

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 - SOUTH

Unit ID: 32965

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 18 - 19, 2012

AFOD: (I-07-1, I08-0.5)

SMART Activity Number: 141597

Operator Contact: Jim Bruen

Phone: 630 536-2535 **Fax:** 630 420-5519

Emergency: 888-271-8880

Unit Description:

The South Unit consists of a 14" line, 141 miles in length, transports refined petroleum products of gasoline, diesel, and jet fuel from Renton Pump Station to Portland, Oregon. Also, three pump stations are located at Tacoma, Olympia, and Castle Rock. Three intrastate laterals are located at Tacoma, Olympia (idled), and Vancouver.

The South Unit HCA affected mileage includes:

- 38.5% high population area,
- 62.8% other population area,
- 71.6% drinking water USA,
- 61.5% ecological resources USA, and
- 33.8% commercially navigable waterway

Facilities Inspected:

The South Unit 2010 inline inspection (ILI) reports were reviewed for the line including documentation for pipe anomaly evaluation and repairs.

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.

CF

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

Prior Offenses (for the past 5 years)		
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)

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

Id	High Consequence area	Location	Reason	Mileage	HCA Verified
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			Total Miles of HCA	275	
8					
9					
10					

New HCA's

High Consequence Area	Location	Reason	Mileage	Assessment Date
	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?	Yes
Earth Movement threat addressed if applicable?	Yes

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)				

Interesting
were both
anomalies
ground
faults?

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)			✓				
Did the selected ILI tool run meet survey acceptance criteria?							
Notes BP Olympic Pipe Line – SOUTH (OPID: 30781, Unit ID: 32965)							
Prepared by: Al Jones, UTC 9/28/2012							
Yes, a high resolution MFL & Geometry combination tools were completed in 2010 for the 14" pipeline from Renton to Portland, Oregon.							

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)			✓				
From the review of the results of pressure tests, do the test records validate the pressure test?							
Notes							
Yes.							

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))			✓				
From the review of the results of selected integrity assessments, was the assessment performed in accordance with procedures and vendor recommendations?							
Notes							
Yes, mechanical damage was located upstream of Jackson Highway South crossing south of Toledo in Lewis County. Several holidays in the coating and superficial scratches were found. The scratches were ground smooth and about 38 feet of pipe recoated. River weights were placed on the top portion of the pipe consisting of four inch thick concrete.							

4.	AR.RC.REMEDIATION.O	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)			✓				
Is anomaly remediation and documentation of remediation adequate?							
Notes							
Yes.							

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

5.	IM.PM.PMMIMPLEMENT.O	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))			✓				
Have preventive and mitigative actions been implemented as described in the records?							
Notes							
<p>Ten new MOV have been installed and six valves have been converted to MOV that are connected to Olympic SCADA system. Two new check valves have been installed. The depth of cover surveys monitor pipe at creek ditch crossing.</p> <p style="text-align: center;"><i>EH</i></p>							

6.	IM.HC.HCALLOCATION.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))			✓				
Are locations and boundaries of segments that can affect HCAs correctly identified and maintained up-to-date?							
Notes							
<p>Yes, review HCA map for the locations visited during field survey conditions.</p>							

7.	AR.PTI.PRESSTESTCORR.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(g)(3) (195.452(f)(3))			✓				
From the review of corrosion control records for pressure tests, is the corrosion control program effective?							
Notes							
<p>Yes, reviewed last year's annual CP survey from November 2011 for select HCA's for on, IR free, and casings voltages. All values were acceptable.</p>							

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