



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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September 12, 2018

Mr. Gerald Maret  
President  
BP Pipelines (North America), Inc.  
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Chicago, IL 60606  
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**RE: 2016 Hazardous Liquid Standard Inspection – Olympic Pipe Line Company  
Intrastate Laterals (Insp. No. 6756)**

Dear Mr. Maret:

Thank you for your letter dated Jan. 6, 2017, addressing the findings of our inspection conducted from Nov. 14-17, 2016, of Olympic Pipe Line Company's (OPL's) intrastate laterals.

While staff accepts OPL's proposed response to the findings identified during the inspection, we disagree with OPL's premise that the minimal width of the pipe support would not allow atmospheric corrosion to exist which would jeopardize pipeline's integrity.

As an example, a local natural gas distribution company (LDC) conducted a study after severe corrosion was found under non-adjustable pipe supports (smaller than the pipe support identified in this inspection) during a standard inspection. The study basically concluded that if evidence of corrosion product is found (such as was found at the Seattle Delivery Facility), the pipe needs to be investigated to determine if it's integrity may be compromised. The LDC found that even a small amount of corrosion product could indicate severe pitting. In some cases where corrosion product was minimal, the "rust" was held in a pocket near the pipe and was not visible.

We believe the course of action OPL has determined will indeed yield conclusive results on the integrity of the pipeline. This is why we included the language in the letter that OPL look at its other non-adjustable supports and see if any corrosion product is visible, even if minimal. This would be especially prudent near salt water environments such as the Seattle Delivery Facility.

This inspection is closed as of Sept. 12, 2018.

Respect. Professionalism. Integrity. Accountability.

2016 HL Standard Inspection  
OPL – Intrastate Laterals  
Sept. 12, 2018

Staff thanks OPL's personnel for their cooperation and assistance during this inspection.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 664-1159.

Sincerely,



Sean C. Mayo

Pipeline Safety Director

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