(6)(a) A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b) N/A 	X				
21.	Damage Prevention (Operator Internal Performance Measures PHMSA – State Program Evaluation Questions	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)	X				
22.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? No longer have contracted locators	X				
23.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	X				
24.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X				
25.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. P-195.442 – Damage Prevention	X				
26.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X				
27.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? Verified	X				

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Comments:

OPERATION & MAINTENANCE			S	U	NA	NC
28.	480-75-620	Change in MOP? Changed based on hydrotest? <i>N/A- No change</i>			X	
29.	480-75-640	Depth of cover surveys and mitigation	X			
30.	480-75-500	Pipe movement study per API 1117 <i>N/A- Not needed</i>			X	
31.	480-75-300 (3)	Leak detection and alarm records Verified	X			
32.	480-75-320	Surge analysis done?	X			

CORROSION CONTROL			S	U	NA	NC
33.	480-75-510	Corrosion remediation within 90 days - No low reads	X			

Comments:

FIELD REVIEW			S	U	N/A	N/C
34.	480-75-540	Markers at exposed areas	X			
35.	480-75-320	Relief Device set at or below MOP	X			
36.	480-75-300	Leak Detection – 8% in 15 Minutes	X			
37.	480-75-300	Leak detection at flow and no flow conditions	X			
38.	480-75-330	Do Breakout Tanks have independent overfill alarms?	X			

Comments:

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EXIT INTERVIEW

Exit interview conducted? Issues addressed: There were no areas of concern or probable violations.	Date:	2/12/2019
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PHMSA Advisory Bulletins

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2016-07	Dec 9, 16	Safeguarding and Securing Pipelines From Unauthorized Access
ADB-2016-04	Jun 21, 16	Ineffective Protection, Detection, and Mitigation of Corrosion Resulting From Insulated Coatings on Buried Pipelines
ADB-2016-01	Jan 19, 16	Potential for Damage to Pipeline Facilities Caused by Flooding, River Scour, and Channel Migration
ADB-12-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-12-09	Oct 11, 12	Communication During Emergency Situations
ADB-12-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB -12-06	May 7, 12	Verification of Records Establishing MAOP and MOP.
ADB-12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB -12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation

For more PHMSA Advisory Bulletins, go to <https://www.phmsa.dot.gov/regulations-fr/notices>