



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent Via Email*

December 13, 2023

John D'Andrea  
Head of North American Operations and HSSE  
Olympic Pipeline Company  
M.C. 9S 30S Wacker Drive  
Chicago, IL 60606

**RE: 2023 Hazardous Liquid Standard Inspection – Olympic Pipeline Company – Intrastate  
Laterals – (Insp. No. 8618)**

Dear Mr. D'Andrea:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Comprehensive Inspection of Olympic Pipeline Company's Intrastate Laterals from September 11, 2023, to December 6, 2023. This inspection included a records review and inspection of pipeline facilities. Due to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) integrated inspection of the Olympic Pipeline mainline, shared asset and programmatic elements were conducted jointly and required additional time.

Our inspection indicates two area(s) of concern as noted in the enclosed report. As Olympic Pipeline Company has already completed the remediation of both issues, we will consider these concerns closed and no response to this letter is necessary.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 402-0066. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Scott Rukke  
Pipeline Safety Director

cc: Tim Smith, Compliance Manager, Olympic  
Jim Bruen, DOT Senior Compliance Advisor, Olympic  
Jim Fraley, DOT Compliance Advisor, Olympic

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**UTILITIES AND TRANSPORTATION COMMISSION**  
**2023 Hazardous Liquid Pipeline Safety Inspection**  
**Olympic Pipeline Company – Intrastate Laterals**

The following areas of concern of Title 49 CFR Part 195 and WAC 480-75 were noted as a result of the 2023 inspection of the Olympic Pipeline Company's (OPL) Intrastate Laterals. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, and field inspection of the pipeline facilities.

**AREAS OF CONCERN**

**1. WAC 480-75-510 Remedial Action for Corrosion Deficiencies.**

*Pipeline companies must initiate remedial action as necessary to correct any deficiency observed during corrosion monitoring, within ninety days after the pipeline company detects the deficiency.*

**Finding(s):**

During the field inspection of OPL assets, pipe to soil potential (PSP) readings were taken at the Vancouver Delivery Facility (DF) to confirm the cathodic protection system was providing adequate protection of buried pipeline assets. There were two readings which did not meet Procedure #P-195.551.VII of a negative polarized potential of at least 850 mV relative to a Cu/CuSO<sub>4</sub> electrode or a minimum of 100mV of cathodic polarization between tank and the Cu/CUS<sub>04</sub> reference electrode.

- 1) Tank 107 Vancouver DF. The west side reading was -1667 mV ON, -735mV OFF (IR free read). The native read for this location was -677mV. It did not meet protection criteria.
- 2) Inlet line to Vancouver DF at isolation kit. The reading from the pipeline side was -1772mV ON, -1247mv OFF; the reading on the facility side was -1773 mv ON, -1246mV OFF. The facility is not isolated.

WAC 480-75-510 requires remediation of corrosion monitoring deficiencies within 90 days. OPL completed remediation of both deficiencies as follows:

- 1) Tank 107. New depolarized readings (native) were taken on September 14, 2023. The new PSP reading taken was -735 mV. The new depolarized reading was -514 mV. The protection criteria is being met.
- 2) OPL's solution to the isolation issue was to bond across the kit and effectively eliminate isolation. This was completed on September 20, 2023.