



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email and First Class Mail

March 6, 2019

Gerald Maret
President
BP Pipelines North America
30 S Wacker Drive
Chicago, IL 60606

**RE: 2019 Natural Gas Transmission Operator Qualification Inspection– BP Pipelines
North America – Ferndale Pipeline System (Insp. No. 7844)**

Dear Mr. Maret:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Operator Qualification inspection of BP Pipelines North America, (BP), Ferndale Pipeline System from Jan 23 to Jan 24, 2019. The inspection included a records and process review inspection of pipeline facilities.

No apparent violations were noted as a result of the inspection, therefore this inspection will be closed as of the date of this closure letter.

Staff thanks BP's personnel for their professionalism and cooperation during this inspection.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrrough at (360) 664-1318.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

cc: Jim Bruen/DOT Programs Advisor/BP
John Newhouse/DOT Compliance Coordinator/BP

Inspection Output (IOR)

Generated on 2019.April.11 14:29

Inspection Information

Inspection Name	BP Ferndale OQ	Operator(s)	FERNDALE PIPELINE SYSTEM (570)	Plan Submitted	12/04/2018
Status	PLANNED	Lead	Anthony Dorrough	Plan Approval	12/05/2018
Start Year	2019	Supervisor	Joe Subits		by Joe Subits
System Type	GT	Director	Sean Mayo	All Activity Start	01/24/2019
Protocol Set ID	GT.2018.02			All Activity End	01/25/2019
				Inspection Submitted	--
				Inspection Approval	--

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	BP Ferndale OQ	BP Ferndale Pipeline Systems	unit	--	Storage Fields Bottle/Pipe - Holders Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Plastic pipe Abandoned	46	46	46	46	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	BP Ferndale OQ	n/a	TQ.OQ, TQ.QU, TQ.QUIM, TQ.QUOMCONST, TQ.TR	P, R, O, S	Detail	

Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Qst Assets	Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	OQ Questions	--	01/24/2019	01/25/2019	n/a	all planned questions	all assets	all types	46	46	46	46	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	OQ Questions	STARTED	--	OQ Questions	--

Results (all values, 46 results)

TQ.OQ: Operator Qualification

1. Question Result, ID, References **Sat, TQ.OQ.OOPLAN.P, 192.805(a) (192.801(b))**
Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*
Assets Covered **BP Ferndale OQ**
Result Notes **P-192.805**

2. Question Result, ID, References **Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)**
Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*
Assets Covered **BP Ferndale OQ**
Result Notes **Verified.**

3. Question Result, ID, References **Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)**
Question Text *Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?*
Assets Covered **BP Ferndale OQ**
Result Notes **Verified.**

4. Question Result, ID, References **Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))**
Question Text *Are evaluation methods established and documented appropriate to each covered task?*
Assets Covered **BP Ferndale OQ**
Result Notes **Verified.**

5. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))**
Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
Assets Covered **BP Ferndale OQ**
Result Notes **Verified.**

6. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 192.807**
Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
Assets Covered **BP Ferndale OQ**
Result Notes **Verified.**

7. Question Result, ID, References **Sat, TQ.OQ.TRAINING.P, 192.805(h)**
Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*
Assets Covered **BP Ferndale OQ**
Result Notes **Verified.**

8. Question Result, ID, References **Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))**
Question Text *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?*
Assets Covered **BP Ferndale OQ**
Result Notes **Verified.**

9. Question Result, ID, References **Sat, TQ.OQ.OOPLANCONTRACTOR.P, 192.805(b) (192.805(f), 192.805(c))**
 Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **Verified.**
10. Question Result, ID, References **Sat, TQ.OQ.OOCONTRACTOR.P, 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))**
 Question Text *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **Verified.**
11. Question Result, ID, References **Sat, TQ.OQ.OOCONTRACTOREQUIV.P, 192.805(h)**
 Question Text *Does the OQ plan document that the operator has assured that the processes on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **Verified.**
12. Question Result, ID, References **NA, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)**
 Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **Ferndale has no mutual assistance agreements.**
13. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.P, 192.803**
 Question Text *Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **P-192.805**
14. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)**
 Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **Verified.**
15. Question Result, ID, References **NC, TQ.OQ.ABNORMAL.O, 192.803**
 Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **Staff will observe as part of the BP Crude/Butane Standard inspection since personnel are the same.**
16. Question Result, ID, References **Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))**
 Question Text *Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **Verified.**
17. Question Result, ID, References **NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))**
 Question Text *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*
 Assets Covered **BP Ferndale OQ**

Result Notes Ferndale had no incident/accidents since last inspection.

18. Question Result, ID, References NC, TQ.OQ.OOPLAN.O, 192.805(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability?*

Assets Covered BP Ferndale OQ

Result Notes Staff will observe as part of the BP Crude/Butane Standard inspection since personnel are the same.

19. Question Result, ID, References Sat, TQ.OQ.MOC.P, 192.805(f)

Question Text *Does the OQ program identify how changes to processes, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*

Assets Covered BP Ferndale OQ

Result Notes Verified.

20. Question Result, ID, References Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i)

Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*

Assets Covered BP Ferndale OQ

Result Notes P-192.805

21. Question Result, ID, References Sat, TQ.OQ.CHANGERECD.R, 192.805(i) (192.805(f))

Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*

Assets Covered BP Ferndale OQ

Result Notes Verified.

TQ.QU: Qualification of Personnel - Specific Requirements

22. Question Result, ID, References Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))

Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*

Assets Covered BP Ferndale OQ

Result Notes P-192.453

23. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered BP Ferndale OQ

Result Notes Reviewed personnel records for Brian V. Stone and Gerald R. Wismer

24. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))

Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*

Assets Covered BP Ferndale OQ

Result Notes P-192.711 Repairs, Repalcements & Relocations - Section 11

25. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.R, 192.627 (192.807(a), 192.807(b))

Question Text *Do records indicate the qualification of personnel performing hot taps?*

Assets Covered BP Ferndale OQ

Result Notes BP has not had any of this work since the last inspection.

26. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.O, 192.627 (192.805(h))

Question Text *Do personnel performing hot taps demonstrate adequate skills and knowledge?*

Assets Covered BP Ferndale OQ

Result Notes BP has not had any of this work since the last inspection.

27. Question Result, ID, References Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-06-01, 192.801, 192.328)
Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*
Assets Covered BP Ferndale OQ
Result Notes P-192.319
28. Question Result, ID, References Sat, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-06-01, 192.801, 192.328)
Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*
Assets Covered BP Ferndale OQ
Result Notes Reviewed personnel records Charles A. Groves and Kevin E. Washington Jr.
29. Question Result, ID, References NA, TQ.QU.EXCAVATE.O, 192.805(b) (192.805(h), ADB-06-01, 192.801(a), 192.328(a), 192.328(c))
Question Text *Do individuals who oversee marking, trenching, and backfilling operations demonstrate adequate skills and knowledge?*
Assets Covered BP Ferndale OQ
Result Notes BP has none of this type of work going on at this time.

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

30. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b))
Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*
Assets Covered BP Ferndale OQ
Result Notes Reviewed ILI Christopher Wietlispach/Data Analyst 2, Martin Seconde/ILI Specialist

USPL-GP-32-001
31. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))
Question Text *Do records indicate adequate qualification of integrity management personnel?*
Assets Covered BP Ferndale OQ
Result Notes Reviewed ILI Christopher Wietlispach/Data Analyst 2, Martin Seconde/ILI Specialist
32. Question Result, ID, References Sat, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))
Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*
Assets Covered BP Ferndale OQ
Result Notes P-192.901L - BP refer to section 12 in it's entirety.

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

33. Question Result, ID, References Sat, TQ.QUOMCONST.INSPECTOR.P, 192.241(a) (192.241(c), 192.805(b), 192.328(a), 192.328(b))
Question Text *Does the process require welding inspection personnel to be adequately trained and qualified?*
Assets Covered BP Ferndale OQ
Result Notes P-192-225

USPL-GP 43-33 - Construction Inspector

34. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTOR.R, 192.241(a) (192.241(c), 192.807(a), 192.807(b))**
 Question Text *Do records indicate adequate qualification documentation for personnel who conduct welding inspections?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **BP has had no welding take place since last inspection.**
35. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTOR.O, 192.241(a) (192.241(c))**
 Question Text *Does the welding inspector demonstrate adequate skills and knowledge?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **BP has no welding activity planned.**
36. Question Result, ID, References **NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**
 Question Text *Do records indicate the qualification of nondestructive testing personnel?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **BP has no records, as there has been no welding since the last inspection.**
37. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**
 Question Text *Do records indicate that welders are adequately qualified?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **BP has no records, as there has been no welding since the last inspection.**
38. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 192.805(b))**
 Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **P-192.225 Welding -Section 3**

USPL-43-33-1
39. Question Result, ID, References **NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))**
 Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **BP has no low stress pipeline in this system.**
40. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.O, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.803, 192.328(a), 192.328(b))**
 Question Text *Do welders demonstrate adequate skills and knowledge?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **BP has no welding work planned.**
41. Question Result, ID, References **Sat, TQ.QUOMCONST.NDT.P, 192.243(b)(2) (192.803, 192.805(b), 192.805(h), 192.328(a), 192.328(b))**
 Question Text *Does the process require nondestructive testing of welds performed by personnel trained and qualified in processes and in use of the testing equipment?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **P-192.243**

USPL-GP 32-0013
42. Question Result, ID, References **NA, TQ.QUOMCONST.NDT.O, 192.243(b)(2) (192.803, 192.328(a), 192.328(b))**
 Question Text *Do nondestructive testing personnel demonstrate adequate skills and knowledge?*
 Assets Covered **BP Ferndale OQ**
 Result Notes **BP does not foresee an opportunity to observe this as there has been no welding since the last inspection.**

TQ.TR: Training of Personnel

43. Question Result, ID, References **Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))**
Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*
Assets Covered **BP Ferndale OQ**
Result Notes **P-192.615(b) Staff recommends**
1. Emergency training should cover different levels of responsibility and complexity, including, as applicable to the operator, personnel from the control center, managers and/or supervisors, field personnel, patrol pilots, communications systems, SCADA, etc.
44. Question Result, ID, References **Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))**
Question Text *Is training for emergency response personnel documented?*
Assets Covered **BP Ferndale OQ**
Result Notes **Joe Paquette/Team Leader - Charles Groves, Kevin Washington**
45. Question Result, ID, References **NC, TQ.TR.TRAINING.O, 192.615(b)(2) (192.805(b))**
Question Text *Do emergency response personnel demonstrate adequate skills and knowledge?*
Assets Covered **BP Ferndale OQ**
Result Notes **Staff will observe these skills during the Cherry Point Crude/Butane Standard inspection later this year.**
46. Question Result, ID, References **Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)**
Question Text *Does the process require review of emergency response personnel performance?*
Assets Covered **BP Ferndale OQ**
Result Notes **P-192.615(b) Emergency Response**

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.