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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION



BP Pipelines (North America) Inc.
150 W. Warrenville Road
Naperville, IL 60563

December 16, 2013

David D. Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

RE: 2013 Hazardous Liquid Standard Inspection - BP Pipelines North America - BP Cherry Point Refinery

Dear Mr. Lykken:

This letter is in response to the Washington Utilities and Transportation Commission area of concern dated November 18, 2013.

A standard inspection was conducted from October 28 - 30, 2013 of the BP Pipelines North America (BP), BP Cherry Point Refinery by the staff from the Washington Utilities and Transportation Commission. The inspection included a records review and inspection of the pipeline facilities.

For ease of response, the area of concern and WUTC's finding(s) to BP are copied below in italics and is followed by BP's response.

1. **49 CFR §195.583 What must I do to monitor atmospheric corrosion control?**
 - (b) *During inspections you must give particular attention to pipe at soil -to-air interfaces, under thermal insulation, under disbonded coating, at pipe supports, in splash zones, at deck penetrations, and in spans over water.*

Finding(s):

There was one item of concern for the non-removable pipe supports used throughout both systems. These make it very difficult, if not impossible, to check for atmospheric corrosion between the supports and the line pipe.

BP Response:

BP believes that it is following current procedures with regard to the noted findings. Specifically, BP's requirements related to atmospheric corrosion monitoring are defined in BP OMER Procedure P-195.551 entitled *Corrosion Control* and further detailed in technical practice USPL-GP 06-214 entitled *Visual Inspection and Maintenance of Atmospherically Exposed Pipe Coating*. These documents note that during atmospheric corrosion inspections, inspectors must pay particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water. Additionally the pipe/support interface area shall be inspected for evidence of external corrosion of the pipe surface. Evidence of corrosion by-product shall be reported to the Corrosion Team Leader, Senior Corrosion Specialist or the Corrosion Technical Authority for further inspection and analysis. If engineering analysis is needed, the ILI Team Leader shall be contacted. For pipe inside a facility or terminal, the Facility Inspection Engineer shall be notified of the findings.

The atmospheric corrosion monitoring inspections for both in-scope pipeline systems were completed most recently in September 2013 and were performed by qualified personnel in accordance with the noted BP procedural requirements. Inspection findings indicate that there are no noted atmospheric corrosion deficiencies that require repair and that acceptable coating is in place to protect against atmospheric corrosion. The BP inspector did note an improvement opportunity exists to install wear pads at several pipe supports. Installation of the noted wear pads is targeted for completion by year end 2014.

If you have any questions, please contact me at 630-536-3419.

Sincerely,



For
David O. Barnes, P.E.
DOT Manager
BP Pipelines (North America) Inc.