

11-15-12P03:08 RCVD

**POST INSPECTION MEMORANDUM****Inspector:** Al Jones, UTC**Reviewed:** Joe Subsits, UTC, 9/27/2012**Peer Reviewed:** RR**Follow-Up Enforcement:** **No Violation** ✓~~PCP\*~~ ~~PCO\*~~ ~~NOA~~ ~~WL~~ ~~LOC~~**Director Approval\*** Chris Hoidal*CH 12/17/12***Date:** September 28, 2012**Operator Inspected:** Olympic Pipe Line Company    **OPID:** 30781    **Region:** Western**Unit Address:**2201 Lind Ave. SW, Suite 270  
Renton, WA 98055

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State of Washington  
UTC  
Pipeline Safety Program**Unit Inspected:** Olympic Pipe Line - NORTH**Unit ID:** 925**Unit Type:** Interstate Hazardous Liquid**Inspection Type:** I-07 – IMP Field Verification, O-07 – Integrity Management Follow-up**Record Location:** Renton, WA**Inspection Dates:** September 17 - 19, 2012**AFOD:** (I-07=1, O-07=0.5)**SMART Activity Number:** 14/587**Operator Contact:** Jim Bruen**Phone:** 630 536-2535    **Fax:** 630 420-5519    **Emergency:** 888-271-8880**Unit Description:**

The North Unit transports refined petroleum products from the following locations:

Cherry Point line at BP Refinery via:

- 5 mile, 16" line from Cherry Point to Ferndale Pump Station, and
- 37.5 miles, 16" line from Ferndale Pump Station to Bayview Terminal, and
- 1.2 miles, 16" line from Bayview Terminal to Allen Station.

Anacortes lines at Tosoro and Shell Refineries via:

- 9 miles, 16" line from Anacortes to Bayview Terminal, and
- 1.2 miles, 16" line from Bayview Terminal to Allen Station.

Renton line via:

- 75.5 miles, 20" line from Allen Station to Renton Station.

Renton and Woodinville lines via:

- 49.2 miles, 16" line from Allen Station to Woodinville Station, and
- 26.3 miles, 16" line from Woodinville Station to Renton Station.

The North Unit HCA affected mileage includes:  
 46% high population area,  
 50% other population area,  
 52% drinking water USA,  
 58% ecological resources USA, and  
 18% commercially navigable waterway

**Facilities Inspected:**

The North Unit completed inline inspection (ILI) reports for 2009 and 2010 were reviewed for the lines identified in the Unit Description including documentation for pipe anomaly evaluation and repairs. Field ROW condition at HCA's and wetlands were inspected and reviewed 2011 annual CP values at:

MP 105.7 – HCA in the Newcastle in King County where a ground fault current damaged the 16” pipeline creating two arc burns. The arc burns were discovered August 6, 2009 and a repair sleeve installed August 13, 2009. A 20’ section of the damaged pipe was replaced June 23, 2010. The largest arc burn was 69% wall loss, 0.79” in length, 1.97” in width, 0.215” in depth, and located at the 1:17 clock position.

MP 67.469 – HCA in Snohomish County where 29% wall loss from corrosion was repaired on the 20” pipeline using three clock springs near a girth weld location. Clock springs were placed on each side of the girth weld and the third clock spring bridged across the girth weld. The pipe is API X-52, HF-ERW, nominal 0.250” wt, and the pipeline was built in 1972. The anomaly was discovered during the April 2009 ILI.

MP 63 – HCA in Snohomish County where Quilceda Creek crosses the 16” and 20” pipelines. The lines were lowered, covered with rock shield material, and river weight caps placed over the top of pipe.

**Persons Interviewed:**

Persons Interviewed	Titles	Phone No.
Kurt Hayashida	NW E&M Team Leader	425-226-8881
Jim Bruen	DOT Compliance Advisor	630-779-6994
Nicholas Kitzmiller	District Corrosion Specialist	425-226-8883

**Probable Violations/Concerns:**

There were no probable violations found during the inspection.

**Follow up on the history of prior offenses that are still open:**

<p><b>Prior Offenses</b>          (for the past 5 years)</p>
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CPF #	What type of open enforcement action(s)?	Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)

**Recommendations:**

Continue to inspect this unit every other year.

**Comments:**

**Attachments:**

- PHMSA Form 19 – Question Set (IA Equivalent)
- Exhibit A:
- Form I UTC IMP Verification

Version Date: 5/5/08

# UTC IMP verification Form

**Inspector / Date:** Al Jones / September 28, 2012

**Inspection Dates:** September 17 – 19, 2012

**Operator Inspected:** Olympic Pipe Line Company

**OPID:** 30781

**Region:** Western

**Unit Inspected:** North & South

**Unit ID:** North – 925 and South - 32965

**Unit Type:** Interstate Hazardous Liquid

**Unit Address:** 2201 Lind Ave. SW, Suite 270

Renton, WA 98055

**Record Location:** Renton, WA.

## High Consequence Areas

### High Consequence areas in District

<b>Id</b>	<b>High Consequence area</b>	<b>Location</b>	<b>Reason</b>	<b>Mileage</b>	<b>HCA Verified</b>
1	Interstate Pipe - WA		High Population	160.8	
2	Interstate Pipe - WA		Other Population	174.7	
3	Interstate Pipe - WA		USA - Drinking Water	183.0	
4	Interstate Pipe - WA		USA - Ecological	203.7	
5	Interstate Pipe - WA		Comm. Navigable Waterway	62.1	
6					
7			<b>Total Miles of HCA</b>	<b>275</b>	
8					
9					
10					

### New HCA's

<b>High Consequence Area</b>	<b>Location</b>	<b>Reason</b>	<b>Mileage</b>	<b>Assessment Date</b>
	None			

# Assessments

## ILI

HCA ID	Tool(s), or assessment method(s)	Assessment review results	Prior Assessment date	Assessment date	Next Assessment date
Cherry Point - Ferndale 16"	internal geometry inspection and metal loss corrosion with a high resolution MFL Corrosion / High Resolution Geometry combination pig (CDX)	No actionable anomalies	November 2004	April 2009	April 2014
Ferndale - Allen 16"	internal geometry inspection and metal loss corrosion with a high resolution MFL Corrosion / High Resolution Geometry combination pig (CDX)	No actionable anomalies	November 2004	May 2009	May 2014
K Booster - Anacortes 16"	Hydrotest	Successful Test	n/a	September 2007	September 2012 ILI
Anacortes - Allen	internal geometry inspection and metal loss corrosion with a high resolution MFL Corrosion / High Resolution Geometry combination pig (CDX)	No actionable anomalies	November 2004	April 2009	April 2014
Allen - Renton 20"	internal geometry inspection and metal loss corrosion with a high resolution MFL Corrosion / High Resolution Geometry combination pig (CDX)	Two actionable anomalies reported	November 2004	April 2009	April 2014
Allen - Renton 16"	internal geometry inspection and metal loss corrosion with a high resolution MFL Corrosion / High Resolution Geometry combination pig (CDX)	one actionable anomaly reported	November 2004	May 2009	May 2014
Renton - Portland 14"	Rosen extended Geometry Pig (XGP) ; Rosen Corrosion Detection Pig (CDP)	No actionable anomalies	November 2005	March 2010	March 2015

Do assessments address unit threats?	<b>Yes</b>
Earth Movement threat addressed if applicable?	<b>Yes</b>

HCA ID	Immediate repairs	One year condition (gas) 60 180 Day condition(liq)	Monitored Condition (gas) 180 Day Other condition (liquid)
Cherry Point - Ferndale 16"	0	0	0
Ferndale - Allen	0	0	0
K Booster - Anacortes	0	0	0
Anacortes - Allen	0	0	0
Allen - Renton 20"	0	0	2
Allen - Renton 16"	1	0	0
Renton - Portland 14"	0	0	0

Were anomalies evaluated in timely manner?	Yes
Were repairs appropriate?	Yes

### Repair Summary

HCA ID	Cutouts	Leak clamp	clocksprings	sleeves	grinding	None	other
Allen - Renton 20" 2009-001			X				
Allen - Renton 20" 2009-002						X (re-coat)	
Allen - Renton 16" 2009-001	X			X			

### Defect Type

HCA ID	Third Party damage	corrosion	Outside force	Manufacturing defects	Construction defects	SCC	Other
Allen - Renton 20" 2009-001		X					
Allen - Renton 20" 2009-002				X			
Allen - Renton 16" 2009-001			X (ground fault)				

Amount of low frequency ERW pipe	33.5 miles ( 31.9 mi Ferndale-Allen, 0.6 mi Allen-Renton 16", 0.2 mi Anacortes-Allen, 0.8 mi Renton - Portland)
How is ERW pipe assessed	High Resolution MFL
When was ERW pipe assessed	2007, 2009, and 2010

PHMSA Form 19 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A HAZARDOUS LIQUID PIPELINE

1.	AR.IL.ILIACCEPCRITERIA.R	Sat+	Sat	Con	Unsat	NA	NC
	195.452(c)(1)(i)(A)		✓				
<b>Did the selected ILI tool run meet survey acceptance criteria?</b>							
<b>Notes:</b> <b>BP Olympic Pipe Line – NORTH (OPID: 30781, Unit ID: 925)</b>							
<b>Prepared by: Al Jones, UTC 9/28/2012</b>							
<b>Yes, a high resolution MFL tools were completed in 2009 for:</b>							
16" Cherry Point to Ferndale,							
16" Ferndale to Allen Station,							
16" Anacortes to Allen Station,							
16" Allen Station to Renton Station, and							
20" Allen Station to Renton.							

2.	AR.PTI.PRESSTESTRESULT.R	Sat+	Sat	Con	Unsat	NA	NC
	195.452(c)(1)(i)(b) (195.452(j)(5)(ii); Part 195 Subpart E; Part 195 Subpart G)		✓				
<b>From the review of the results of pressure tests, do the test records validate the pressure test?</b>							
<b>Notes:</b>							
<p><b>Yes, the K Booster (Tesoro Station) to Anacortes Terminal, about 1.5 miles in length, was successful hydro tested in September 2007. The initial test on September 14, 2007 failed near a road casing with a depth of cover of nine feet. The damaged pipe was replaced, and re-hydro tested on September 21, 2007. New launcher and receiver were installed on the pipe. The line was evaluated using MFL &amp; Geometry combination tool in August 2012.</b></p> <p><b>The original hydro test documentation of August 19, 1965 for the 14" line from the Allen to Renton Stations was reviewed. The line was tested for 24 hours at 1,825 psig which was 110% greater than 1,659 psig. The allowable pressure was controlled by ANSI 600 components at 1,440 psig.</b></p>							

3.	AR.OT.OTPLAN.R	Sat+	Sat	Con	Unsat	NA	NC
	195.452(c)(1)(i)(D) (195.452(j)(5)(iv); 195.452(h)(8))		✓				
<b>From the review of the results of selected integrity assessments, was the assessment performed in accordance with procedures and vendor recommendations?</b>							
<b>Notes</b>							
<b>Yes, the anomalies identified for evaluation have been completed and documented.</b>							

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4.	AR.RC.REMEDIATION.O	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)			✓				
<b>Is anomaly remediation and documentation of remediation adequate?</b>							
<b>Notes</b>							
Yes, see attached UTC IMP Verification Form for details.							

5.	IM.PM.PMMIMPLEMENT.O	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))			✓				
<b>Have preventive and mitigative actions been implemented as described in the records?</b>							
<b>Notes</b>							
Yes, 11 new MOV have been installed and 9 valves have been converted to MOV that are connected to Olympic SCADA system. Sixteen new check valves have been installed.							

6.	IM.HC.HCALOCATION.O	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.12(b); 195.450; 195.452(a); 195.452(b)(2))			✓				
<b>Are locations and boundaries of segments that can affect HCAs correctly identified and maintained up-to-date?</b>							
<b>Notes</b>							
Yes, review HCA map for the locations visited during field survey conditions.							

7.	AR.PTI.PRESSTESTCORR.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(g)(3) (195.452(f)(3))			✓				
<b>From the review of corrosion control records for pressure tests, is the corrosion control program effective?</b>							
<b>Notes</b>							
Yes.							

8.	PD.RW.ROWCONDITION.O	Sat+	Sat	Con	Unsat	NA	NC
195.412(a)			✓				
<b>Are the ROW conditions acceptable for the type of patrolling used?</b>							
<b>Notes</b>							
Yes, see attached photos of the cleared ROW conditions.							

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STANDARD INSPECTION REPORT OF A HAZARDOUS LIQUID PIPELINE

