Inspection Output (IOR)

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Inspection Information

Inspection Name	BP Cherry Point - Crude & Butane	Operator(s)	BP PIPELINE (NORTH AMERICA) INC. (31189)	Plan Submitted	09/01/2020
Status	PLANNED	Lead	Lex Vinsel	Plan Approval	09/03/2020 by Joe Subsits
Start Year	2020	Team Members	Scott Anderson	All Activity Start	12/09/2020
System Type	HL	Observer(s)	Scott Rukke, David Cullom, Anthony Dorrough, Deborah Becker, Derek Norwood, Darren Tinnerstet, Rell Koizumi	All Activity End	02/26/2021
Protocol Set ID	HL.2020.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

Hazardous Liquid Integrity Management (LIMP) from 2020

Same LIMP and O&M plan for the following units:

OPID	Unit name
31189	Olympic OPL
88979	Cherry Point (Butane & Crude)

Inspection ID	Unit Name	Inspection Type
8093	BP Cherry Point - Butane	LIMP
8094	BP Cherry Point - Butane	O&M
8095	BP Cherry Point - Crude	LIMP
8096	BP Cherry Point - Crude	O&M

Facilities visited and Total AFOD

Performed observations on the BP-OPL Right of Way (ROW)

Most of the inspection was done virtually due to COVID restrictions.

Summary of Significant Findings
(DO NOT Discuss Enforcement options)

No issues found during inspection time-frame.

Primary Operator contacts and/or participants

Jim Bruen

John Newhouse

Operator executive contact and mailing address for any official correspondence

Gerald Maret

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12Dec20 - Plan for this inspection is to carry over from 8086 O&M what questions that apply and populate this Question Set.

Jim B. will be taking over along with the person replacing John Newhouse

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	BP CP Cr & Bu	BP CP Crude and Butane	other	BP cherry point	Offshore GOM Crosses Nav. CO2 Biofuels Reg Rural Gather Rural Low Stress Abandoned	248	248	248	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 CP Cr & Bu	HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail
2.	BP CP Cr & Bu	Baseline Procedures (Form 3)	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	8093 & 8095 Crude & Butane IM	--	02/19/2021 02/26/2021	HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	all assets	all types	139	139	139	100.0%
2.	8094 & 8096 O&M	--	12/09/2020 12/11/2020	Baseline Procedures (Form 3)	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	all assets	all types	110	110	110	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

This inspection has no Form data entry.

Results (all values, 248 results)

283 (instead of 248) results are listed due to re-presentation of questions in more than one sub-group.

AR.EC: External Corrosion Direct Assessment (ECDA)

1. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.O, 195.505 (195.452(b)(5), 195.452(f)(8), 195.555)
   - Question Text: *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
   - Assets Covered: BP CP Cr & Bu
   - Result Notes: BP Cherry Point LIMP program does not use ECDA

2. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.P, 195.505 (195.452(f)(8), 195.555)
   - Question Text: *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*
   - Assets Covered: BP CP Cr & Bu
   - Result Notes: BP Cherry Point LIMP program does not use ECDA

3. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.R, 195.507 (195.452(l)(1), 195.555)
   - Question Text: *Do the records indicate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*
   - Assets Covered: BP CP Cr & Bu
   - Result Notes: BP Cherry Point LIMP program does not use ECDA

4. Question Result, ID, References: NA, AR.EC.ECDAPLAN.P, 195.588(b)(1) (195.588(b)(2) - (5), 195.452(f)(5), 195.452(j)(5)(iii))
   - Question Text: *Is there a process in place for conducting ECDA?*
   - Assets Covered: BP CP Cr & Bu
   - Result Notes: BP Cherry Point LIMP program does not use ECDA

5. Question Result, ID, References NA, AR.EC.ECDAPREASSESS.R, 195.589(c) (195.588(b)(2), 195.452(l)(1)(ii), 195.452(j)(5)(iii), 195.452(f)(5))

Question Text *Do the records indicate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

6. Question Result, ID, References NA, AR.EC.ECDAINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.588(b))

Question Text *Does the process include integrating ECDA results with other information?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

7. Question Result, ID, References NA, AR.EC.ECDAINTEGRATION.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.588(b))

Question Text *Do the records indicate that the operator integrated other data/information when evaluating data/results?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

8. Question Result, ID, References NA, AR.EC.ECDAREGION.R, 195.589(c) (195.588(b)(2)(ii), 195.588(b)(3), 195.588(b)(5)(ii), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii), 195.588(b)(1))

Question Text *Do the records indicate that the operator identified ECDA Regions?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

9. Question Result, ID, References NA, AR.EC.ECDAINDIRECT.R, 195.589(c) (195.588(b)(3), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text *Do the records indicate that the ECDA indirect inspection process complied with NACE SP0502-2010?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

10. Question Result, ID, References NA, AR.EC.ECDADIRECT.R, 195.589(c) (195.588(b)(4), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text *Do the records indicate that excavations, direct examinations, and data collection were performed in accordance with NACE SP0502-2010, Section 5?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

11. Question Result, ID, References NA, AR.EC.ECDADIRECT.O, 195.588(b)(4) (195.588(b)(1), 195.452(b)(5), 195.452(f)(5),)

Question Text *Were ECDA direct examinations conducted in accordance with the plan?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

12. Question Result, ID, References NA, AR.EC.ECDAANALYSIS.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(j)(5)(iii))

Question Text *Do the records indicate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

13. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.P, 195.588(b)(4)(iii) (195.452(f)(4))

Question Text *Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

14. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.R, 195.589(c) (195.588(b)(4)(iii), 195.452(l)(1)(ii), 195.452(f)(4))

Question Text *Do the records indicate that changes in the ECDA plan have been implemented and documented?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

15. Question Result, ID, References NA, AR.EC.ECDAPOSTASSESS.R, 195.589(c) (195.588(b)(5), 195.452(l)(1)(ii), 195.452(f)(4))

Question Text *Do the records indicate that the requirements for post assessment were implemented?*

Assets Covered BP CP Cr & Bu

Result Notes BP Cherry Point LIMP program does not use ECDA

AR.IA: Integrity Assessments

16. Question Result, ID, References Sat, AR.IA.METHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)

Question Text *Does the process specify assessment methods that are appropriate for the pipeline integrity threats?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid IM Program [Olympic Laterals & Cherry Point Crude and Butane] Rev November 5, 2020 Section 7 Continuous Evaluation and Assessment, Sub-Section Re-Assessment Methodology, paragraphs 1-4

17. Question Result, ID, References Sat, AR.IA.METHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)

Question Text *Do the records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed ILI Master History Schedule on 16Feb21 - Assessment plan appears appropriate.

18. Question Result, ID, References Sat, AR.IA.ASSESSSCHEDULE.P, 195.452(f)(5) (195.452(j)(3), 195.452(j)(5), 195.452(e), 195.452(g), 195.591)

Question Text *Does the process for assessment include a prioritized schedule in accordance with 195.452 (j) that is based on all the risk factors required by 195.452(e)?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid IM Program [Olympic Laterals & Cherry Point Crude and Butane] Rev November 5, 2020 Section 7 Continuous Evaluation and Assessment Re-Assessment Methodology, Procedure USPL-GP 43-0001, ReAssessment Interval Determination (RAID) Rev/Version 16Jan20.

19. Question Result, ID, References Sat, AR.IA.ASSESSSCHEDULE.R, 195.452(l)(1)(ii) (195.452(b)(5), 195.452(c), 195.452(d), 195.452(f)(5), 195.452(j)(3), 195.452(j)(5), 195.591)

Question Text *Do the records indicate that assessments are implemented as specified in the assessment plan?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed ILI Master History Schedule on 16Feb21 - Reviewed Record for Renton - Sea Tac line has a ILI reassessment date of 21Nov24. Reassessment Intervals appear appropriate.

20. Question Result, ID, References Sat, AR.IA.REVIEWQUAL.P, 195.452(f)(8) (195.452(g), 195.452(h)(2))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate integrity assessment results and information analysis?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0201, REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS rev 01Aug18, Section 6.8 (a) Analysis Personnel per ASNT ILI-PQ-2010

21. Question Result, ID, References Sat, AR.IA.REVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g), 195.452(h)(2))

Question Text *Do the records indicate that personnel who review and evaluate integrity assessment results and information analysis are qualified?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed certifications (ANSI/ASNT ILI PQ-2010) for Level III(3) Data Analysts Roberto Yanez and Thomas Meinzer, Certifications were current during analysis time-frame

22. Question Result, ID, References Sat, AR.IA.STANDARDS.P, 195.452(f)(5) (195.452(b)(6))

Question Text *Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing integrity assessments?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0201, REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS rev 01Aug18, Section 2 Normative Reference(s) API 1163 'In-Line Inspection Systems Qualification' and NACE SP0102-2010 "In-Line Inspection of Pipelines".

23. Question Result, ID, References Sat, AR.IA.STANDARDS.R, 195.452(l)(1)(ii) (195.452(b)(6))

Question Text *Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments?*

Assets Covered BP CP Cr & Bu

Result Notes Ultrasonic Wall Thickness, and Geometry Survey with Mapping Version 1 07Feb20, Initial Release. (NDT GLOBAL), reviewed Executive Summary. Results indicate an acceptable tool run was completed for Tacoma Lateral (BP-OPL).

AR.IL: In-Line Inspection (Smart Pigs)

24. Question Result, ID, References Sat, AR.IL.ILIIMPLPERQUAL.P, 195.452(f)(5) (195.591)

Question Text *Does the process identify the qualification requirements for personnel who perform ILI (In Line Inspections)?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0001 REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS section REQUIREMENTS FOR in Line INSPECTION PROJECTS. Section 6.1 In-Line Inspection Tool Run jPrep , Sub section 7, Qualification of personnel per ASNT ILI-PQ-2010

25. Question Result, ID, References Sat, AR.IL.ILIIMPLPERQUAL.R, 195.591 (195.452(l)(1)(ii), 195.452(f)(5))

Question Text *Do the records indicate that personnel who perform ILI (In Line Inspections) are qualified and certified (where applicable)?*

Assets Covered BP CP Cr & Bu

Result Notes Tacoma Junction to Tacoma Delivery, NDT Global LLC, ANSI/ASNT ILI PQ-2010 Level II Tool Operator (Ashley Schoellman) qualified on date of tool run 8-9 Dec 2019.

26. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 195.452(f)(8) (195.452(g))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0201, REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS rev 01Aug18, Section 6.8 (a) Analysis Personnel per ASNT ILI-PQ-2010

27. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g))

Question Text *Do the records indicate that personnel who review and evaluate ILI integrity assessment results and information analysis are qualified?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed certifications (ANSI/ASNT ILI PQ-2010) for Level III(3) Data Analysts Roberto Yanez and Thomas Meinzer, Certifications were current during analysis time-frame.

28. Question Result, ID, References Sat, AR.IL.ILISPECS.P, 195.452(f)(5) (195.452(h), 195.452(j), 195.591)

Question Text *Does the process include adequate ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0001 REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS section REQUIREMENTS FOR in Line INSPECTION PROJECTS. Section 6.1 In-Line Inspection Tool Run prep , Sub section a. 7, Qualification of personnel per ASNT ILI-PQ-2010

29. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.P, 195.452(f)(4) (195.452(j)(5)(i), 195.452(h), 195.591)

Question Text *Does the process include the validation of ILI results?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0200 In-Line Inspection (ILI) Data Evaluation and Resulting Repair Program Procedures for ILI Repair Projects rev 17Feb2020. Section 8 ILI Tool Runs and Evaluation Process,

30. Question Result, ID, References: Sat, AR.IL.ILIVALIDATE.R, 195.452(l)(1)(ii) (195.452(j)(5)(i), 195.452(f)(4), 195.452(h), 195.452(c)(1), 195.591)

Question Text: *Do the records for validating ILI assessment results indicate that the process was implemented?*

Assets Covered: BP CP Cr & Bu

Result Notes: Reviewed the yearly inteRAstate Laterals for Vancouver, SeaTac, Seattle, and Tacoma Lateral.

Olympia Lateral is idle with Nitrogen pressure.

31. Question Result, ID, References: Sat, AR.IL.ILIINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.452(h))

Question Text: *Does the process for evaluating ILI results include integration of all available information about the integrity of the pipeline?*

Assets Covered: BP CP Cr & Bu

Result Notes: USPL-GP 32-0001 REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS section REQUIREMENTS FOR in Line INSPECTION PROJECTS. Section 7.1 Definition of Discovery.

32. Question Result, ID, References: Sat, AR.IL.ILIINTEGRATION.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(h))

Question Text: *Do the records indicate that the operator integrated other data/information when evaluating ILI tool data/results?*

Assets Covered: BP CP Cr & Bu

Result Notes: Final Repair Plan report 03April2020 Tacoma Laterial ILI final repair plan.

33. Question Result, ID, References: NC, AR.IL.ILIIMPLEMENT.O, 195.452(b)(5)

Question Text: *Have the ILI procedures been followed?*

Assets Covered: BP CP Cr & Bu

Result Notes: No ILI inspection during 2020 time-frame.

AR.PTI: Integrity Assessment Via Pressure Test

34. Question Result, ID, References: Sat, AR.PTI.PRESSTESTACCEP.P, 195.452(f)(5) (195.304, 195.305, 195.306, 195.308, 195.452(j)(5)(ii))

Question Text: *Does the process define acceptance criteria for a successful pressure test?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid IM Program [Olympic Laterals & Cherry Point Crude and Butane] Rev November 5, 2020 Section 7 Continuous Evaluation and Assessment, Sub-Section Re-Assessment Methodology, paragraphs 1-4

35. Question Result, ID, References: Sat, AR.PTI.PRESSTESTCORR.P, 195.452(f)(3) (195.452(g)(3))

Question Text: *Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual, Hydrostatic Testing Procedure # P-195.300, Revision 06May 2020, Section VI(6) Hydro-testing for integrity management

36. Question Result, ID, References: NC, AR.PTI.PRESSTESTRESULT.O, 195.452(b)(5) (195.452(c)(1)(i)(b), 195.452(j)(5)(ii), 195.304)

Question Text: *Was the pressure test conducted in accordance with the procedures?*

Assets Covered: BP CP Cr & Bu

Result Notes: No pressure test performed during time frame of inspection.

37. Question Result, ID, References: NA, AR.PTI.PRESSTESTRESULT.R, 195.310 (195.452(f)(2), 195.452(f)(5), 195.452(c), 195.452(l)(1)(ii))

Question Text: *Do the pressure test records indicate compliance with Part 195, Subpart E?*

Assets Covered: BP CP Cr & Bu

Result Notes: No pressure test performed during time frame of inspection.

38. Question Result, ID, References: NA, AR.PTI.PRESSTESTCORR.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g)(3))

Question Text *When pressure testing was used as the integrity assessment method, do the records indicate that the effectiveness of the corrosion control program was documented?*

Assets Covered BP CP Cr & Bu

Result Notes No pressure test performed during time frame of inspection.

AR.OT: Other Technology

39. Question Result, ID, References NA, AR.OT.OTPLAN.P, 195.452(f)(5) (195.452(c)(1)(i)(D), 195.452(j)(5)(iv))

Question Text *If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe?*

Assets Covered BP CP Cr & Bu

Result Notes No 'Other Technologies' were used to evaluate the condition of the pipeline.

40. Question Result, ID, References NA, AR.OT.OTPLAN.R, 195.452(l)(1)(ii) (195.452(j)(5)(iv), 195.452(f)(5), 195.452(c)(1)(i)(D))

Question Text *Do the records indicate that the Other Technology integrity assessments were performed in accordance with procedures and vendor recommendations?*

Assets Covered BP CP Cr & Bu

Result Notes No 'Other Technologies' were used to evaluate the condition of the pipeline.

41. Question Result, ID, References NA, AR.OT.OTPLAN.O, 195.452(b)(5)

Question Text *Has the process for the use of "Other Technology" been followed?*

Assets Covered BP CP Cr & Bu

Result Notes No 'Other Technologies' were used to evaluate the condition of the pipeline.

42. Question Result, ID, References NA, AR.OT.ASSESSMENTREVIEW.P, 195.452(f)(8) (195.452(j)(5))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology?*

Assets Covered BP CP Cr & Bu

Result Notes No 'Other Technologies' were used to evaluate the condition of the pipeline.

43. Question Result, ID, References NA, AR.OT.ASSESSMENTREVIEW.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(j)(5))

Question Text *Do the records pertaining to the selected integrity assessments indicate that personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology are qualified?*

Assets Covered BP CP Cr & Bu

Result Notes No 'Other Technologies' were used to evaluate the condition of the pipeline.

AR.RCHCA: Repair Criteria (HCA)

44. Question Result, ID, References Sat, AR.RCHCA.DISCOVERY.P, 195.452(f)(4) (195.452(h)(2))

Question Text *Does the integrity assessment process define "discovery of condition" and the required time frame for anomalies in a pipeline segment that can affect an HCA?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0001 REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS Section 7.1 Definition of Discovery.

45. Question Result, ID, References Sat, AR.RCHCA.IMSCHEDULE.P, 195.452(f)(4) (195.452(h)(3), 195.452(h)(4))

Question Text *Does the process include developing a prioritized schedule for evaluating and remediating all identified repair conditions consistent with the repair criteria and within the time frames found in 195.452(h)(4)?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0001 REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS. Section 7.2 Excavation and Inspection or Repair Criteria for Liquid Pipelines.

46. Question Result, ID, References Sat, AR.RCHCA.DISCOVERY.R, 195.452(l)(1)(ii) (195.452(h)(2), 195.452(f)(4))

Question Text *Do the records indicate that â€œdiscovery of conditionâ€□ results for all anomalies occurred promptly, but no later than 180 days after the completion of the integrity assessment?*

Assets Covered BP CP Cr & Bu

Result Notes Review Repair Plan Progress Report for Tacoma Lateral Rev 23Jun2020, Tool Run was 8-9Dec2019. Discover date was 03Apr20 / Repair deadline 30Sep20/ Date of repair 19Jun20.

47. Question Result, ID, References Sat, AR.RCHCA.IMPRC.P, 195.452(f)(4) (195.452(h)(1), 195.452(h)(4))

Question Text *Does the process include criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Repairs, Replacements & Relocations Procedure # P-195.422, Section V(5) Reasons and Schedule for Repair.

48. Question Result, ID, References Sat, AR.RCHCA.REMEDIATION.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4), 195.452(b)(5), 195.569)

Question Text *Do records indicate that anomaly remediation and documentation of remediation was performed in accordance with the process?*

Assets Covered BP CP Cr & Bu

Result Notes Butane Line USPL-DrW-010-005, Exhibit 1 , Reviewed Exhibit 1

49. Question Result, ID, References Sat, AR.RCHCA.IMPRC.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(1), 195.452(h)(4))

Question Text *Do records indicate that prompt action was taken to address all anomalous conditions discovered through the integrity assessment or information analysis?*

Assets Covered BP CP Cr & Bu

50. Question Result, ID, References NA, AR.RCHCA.REMEDIATION.O, 195.452(b)(5) (195.402(a), 195.402(c)(14), 195.422(a), 195.569, 195.589(c))

Question Text *From an observation of a remediation or repair at an excavation site, are anomaly remediation activities adequate, performed in accordance with the categorized remediation/repair schedule, and documented?*

Assets Covered BP CP Cr & Bu

Result Notes No remediation/observation were performed for this unit.

51. Question Result, ID, References Sat, AR.RCHCA.REMEDIATION.P, 195.452(f)(4) (195.452(h)(1), 195.422(b))

Question Text *Does the process require that remedial actions be performed in a manner that addresses the integrity issues raised by the assessment methods used and information analysis?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Repairs, Replacements & Relocations Procedure # P-195.422, Section V(5) Reasons and Schedule for Repair.

52. Question Result, ID, References Sat, AR.RCHCA.PRESSREDUCE.P, 195.452(f)(4) (195.428, 195.452(h)(1)(i), 195.452(h)(1)(ii))

Question Text *Does the process for pressure reduction meet the code requirements?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Repairs, Replacements & Relocations Procedure # P-195.422, Section VI(6) Field Inspection / Evaluation of Pipe Defects, Sub-Section A Pressure Reduction.

53. Question Result, ID, References NA, AR.RCHCA.PRESSREDUCE.R, 195.452(l)(1)(ii) (195.404(a), 195.404 (b), 195.452(h)(1)(ii), 195.452(h)(4)(i), 195.55(a), 195.56)

Question Text *Do the integrity assessment records indicate that the pressure reduction taken was acceptable and promptly implemented?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

54. Question Result, ID, References NA, AR.RCHCA.IMSCHEDULE.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4))

Question Text *Do the records indicate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(4)?*

Assets Covered BP CP Cr & Bu

Result Notes No repair conditions for 2017-2019. Laterals were pigged (ILI) in 2015 & 2019. Laterals were pigged in 2019 with results expected in 2020.

Laterals are Olympic IntRAstate Laterals, Cherry Point Crude and Cherry Point Butane. Olympic Laterals are Tacoma, Seattle, SeaTac and Vancouver, Olympia lateral is idle with Nitrogen pressure.

55. Question Result, ID, References Sat, AR.RCHCA.CRACKREMEDIATION.P, 195.452(f)(4) (195.452(h), 195.588(c))

Question Text *If the pipeline is susceptible to cracking, does the process include criteria for remedial actions to address integrity issues raised by the assessment method?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-GP 32-0200 REQUIREMENTS FOR IN-LINE INSPECTION PROJECTS section REQUIREMENTS FOR in Line INSPECTION PROJECTS. Section 7.2 Excavation and Inspection or Repair Criteria for Liquid Pipelines.

56. Question Result, ID, References NA, AR.RCHCA.CRACKREMEDIATION.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(4)(iii)(G), 195.588(c))

Question Text *If the pipeline is susceptible to cracking, do the records indicate that the remedial actions have been documented?*

Assets Covered BP CP Cr & Bu

Result Notes No repair conditions for 2017-2019. Laterals were pigged (ILI) in 2015 & 2019. Laterals were pigged in 2019 with results expected in 2020.

Laterals are Olympic IntRAstate Laterals, Cherry Point Crude and Cherry Point Butane. Olympic Laterals are Tacoma, Seattle, Sea tac and Vancouver, Olympia lateral is idle with Nitrogen pressure.

AR.RMP: Repair Methods and Practices

57. Question Result, ID, References Sat, AR.RMP.SAFETY.P, 195.402(c)(14) (195.422(a), 195.452(h)(1))

Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Procedure #195.422, Section I, Subsection A appears adequate.

58. Question Result, ID, References NC, AR.RMP.SAFETY.O, 195.422(a) (195.402(c)(14), 195.452(h)(1))

Question Text *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?*

Assets Covered BP CP Cr & Bu

Result Notes Due to COVAD issues, field observations were limited to Olympic Pipeline IntRAstate Laterals only.

59. Question Result, ID, References Sat, AR.RMP.METHOD.P, 195.402(c)(3) (195.452(h)(1), 195.585)

Question Text *Does the process identify permissible repair methods for each type of defect?*

Assets Covered BP CP Cr & Bu

60. Question Result, ID, References NA, AR.RMP.METHOD.R, 195.404(c)(1) (195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1), 195.401(b)(2))

Question Text *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

61. Question Result, ID, References NA, AR.RMP.REPAIRQUAL.R, 195.505(b) (195.507(a), 195.505(c), 195.452(h)(1), 195.452(b)(5))

Question Text *From the records review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

62. Question Result, ID, References NA, AR.RMP.PIPECONDITION.R, 195.404(c)(1) (195.404(c)(2), 195.452(l)(1)(ii))

Question Text *Do the repair records document all the information needed to understand the conditions of the pipe and its environment and also provide the information needed to support the Integrity Management program, when applicable?*

Assets Covered BP CP Cr & Bu

Result Notes No such requirement existed in the scope of inspection review.

63. Question Result, ID, References NA, AR.RMP.REPLACESTD.R, 195.404(a)(1) (195.422(b),)

Question Text *Were all replaced line pipe and/or components designed and constructed as required by Part 195?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

64. Question Result, ID, References NA, AR.RMP.PIPEMOVE.R, 195.424(a) (195.424(b), 195.424(c))

Question Text *From a review of selected records, were pipeline movements performed in accordance with 195.424?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

65. Question Result, ID, References NA, AR.RMP.WELDERQUAL.R, 195.214(a) (195.214(b), 195.222(a), 195.222(b),)

Question Text *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

66. Question Result, ID, References NA, AR.RMP.WELDQUAL.R, 195.226(a) (195.226(b), 195.226(c), 195.230(a), 195.230(b), 195.230(c),)

Question Text *From the review of the results of integrity assessment and remediation projects, were defects on new welds repaired in accordance with 195.226 or 195.230?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

67. Question Result, ID, References NA, AR.RMP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234(a), 195.234(b), 195.234(c), 195.234(d), 195.234(e),)

Question Text *From the review of the results of remediation projects, were new welds inspected and examined in accordance with 195.228 or 195.234?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

68. Question Result, ID, References Sat, AR.RMP.CRACKNDE.P, 195.452(f)(4) (195.452(h))

Question Text *Does the process include appropriate NDE method(s) and other information gathering during the evaluation of cracks and cracking?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Repairs, Replacements & Relocations Procedure #P-195.422, Section III(3) Pipeline Examination, Sub-Section E

69. Question Result, ID, References NA, AR.RMP.CRACKNDE.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h), 195.404(c))

Question Text *Do the records indicate that appropriate NDE method(s) were used and other information was gathered related to the evaluation of cracking?*

Assets Covered BP CP Cr & Bu

Result Notes None within time frame of inspection 2017-2019.

CR.SCADA: Supervisory Control and Data Acquisition

70. Question Result, ID, References Sat, CR.SCADA.SETPOINT.P, 195.446(c)(2) (195.406(b))

Question Text *Does the process adequately define safety-related points?*

Assets Covered BP CP Cr & Bu

Result Notes Renton Control Center Alarm Management Plan, Document Number: CRCCA-OPS-461-001, Section 8.3, includes this requirement.

CR.LD: Leak Detection

71. Question Result, ID, References Sat, CR.LD.CPM.P, 195.402(a) (195.444, 195.446(b), 195.446(c))

Question Text *If Computational Pipeline Monitoring (CPM) is used, does it comply with guidance in API 1130 requirements in operating, maintaining, testing, record-keeping, and dispatcher training?*

Assets Covered BP CP Cr & Bu

Result Notes Computational Pipeline Monitoring (CPM) Procedure, Description, first page.

DC.WELDINSP: Construction Weld Inspection

72. Question Result, ID, References Sat, DC.WELDINSP.WELDREPAIR.P, 195.202 (195.230(a), 195.230(b), 195.230(c)) (also presented in: TDC.WELDINSP)

Question Text *Are welds that are unacceptable required to be removed and/or repaired as specified by 195.230 and are repair procedures in place?*

Assets Covered BP CP Cr & Bu

Result Notes Welding procedure # P-195.214 Section V(5) , Sub-section A, covers this requirement.

73. Question Result, ID, References Sat, DC.WELDINSP.WELDNDT.P, 195.234(a) (195.234(b), 195.234(c)) (also presented in: TDC.WELDINSP)

Question Text *Are there processes for nondestructive testing and for determining standards of acceptability?*

Assets Covered BP CP Cr & Bu

Result Notes Welding procedure # P-195.214 Section IV(4) , Sub-section A, covers this requirement references #195.234 Non-Destructive Testing

74. Question Result, ID, References Sat, DC.WELDINSP.WELDNDTQUAL.P, 195.202 (195.234(b)(2)) (also presented in: TDC.WELDINSP)

Question Text *Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel who are trained in procedures established to ensure compliance with 195.228 and in use of the testing equipment?*

Assets Covered BP CP Cr & Bu

Result Notes Non-Destructive Testing Procedure # P-195.234 Section III(3) Personnel, covers this requirement.

75. Question Result, ID, References Sat, DC.WELDINSP.GIRTHWELDNDT.P, 195.202 (195.234(d), 195.234(e), 195.234(f), 195.234(g), 195.266) (also presented in: TDC.WELDINSP)

Question Text *Does the process require certain girth welds to be nondestructively tested in accordance with 195.234(d), (e), (f), and (g)?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual, Non-Destructive Test Procedure # P-195.234, Section VIII(8) Minimum Coverage of Radio graphic Inspection, Section B.

DC.WELDERQUAL: Construction Welder Qualification

76. Question Result, ID, References Sat, DC.WELDERQUAL.WELDERQUAL.P, 195.222(a) (195.222(b)) (also presented in: TDC.WELDERQUAL)

Question Text *Is each welder required to be qualified in accordance with section 6 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Welding Procedure # P-195.214, Section III(3). Welder Quantification, Sub-section A.

DC.WELDPROCEDURE: Construction Welding Procedures

77. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.P, 195.214(a) (also presented in: TDC.WELDPROCEDURE)

Question Text *Does the process require welding to be performed by qualified welders using qualified welding procedures?*

Assets Covered BP CP Cr & Bu

78. Question Result, ID, References: Sat, DC.WELDPROCEDURE.WELDPROCEDURE.P, 195.214(b) (also presented in: TDC.WELDPROCEDURE)

Question Text: *Are welding procedures and qualifying tests required to be recorded in detail?*

Assets Covered: BP CP Cr & Bu

79. Question Result, ID, References: Sat, DC.WELDPROCEDURE.ARCBURNGRNDWIRE.P, 195.202 (195.226(a), 195.226(b), 195.226(c)) (also presented in: TDC.WELDPROCEDURE)

Question Text: *Does the process address arc burns and ground wires in accordance with 195.226?*

Assets Covered: BP CP Cr & Bu

Result Notes: USPL--GP 43-33-1, Section 9.4 (Grounding Connections) & Section 12.2 (Arc Burns).

DC.DN: Design

80. Question Result, ID, References: Sat, DC.DN.DESIGNPRESS.P, 195.106(a) (195.106(b), 195.106(c), 195.106(d), 195.106(e)) (also presented in: TDC.TKPIPING)

Question Text: *Does the process require the internal design pressure of the pipeline (or pipe) be determined in accordance with 195.106?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Maximum Operating Pressure Procedure # P-195.406, Section, Procedure Steps Subsection I(1) requires use of 195.106.

81. Question Result, ID, References: Sat, DC.DN.ILIPASS.P, 195.202 (195.120(a))

Question Text: *Does the process require the pipeline be designed and constructed to accommodate the passage of instrumented internal inspection devices?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual, Repairs, Replacements & Relocation Procedure # P195.442, Section IV(4) Requirements for In-Line Inspections, Sub Section A.

82. Question Result, ID, References: Sat, DC.DN.CPMDESIGN.P, 195.134

Question Text: *If Computational Pipeline Monitoring (CPM) is used, does it comply with guidance in API 1130 requirements in design, operating, maintaining, testing, record-keeping, and dispatcher training?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Welding Procedure # P-195.214, Section III(3). Welder Quantification, Sub-sections A&B.

DC.MO: Maintenance and Operations

83. Question Result, ID, References: Sat, DC.MO.MOVE.P, 195.402(a) (195.424(a), 195.424(b), 195.424(c))

Question Text: *Has a process been developed for pipeline movements in accordance with 195.424?*

Assets Covered: BP CP Cr & Bu

Result Notes: 195.422 Repairs Replacement Relocations Procedure 195.422 Section X. Line Movement

DC.PT: Pressure Testing

84. Question Result, ID, References: Sat, DC.PT.PRESSTEST.P, 195.402(c) (195.302(a), 195.304, 195.305, 195.306, 195.310)

Question Text: *Does the process have adequate test procedures?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Welding Procedure # P-195.300, General Section appears adequate.

85. Question Result, ID, References: Sat, DC.PT.PRESSTESTTIEIN.P, 195.402(c) (195.308)

Question Text: *Does the process require testing of pipe associated with tie-ins, either with the section to be tied in or separately?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Welding Procedure # P-195.300 Section I(1) General Section includes what to do about testing of tie in sections.

TDC.TKPIPING: New Tank Piping - Construction

86. Question Result, ID, References: Sat, DC.DN.DESIGNPRESS.P, 195.106(a) (195.106(b), 195.106(c), 195.106(d), 195.106(e)) (also presented in: DC.DN)

Question Text: *Does the process require the internal design pressure of the pipeline (or pipe) be determined in accordance with 195.106?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Maximum Operating Pressure Procedure # P-195.406, Section, Procedure Steps Subsection I(1) requires use of 195.106.

TDC.WELDPROCEDURE: New Tank Piping - Construction Welding Procedures (Re-Presented)

87. Question Result, ID, References: Sat, DC.WELDPROCEDURE.WELDPROCEDURE.P, 195.214(b) (also presented in: DC.WELDPROCEDURE)

Question Text: *Are welding procedures and qualifying tests required to be recorded in detail?*

Assets Covered: BP CP Cr & Bu

88. Question Result, ID, References: Sat, DC.WELDPROCEDURE.WELD.P, 195.214(a) (also presented in: DC.WELDPROCEDURE)

Question Text: *Does the process require welding to be performed by qualified welders using qualified welding procedures?*

Assets Covered: BP CP Cr & Bu

89. Question Result, ID, References: Sat, DC.WELDPROCEDURE.ARCBURNGRNDWIRE.P, 195.202 (195.226(a), 195.226(b), 195.226(c)) (also presented in: DC.WELDPROCEDURE)

Question Text: *Does the process address arc burns and ground wires in accordance with 195.226?*

Assets Covered: BP CP Cr & Bu

Result Notes: USPL--GP 43-33-1, Section 9.4 (Grounding Connections) & Section 12.2 (Arc Burns).

TDC.WELDERQUAL: New Tank Piping - Construction Welder Qualification (Re-Presented)

90. Question Result, ID, References: Sat, DC.WELDERQUAL.WELDERQUAL.P, 195.222(a) (195.222(b)) (also presented in: DC.WELDERQUAL)

Question Text: *Is each welder required to be qualified in accordance with section 6 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Welding Procedure # P-195.214, Section III(3). Welder Quantification, Sub-section A.

TDC.WELDINSP: New Tank Piping - Construction Weld Inspection (Re-Presented)

91. Question Result, ID, References: Sat, DC.WELDINSP.WELDREPAIR.P, 195.202 (195.230(a), 195.230(b), 195.230(c)) (also presented in: DC.WELDINSP)

Question Text: *Are welds that are unacceptable required to be removed and/or repaired as specified by 195.230 and are repair procedures in place?*

Assets Covered: BP CP Cr & Bu

Result Notes: Welding procedure # P-195.214 Section V(5) , Sub-section A, covers this requirement.

92. Question Result, ID, References: Sat, DC.WELDINSP.WELDNDT.P, 195.234(a) (195.234(b), 195.234(c)) (also presented in: DC.WELDINSP)

Question Text: *Are there processes for nondestructive testing and for determining standards of acceptability?*

Assets Covered: BP CP Cr & Bu

Result Notes: Welding procedure # P-195.214 Section IV(4) , Sub-section A, covers this requirement references #195.234 Non-Destructive Testing

93. Question Result, ID, References: Sat, DC.WELDINSP.WELDNDTQUAL.P, 195.202 (195.234(b)(2)) (also presented in: DC.WELDINSP)

Question Text: *Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel who are trained in procedures established to ensure compliance with 195.228 and in use of the testing equipment?*

Assets Covered BP CP Cr & Bu

Result Notes Non-Destructive Testing Procedure # P-195.234 Section III(3) Personnel, covers this requirement.

94. Question Result, ID, References Sat, DC.WELDINSP.GIRTHWELDNDT.P, 195.202 (195.234(d), 195.234(e), 195.234(f), 195.234(g), 195.266) (also presented in: DC.WELDINSP)

Question Text *Does the process require certain girth welds to be nondestructively tested in accordance with 195.234(d), (e), (f), and (g)?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual, Non-Destructive Test Procedure # P-195.234, Section VIII(8) Minimum Coverage of Radio graphic Inspection, Section B.

TDC.IMFACIL: Integrity Management for Facilities (Re-Presented)

95. Question Result, ID, References Sat, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: IM.FACIL)

Question Text *Does the program include a written process for identification of facilities that could affect an HCA?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' determination for Pipeline Facilities.

96. Question Result, ID, References Sat, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(3)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*

Assets Covered BP CP Cr & Bu

Result Notes Records appear adequate and up to date.

97. Question Result, ID, References Sat, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

Question Text *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' determination for Pipeline Facilities.

98. Question Result, ID, References Sat, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

Question Text *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*

Assets Covered BP CP Cr & Bu

Result Notes ArcGIS Visual Representation of Spill Modeling Output appears adequate and up-to-date.

99. Question Result, ID, References Sat, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

Question Text *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' determination for Pipeline Facilities.

100. Question Result, ID, References Sat, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

Question Text *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*

Assets Covered BP CP Cr & Bu

101. Question Result, ID, References Sat, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

Question Text *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*

Assets Covered BP CP Cr & Bu

102. Question Result, ID, References Sat, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*

Assets Covered BP CP Cr & Bu

Result Notes PROCESS HAZARD ANALYSIS HAZOP/LOPA REPORT, USPL-Ferndale Gas, Cherry Point Crude, and Cherry Point Butane - FINAL April 2019.

103. Question Result, ID, References Sat, IM.FACIL.PMMMITIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered BP CP Cr & Bu

Result Notes BP NA Liquid Integrity Management Plan, Section 5, Information Analysis (Reference Section 195.542(f)(3)) Sub-section Process Hazard Analysis

104. Question Result, ID, References Sat, IM.FACIL.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

Assets Covered BP CP Cr & Bu

Result Notes PROCESS HAZARD ANALYSIS HAZOP/LOPA REPORT, USPL-Ferndale Gas, Cherry Point Crude, and Cherry Point Butane - FINAL April 2019.

105. Question Result, ID, References NC, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: IM.FACIL)

Question Text *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*

Assets Covered BP CP Cr & Bu

Result Notes Field visits were not performed due to COVAD issues.

EP.ERL: Emergency Response Liquids

106. Question Result, ID, References Sat, EP.ERL.ACCIDENTANALYSIS.P, 195.402(a) (195.402(c)(5), 195.402(c)(6))

Question Text *Does the O&M plan include processes for analyzing pipeline accidents to determine their causes?*

Assets Covered BP CP Cr & Bu

107. Question Result, ID, References Sat, EP.ERL.LIAISON.P, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4)

Question Text *Does the O&M plan include processes for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America), Inc., USPL Public Awareness Program, Section 6 Stakeholder Identification

108. Question Result, ID, References Sat, EP.ERL.NOTICES.P, 195.402(a) (195.402(e)(1))

Question Text *Does the emergency plan include processes for receiving, identifying, and classifying notices of events which need immediate response and providing notice to operator personnel or to fire, police or other appropriate officials, as appropriate, for corrective action?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergencies Procedure # p-195.402(e) Section II(2) , sub-section A. Field Responders Responsibilities

109. Question Result, ID, References Sat, EP.ERL.RESPONSE.P, 195.402(a) (195.402(c)(4), 195.402(c)(6), 195.402(e)(2), 195.402(e)(10))

Question Text *Does the emergency plan include processes for making a prompt and effective response to a notice of each type of emergency, fire, explosion, accidental release of a hazardous liquid, operational failure, or natural disaster affecting the pipeline?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergencies Procedure # P-195.402(e), Section - First Responders covers the requirement of making prompt and effective response to a notice of each type of Emergency.

110. Question Result, ID, References Sat, EP.ERL.READINESS.P, 195.402(a) (195.402(e)(3))

Question Text *Does the emergency plan include processes to ensure the availability of personnel, equipment, instruments, tools, and materials as needed at the scene of an emergency?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergencies Procedure # P-195.402(e), Section II(2) subsection A. Field Responders Responsibilities - number 9.

111. Question Result, ID, References Sat, EP.ERL.RELEASEREDUCE.P, 195.402(a) (195.402(e)(4))

Question Text *Does the emergency plan include processes for taking necessary action; such as an emergency shutdown or pressure reduction, to minimize the volume released from any section of a pipeline system in the event of a failure?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergencies Procedure # P-195.402(e), Section II(2) Section B Pipeline Controllers Responsibilities - number 4.

112. Question Result, ID, References Sat, EP.ERL.HAZREDUCE.P, 195.402(a) (195.402(c)(11), 195.402(e)(5))

Question Text *Does the emergency plan include processes for controlling the release of liquid at an accident scene to minimize the hazards, including possible ignition in the cases of flammable HVLs?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergencies Procedure # P-195.402(e), Section II(2) Sections A - Field Responder Responsibilities and B - Pipeline Controller Responsibilities.

113. Question Result, ID, References Sat, EP.ERL.PUBLICHAZ.P, 195.402(a) (195.402(e)(6))

Question Text *Does the emergency plan include procedures for minimizing public exposure to injury and probability of accidental ignition by assisting with evacuation, assisting with halting traffic on roads and railroads, or taking other appropriate action?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergencies Procedure # P-195.402(e), Section II(2) Sections A - Field Responder Responsibilities.

114. Question Result, ID, References Sat, EP.ERL.AUTHORITIES.P, 195.402(a) (195.402(e)(7))

Question Text *Does the emergency plan include processes for notifying fire, police, and other appropriate public officials of hazardous liquid emergencies and coordinating with them preplanned and actual responses during an emergency, including additional precautions necessary for an emergency involving HVLs?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergencies Procedure # P-195.402(e), Section II(2) Sections A - Field Responder Responsibilities Sub-Section A4. Responsibilities.

115. Question Result, ID, References NA, EP.ERL.HVLMEASURE.P, 195.402(a) (195.402(e)(8))

Question Text *Does the emergency plan include processes for determining the extent and coverage of vapor cloud and hazardous areas of HVLs by using appropriate instruments?*

Assets Covered BP CP Cr & Bu

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

116. Question Result, ID, References Sat, EP.ERL.POSTEVNTREVIEW.P, 195.402(a) (195.402(e)(9))

Question Text *Does the emergency plan include processes for providing for a post-accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Investigation of Accident/Failures Procedure # P--195.402(c)(5) Section I(1) Analysis of Employee/Contractor Role in Accident Section I(1) A & Section II(2) Review of Response Procedures

117. Question Result, ID, References Sat, EP.ERL.COMMSYS.P, 195.408(a) (195.408(b))

Question Text *Does the process address emergency communication system(s)?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Communications Procedure # P-195.408: Procedure Steps Section I(1) Emergency; Section (2) Two-Way Communications, & Section III(3) Operational Data.

FS.FG: Facilities General

118. Question Result, ID, References Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: PD.SN)

Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Security of Facilities Procedure # P-195.436 Section II(2) Signs

119. Question Result, ID, References Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: PD.SN)

Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Security of Facilities Procedure # P-195.436 Section I(1) Security of Facilities, Sub Section B .

120. Question Result, ID, References Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: PD.SN)

Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Security of Facilities Procedure # P-195.436 Section II(1) Subsection A. Security.

121. Question Result, ID, References Sat, FS.FG.FIREPROT.P, 195.402(c)(3) (195.430(a), 195.430(b), 195.430(c))

Question Text *Does the process require firefighting equipment at pump station/breakout tank areas?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Inspection of Firefighting Equipment Procedure # P-195.430 Section I(1) Firefighting equipment, Sub Section A Firefighting equipment.

FS.PS: Pump Stations

122. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTESTHVL.P, 195.402(c)(3) (195.428(a)) (also presented in: MO.LMOPP)

Question Text *Does the process contain procedures for inspecting and testing each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment on HVL pipelines?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Overpressure Safety Devices Procedure # P-195.428(a) Section III(3) Relief Valves, Section IV(4) Control Valves, Section V(5) Switches and Section VI(6) Pressure Transmitters.

123. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.P, 195.402(c)(3) (195.428(a)) (also presented in: MO.LMOPP)

Question Text *Does the process adequately detail the inspecting and testing of each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Overpressure Safety Devices Procedure # P-195.428(a) Section III(3) Relief Valves, Section IV(4) Control Valves, Section V(5) Switches and Section VI(6) Pressure Transmitters.

124. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.P, 195.402(c)(3) (195.426) (also presented in: MO.LMOPP)

Question Text *Does the process include requirements for relief devices and their proper use for launchers and receivers?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Scraper & Sphere Facilities (Pigging Pipeline) Procedure # P-195.426 Section I(1) Introduction.

FS.TS: Tanks and Storage

125. Question Result, ID, References: Sat, FS.TS.PRVTESTHVLBO.P, 195.402(c)(3) (195.428(b))

Question Text: *Does the process require inspection and testing of pressure relief valves on HVL pressure breakout tanks at the required frequency?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Overpressure Safety Devices Procedure #P-195.428(a) Section I(1) , Subsection A, last paragraph.

126. Question Result, ID, References: Sat, FS.TS.OVERFILLBO.P, 195.402(c)(3) (195.428(a), 195.428(c), 195.428(d))

Question Text: *Does the process require adequate testing and inspection of overfill devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Inspection of Overfill Protection Systems Procedure # 195.428(d) Section I(1) Tank overfill protection systems. SubSection A

FS.VA: Valves

127. Question Result, ID, References: Sat, MO.LM.VALVEMAINT.P, 195.402(c)(3) (195.420(a)) (also presented in: MO.LM)

Question Text: *Does the process adequately address the maintenance program for each valve that is necessary for safe operation of the pipeline system?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Inspection of Mainline Valves Procedure # P-195.420 Section III(3) Inspection Reports

128. Question Result, ID, References: Sat, MO.LM.VALVEMAINTBIANN.P, 195.402(c)(3) (195.420(b)) (also presented in: MO.LM)

Question Text: *Does the process address inspecting each mainline valve?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Inspection of Mainline Valves Procedure # P-195.420 Frequency

129. Question Result, ID, References: Sat, MO.LM.VALVEPROTECT.P, 195.402(c)(3) (195.420(c)) (also presented in: MO.LM)

Question Text: *Does the process contain criteria for providing protection for each valve from unauthorized operation and from vandalism?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Inspection of Mainline Valves Procedure # P-195.420 Section I (1) Valve Security

IM.HC: High Consequence Areas

130. Question Result, ID, References: Sat, IM.HC.HCALOCATION.P, 195.452(f)(1) (195.452(a), 195.452(d)(3), 195.452(b)(2))

Question Text: *Does the process require the identification of HCA-affecting pipe segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?*

Assets Covered: BP CP Cr & Bu

Result Notes: Operator uses the NPMS website for mapping. NPMS source of shape files and population data sets.

131. Question Result, ID, References: Sat, IM.HC.HCALOCATION.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a), 195.452(b)(2), 195.452(d)(3), 195.452(j)(1))

Question Text: *Do records indicate that locations and boundaries of HCA-affecting pipe segments are correctly identified and maintained up-to-date?*

Assets Covered: BP CP Cr & Bu

Result Notes: Olympic Pipeline shared the HCA areas for their laterals by looking at the mapping programs that they use. Review of visual of spill modeling and HCA determination per BP NA. Mapping program and utilization appear adequate.

132. Question Result, ID, References: Sat, IM.HC.HCALOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1))

Question Text *Are locations and boundaries of pipe segments that can affect HCAs correctly identified and maintained up-to-date in accordance with the program?*

Assets Covered BP CP Cr & Bu

Result Notes Mapping program and maps appear to be adequate. Olympic Pipeline IntRAstate Laterals are all 100% HCA. Olympia Lateral is idle.

133. Question Result, ID, References Sat, IM.HC.HCAIDENT.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include all locations where pipeline segments directly intersect a high consequence area?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' Segment Identification Process.

134. Question Result, ID, References Sat, IM.HC.HCAIDENT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that all locations where a pipeline segment is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate technical justification is provided?*

Assets Covered BP CP Cr & Bu

Result Notes ArcGIS Visual Representation of Spill Modeling Output appears adequate and up-to-date.

135. Question Result, ID, References Sat, IM.HC.HCARELEASE.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include methods to determine the locations and volume of potential commodity releases?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' Segment Identification Process, New Century Software's Spill Impact Analyst (SIA)

136. Question Result, ID, References Sat, IM.HC.HCARELEASE.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that identified release locations and spill volumes are consistent with the documented process?*

Assets Covered BP CP Cr & Bu

Result Notes ArcGIS Visual Representation of Spill Modeling Output appears adequate and up-to-date.

137. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' Segment Identification Process, New Century Software's Spill Impact Analyst (SIA)

138. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that the analysis of overland spread is consistent with the documented process?*

Assets Covered BP CP Cr & Bu

Result Notes ArcGIS Visual Representation of Spill Modeling Output appears adequate and up-to-date.

139. Question Result, ID, References Sat, IM.HC.HCAH2OTRANSP.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include the analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' Segment Identification Process, New Century Software's Spill Impact Analyst (SIA)

140. Question Result, ID, References: Sat, IM.HC.HCAH2OTRANSP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text: *Do records indicate that water transport analysis is consistent with the documented process?*

Assets Covered: BP CP Cr & Bu

Result Notes: ArcGIS Visual Representation of Spill Modeling Output appears adequate and up-to-date.

141. Question Result, ID, References: Sat, IM.HC.HCAAIRDISP.P, 195.452(f)(1) (195.452(a))

Question Text: *Does the process include the analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section Site Specific HCA 'could affect' Determination sub-sub-section HVL Pipelines

142. Question Result, ID, References: Sat, IM.HC.HCAAIRDISP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text: *Do the records indicate that the analysis of air dispersion of vapors is consistent with the documented process?*

Assets Covered: BP CP Cr & Bu

Result Notes: BP Pipelines North America, 2014 Highly Volatile Liquid Aerial Dispersion Study, Revision October 2014.

143. Question Result, ID, References: NA, IM.HC.HCAINDIRECT.P, 195.452(f)(1) (195.452(a))

Question Text: *Does the process include all locations of pipeline segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?*

Assets Covered: BP CP Cr & Bu

Result Notes: BP NA does not use (buffer zone) in General LIMP program

144. Question Result, ID, References: NA, IM.HC.HCAINDIRECT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text: *Do the records indicate that endpoints of pipeline segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?*

Assets Covered: BP CP Cr & Bu

Result Notes: BP NA does not use buffer approach.

145. Question Result, ID, References: Sat, IM.HC.HCACAT3.P, 195.452(f)(1) (195.452(b)(2))

Question Text: *Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' Segment Identification Process, New Century Software's Spill Impact Analyst (SIA) Sub-sub section Segment Identification Verification.

146. Question Result, ID, References: NA, IM.HC.HCACAT3.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(b)(2))

Question Text: *Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered: BP CP Cr & Bu

Result Notes: No category 3 pipelines in the time period of the inspection.

IM.RA: Risk Analysis

147. Question Result, ID, References: NC, IM.RA.RADATA.O, 195.452(b)(5) (195.452(f)(3))

Question Text: *Are field conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*

Assets Covered: BP CP Cr & Bu

Result Notes: Field visits were not performed due to COVAD issues.

148. Question Result, ID, References: Sat, IM.RA.RADATA.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text: *Does the process include an analysis and integration of all available information about the integrity of the entire pipeline and the consequences of a failure?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 5. Information Analysis (Reference Section 195.452(f)(3)), Sub-Section Threat Identification and Information Analysis

149. Question Result, ID, References: Sat, IM.RA.RADATA.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text: *Do the records indicate that all available information has been integrated into the risk analysis?*

Assets Covered: BP CP Cr & Bu

Result Notes: Reviewed Copy of Threat Assessment Data-Copy - Excel for Cherry Point and Ferndale pipe systems. Data analysis appears adequate.

150. Question Result, ID, References: Sat, IM.RA.RAMETHOD.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text: *Does the process include methodology for evaluating risk to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 5. Information Analysis (Reference Section 195.452(f)(3)), Sub-Section Threat Identification and Information Analysis & Risk Reviews

151. Question Result, ID, References: Sat, IM.RA.RARESULTS.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text: *Do the records indicate that the results of the risk analysis process are useful for drawing conclusions and insights for decision making?*

Assets Covered: BP CP Cr & Bu

152. Question Result, ID, References: Sat, IM.RA.RASEGMENT.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text: *Does the risk analysis process consider and incorporate the variation in risk factors along the pipeline such that segment-specific risk results and insights are obtained?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 5. Information Analysis (Reference Section 195.452(f)(3)), Sub-Section Threat Identification and Information Analysis & Risk Reviews

153. Question Result, ID, References: Sat, IM.RA.RAMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(e))

Question Text: *Do the records indicate the evaluation of the methodology(ies) used for evaluating risks to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?*

Assets Covered: BP CP Cr & Bu

Result Notes: Reviewed Copy of Threat Assessment Data-Copy - Excel for Cherry Point and Ferndale pipe systems. Data analysis appears adequate.

Also reviewed Pipeline Integrity Management Review.

IM.CA: Continual Evaluation and Assessment

154. Question Result, ID, References: Sat, IM.CA.ASSESSINTERVAL.P, 195.452(f)(5) (195.452(e), 195.452(g), 195.452(j)(3))

Question Text: *Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 7 - Continuous Evaluation and Assessment (Reference Section 195.452(f)(5)), Re-Assesment Interval Determination (RAID) Process (USPL-GP 43-0001) Rev Level 16Jan2020.

155. Question Result, ID, References: Sat, IM.CA.ASSESSINTERVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(3), 195.452(g))

Question Text: *Do the records indicate that the assessment intervals are consistent with the risks identified for the pipe segment and the results of previous assessments?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed Re-Assessment Interval Determination (RAID) - for Tacoma Junction - Tacoma Delivery Final 2-Dec-20. Review appears adequate.

156. Question Result, ID, References Sat, IM.CA.ASSESSMETHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)

Question Text *Does the process specify assessment methods that are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 7 - Continuous Evaluation and Assessment (Reference Section 195.452(f)(5)), (Sub-Section) Re-Assessment Methodology

157. Question Result, ID, References Sat, IM.CA.ASSESSMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)

Question Text *Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered BP CP Cr & Bu

Result Notes Also reviewed Pipeline Integrity Management - Segment Level Review for Vancouver JCT - Vancouver DL. Nov 8, 2019

158. Question Result, ID, References Sat, IM.CA.ASSESSNOTIFY.P, 195.452(f)(5) (195.452(j)(4), 195.452(m))

Question Text *Does the process include methodology for submitting variance notifications to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 7 - Continuous Evaluation and Assessment (Reference Section 195.452(f)(5)), Re-Assessment Interval Determination (RAID) Process.

159. Question Result, ID, References NA, IM.CA.ASSESSNOTIFY.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(m), 195.452(j)(4))

Question Text *Do the records indicate that variance notifications been submitted to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered BP CP Cr & Bu

Result Notes No assessment interval greater than 5-years

160. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 195.452(f)(5) (195.452(e), 195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text *Does the process include requirements for performing continual evaluations of pipeline integrity?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 7 - Continuous Evaluation and Assessment (Reference Section 195.452(f)(5)).

161. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text *Do records indicate that periodic evaluations of pipeline integrity are being performed and are on a technically justified frequency?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed ILI Assessments - Master History Schedule - Excel, periodic evaluations are performed every 5 years for each segment.

IM.PM: Preventive and Mitigative Measures

162. Question Result, ID, References Sat, IM.PM.PMMMEASURES.P, 195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section III, API Standard 1160)

Question Text *Does the Integrity Management Program include a process for the identification and evaluation of preventive & mitigative measures (P&M measures), resulting from the risk analysis, to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area (HCA)?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 6 - Preventive and Mitigative Measures (Reference Section 195.452(f)(6)),

163. Question Result, ID, References Sat, IM.PM.PMMMEASURES.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section VI, API Standard 1160)

Question Text *Do records demonstrate that the process of identification and evaluation for Preventive & Mitigative Measures (P&M Measures) has been applied in accordance with the documented process?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed sample of Pipeline Integrity Management - Segment Level Reviews for Tacoma JCT - Tacoma Delivery & Vancouver JCT - Vancouver DL

164. Question Result, ID, References NC, IM.PM.PMMIMPLEMENT.O, 195.452(b)(5) (195.452(i)(1), 195.452(i)(2), 195.452(i)(3), 195.452(i)(4))

Question Text *Have preventive and mitigative actions been implemented as described in the records?*

Assets Covered BP CP Cr & Bu

Result Notes Field visits were not performed due to COVAD issues

165. Question Result, ID, References Sat, IM.PM.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))

Question Text *Do the records indicate that mitigative actions have been considered and implemented?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed sample of Pipeline Integrity Management - Segment Level Reviews for Tacoma JCT - Tacoma Delivery & Vancouver JCT - Vancouver DL

166. Question Result, ID, References Sat, IM.PM.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))

Question Text *Do the records indicate that preventive actions have been considered and implemented?*

Assets Covered BP CP Cr & Bu

Result Notes Operator is using preventative measures as required.

167. Question Result, ID, References Sat, IM.PM.PMMRISKANALYSIS.P, 195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section II, API Standard 1160)

Question Text *Does the Integrity Management Program include conducting a risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 5 - Information Analysis (Reference Section 195.452(f)(3))

168. Question Result, ID, References Sat, IM.PM.PMMRISKANALYSIS.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section VI, API Standard 1160)

Question Text *Do records demonstrate that an adequate risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection was performed?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed sample of Pipeline Integrity Management - Segment Level Reviews for Tacoma JCT - Tacoma Delivery & Vancouver JCT - Vancouver DL

169. Question Result, ID, References Sat, IM.PM.IMLEAKDETEVAL.P, 195.452(f)(6) (195.452(i)(3), 195 Appendix C, Section III, API Standard 1160)

Question Text *Does the Integrity Management Program include a process for the evaluation of leak detection capabilities and modifying, as necessary, to protect the high consequence areas?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 6 - Preventive and Mitigative Measures (Reference Section 195.452(f)(6)), Sub-Section Integrity Programs, Paragraph Leak Detection.

170. Question Result, ID, References Sat, IM.PM.IMLEAKDETEVAL.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(3), 195 Appendix C, Section VI, API Standard 1160)

Question Text *Do records indicate that all required and other relevant leak detection evaluation factors have been evaluated to ensure the protection of HCAs?*

Assets Covered BP CP Cr & Bu

171. Question Result, ID, References Sat, IM.PM.PMMEFRD.P, 195.452(f)(6) (195.452(i)(4), 195.452(i)(1), 195.452(i)(2), API Standard 1160)

Question Text *Does the Integrity Management Program include a preventive & mitigative (P&M) measures process that specifically addresses the identification, evaluation, and application of EFRDs to protect high consequence areas in the event of a hazardous liquid pipeline release?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 6 - Preventive and Mitigative Measures (Reference Section 195.452(f)(6)), Sub-Section Integrity Programs, Paragraph Emergency Flow Restrictive Devices (EFRD).

172. Question Result, ID, References: Sat, IM.PM.PMMEFRD.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(4), 195 Appendix C, Section VI, API Standard 1160)

Question Text: *Do the records demonstrate that all required and other relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?*

Assets Covered: BP CP Cr & Bu

Result Notes: Reviewed sample of Pipeline Integrity Management - Segment Level Reviews for Tacoma JCT - Tacoma Delivery & Vancouver JCT - Vancouver DL

IM.FACIL: Facilities

173. Question Result, ID, References: Sat, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: TDC.IMFACIL)

Question Text: *Does the program include a written process for identification of facilities that could affect an HCA?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' determination for Pipeline Facilities.

174. Question Result, ID, References: Sat, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(3)) (also presented in: TDC.IMFACIL)

Question Text: *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*

Assets Covered: BP CP Cr & Bu

Result Notes: Records appear adequate and up to date.

175. Question Result, ID, References: Sat, IM.FACIL.RISKANAL.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text: *Does the process include approaches to identify and evaluate the risks of facilities that can affect HCAs?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 8 - Integrity Management at Facilities

176. Question Result, ID, References: Sat, IM.FACIL.RISKANAL.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text: *Do the records indicate that the analysis of risk of facilities has been performed as required?*

Assets Covered: BP CP Cr & Bu

Result Notes: Reviewed sample of Pipeline Integrity Management - Segment Level Reviews for Tacoma JCT - Tacoma Delivery & Vancouver JCT - Vancouver DL & PROCESS HAZARD ANALYSIS HAZOP/LOPA REPORT, USPL Olympic - South Area FINAL September 2017 Appendix B & C.

177. Question Result, ID, References: Sat, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)

Question Text: *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*

Assets Covered: BP CP Cr & Bu

Result Notes: Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' determination for Pipeline Facilities.

178. Question Result, ID, References: Sat, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)

Question Text: *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*

Assets Covered: BP CP Cr & Bu

Result Notes: ArcGIS Visual Representation of Spill Modeling Output appears adequate and up-to-date.

179. Question Result, ID, References: Sat, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)

Question Text: *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*

Assets Covered: BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section HCA 'could affect' determination for Pipeline Facilities.

180. Question Result, ID, References Sat, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*

Assets Covered BP CP Cr & Bu

181. Question Result, ID, References Sat, IM.FACIL.AIRDISP.P, 195.452(f)(1) (195.452(l)(1)(i))

Question Text *Where the facility handles HVLs or Volatile Liquids, does the process include an analysis of the air dispersion of vapors released from the facility to determine effects on HCAs?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 2. Identification of Pipelines/Segments Affecting a High Consequence Area (Section 195.452(f)(1)) Sub-Section Site Specific HCA 'could affect' Determination, Paragraph HVL Pipelines.

182. Question Result, ID, References Sat, IM.FACIL.AIRDISP.R, 195.452(l)(1)(ii)

Question Text *Where the facility handles HVLs or Volatile Liquids, do the records indicate that the analysis of air dispersion of vapors from the facility is consistent with the process requirements?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines North America, 2014 Highly Volatile Liquid Aerial Dispersion Study, October 2014

183. Question Result, ID, References Sat, IM.FACIL.PERIODEVAL.P, 195.452(f)(5) (195.452(g), 195.452(j)(1), 195.452(j)(2))

Question Text *Does the process include requirements for performing continual evaluations of facility integrity?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 8 - Integrity Management at Facilities.

184. Question Result, ID, References Sat, IM.FACIL.PERIODEVAL.R, 195.452(l)(1)(ii) (195.452(j)(2))

Question Text *Do the records indicate that periodic evaluations of integrity at facilities affecting HCAs have been performed?*

Assets Covered BP CP Cr & Bu

Result Notes BP Vancouver Junction Station Pipeline FIP Program Manual , Executive Summary & BP Tacoma Station Pipeline FIP Program Manual , Executive Summary

185. Question Result, ID, References Sat, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*

Assets Covered BP CP Cr & Bu

186. Question Result, ID, References Sat, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*

Assets Covered BP CP Cr & Bu

Result Notes PROCESS HAZARD ANALYSIS HAZOP/LOPA REPORT, USPL-Ferndale Gas, Cherry Point Crude, and Cherry Point Butane - FINAL April 2019.

187. Question Result, ID, References Sat, IM.FACIL.PMMMITIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered BP CP Cr & Bu

Result Notes BP NA Liquid Integrity Management Plan, Section 5, Information Analysis (Reference Section 195.542(f)(3)) Sub-section Process Hazard Analysis

188. Question Result, ID, References Sat, IM.FACIL.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

Assets Covered BP CP Cr & Bu

Result Notes PROCESS HAZARD ANALYSIS HAZOP/LOPA REPORT, USPL-Ferndale Gas, Cherry Point Crude, and Cherry Point Butane - FINAL April 2019.

189. Question Result, ID, References NC, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: TDC.IMFACIL)

Question Text *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*

Assets Covered BP CP Cr & Bu

Result Notes Field visits were not performed due to COVAD issues.

IM.QA: Quality Assurance

190. Question Result, ID, References Sat, IM.QA.IMPERFEFECTIVE.P, 195.452(f)(7) (195.452(k))

Question Text *Does the process for evaluating IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*

Assets Covered BP CP Cr & Bu

Result Notes Liquid Integrity Management Plan, Section 9 - Program Measures (Reference Section 195.452(f)(7)) & OMER Manual Pipeline Integrity Management Procedure #P-195.452 Section IV(4) Program Measures.

191. Question Result, ID, References Sat, IM.QA.IMPERFEFECTIVE.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

Question Text *Do the records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed 2019 & 2017 IMP Annual Summary for BP NA

192. Question Result, ID, References Sat, IM.QA.RECORDS.P, 195.402(c)(3) (195.452(l)(1))

Question Text *Does the process ensure that the records required for the integrity management program are maintained?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Pipeline Integrity Management Procedure #P-195.452 Section V(5) Documentation.

193. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.P, 195.452(f)(7) (195.452(k))

Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Pipeline Integrity Management Procedure #P-195.452 Section IV(4) Program Measures.

194. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

Question Text *Do the records indicate that performance metrics are providing meaningful insight into integrity management program performance?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed 2019 & 2017 IMP Annual Summary for BP NA

195. Question Result, ID, References Sat, IM.QA.RECORDS.R, 195.452(l)(1)(ii)

Question Text *Do the records indicate that the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity?*

Assets Covered BP CP Cr & Bu

Result Notes Reviewed 2019 & 2017 IMP Annual Summary for BP NA

MO.LO: Liquid Pipeline Operations

196. Question Result, ID, References Sat, MO.LO.OMMANUAL.P, 195.402(a) (195.402(c))

Question Text *Does the operator have an O&M manual, and has a procedure to properly maintain all portions of the manual?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Inspection of Mainline Valves Procedure # P-195.420 Section I(1) Inspection Reports (Book I)

197. Question Result, ID, References Sat, MO.LO.OMHISTORY.P, 195.402(a) (195.402(c)(1), 195.404(a), 195.404(a)(1), 195.404(a)(2), 195.404(a)(3), 195.404(a)(4), 195.404(c)(1), 195.404(c)(2), 195.404(c)(3))

Question Text *Does the process address making construction records, maps, and operating history available as necessary for safe operation and maintenance?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Maps & Records Procedure # P-195.404 Section I(1) Subsection B

198. Question Result, ID, References Sat, MO.LO.OMEFFECTREVIEW.P, 195.402(a) (195.402(c)(13))

Question Text *Does the process address periodically reviewing the work done by the operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Review of Work Done By Operator Procedure # P-195.402(c)(13) Procedure Steps

199. Question Result, ID, References Sat, MO.LO.SRCR.P, 195.402(a) (195.402(f), 195.55(a))

Question Text *Does the procedure include instructions that allow personnel to recognize safety related conditions?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Safety-Related Conditions Procedure #P-195.55 Section I(1) Reporting Criteria Subsection A & B & Exhibit SC-1

200. Question Result, ID, References Sat, MO.LO.PRESSTESTREQ.P, 195.402(c)(3) (195.302(b), 195.302(c))

Question Text *Does the procedure require pressure testing for all lines except as allowed by 195.302(b)?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Hydrostatic Testing Procedure # P-195.300 Section X(10) Risk-Based Alternative.

201. Question Result, ID, References Sat, MO.LO.OPRECORDS.P, 195.402(a) (195.402(c)(3), 195.404(b))

Question Text *Does the process include requirements that operating records that relate to 195.402 activities be maintained?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Maps & Records Procedure # P-195.404 Section I(1) Subsection C

MO.LOOPER: Liquid Pipeline Startup and Shutdown Operations

202. Question Result, ID, References Sat, MO.LOOPER.PRESSURELIMIT.P, 195.402(a) (195.402(c)(7))

Question Text *Does the process include procedures for starting up and shutting down any part of the pipeline system in a manner designed to assure operation within the limits prescribed by 195.406?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Starting Up and Shutting Down the Station Procedure # P-195.402(c)(7) Description:

203. Question Result, ID, References Sat, MO.LOOPER.FAILSAFE.P, 195.402(a) (195.402(c)(8))

Question Text *In the case of a pipeline that is not equipped to fail safe, does the process include procedures for monitoring from an attended location pipeline pressure during startup until steady state pressure and flow conditions are reached and during shut-in to assure operation within the limits of 195.406?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Facilities With No Fail Safe Procedure # P-195.402(c)(9) Section I(1) Fail Safe - BP currently has no facilities that are not Fail Safe.

MO.LMOPP: Liquid Pipeline Overpressure Protection

204. Question Result, ID, References: Sat, MO.LMOPP.PRESSREGTEST.P, 195.402(c)(3) (195.428(a)) (also presented in: FS.PS)

Question Text: *Does the process adequately detail the inspecting and testing of each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Overpressure Safety Devices Procedure # P-195.428(a) Section III(3) Relief Valves, Section IV(4) Control Valves, Section V(5) Switches and Section VI(6) Pressure Transmitters.

MO.LOMOP: Liquid Pipeline MOP

205. Question Result, ID, References: Sat, MO.LOMOP.MOPDETERMINE.P, 195.402(c)(3) (195.302(c), 195.406(a))

Question Text: *Does the process include procedures for establishing the maximum operating pressure allowed in accordance with 195.406(a)?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Maximum Operating Pressure Procedure # P-195.406 Sections I(1) & II(2)

MO.LMOPP: Liquid Pipeline Overpressure Protection

206. Question Result, ID, References: Sat, MO.LMOPP.PRESSREGTESTHVL.P, 195.402(c)(3) (195.428(a)) (also presented in: FS.PS)

Question Text: *Does the process contain procedures for inspecting and testing each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment on HVL pipelines?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Overpressure Safety Devices Procedure # P-195.428(a) Section III(3) Relief Valves, Section IV(4) Control Valves, Section V(5) Switches and Section VI(6) Pressure Transmitters.

207. Question Result, ID, References: Sat, MO.LMOPP.LAUNCHRECVRELIEF.P, 195.402(c)(3) (195.426) (also presented in: FS.PS)

Question Text: *Does the process include requirements for relief devices and their proper use for launchers and receivers?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Scraper & Sphere Facilities (Pigging Pipeline) Procedure # P-195.426 Section I(1) Introduction.

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

208. Question Result, ID, References: Sat, MO.ABNORMAL.ABNORMAL.P, 195.402(a) (195.402(d)(1))

Question Text: *Does the process include procedures for responding to, investigating, and correcting the cause of the listed abnormal operating conditions?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Abnormal Operations Procedure # P-195.402(d) Section I(1) General, Subsection A & Section II(2) Detection, Investigation of and response to alarms (Abnormal Operations)

MO.LM: Liquid Pipeline Maintenance

209. Question Result, ID, References: Sat, MO.LM.VALVEMAINTBIANN.P, 195.402(c)(3) (195.420(b)) (also presented in: FS.VA)

Question Text: *Does the process address inspecting each mainline valve?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Inspection of Mainline Valves Procedure # P-195.420 Frequency

210. Question Result, ID, References: Sat, MO.LM.VALVEMAINT.P, 195.402(c)(3) (195.420(a)) (also presented in: FS.VA)

Question Text: *Does the process adequately address the maintenance program for each valve that is necessary for safe operation of the pipeline system?*

Assets Covered: BP CP Cr & Bu

Result Notes OMER Manual Inspection of Mainline Valves Procedure # P-195.420 Section III(3) Inspection Reports

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

211. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALCHECK.P, 195.402(a) (195.402(d)(2))

Question Text *Does the process include procedures for checking variations from normal operation after abnormal operations have ended at sufficient locations in the system to determine continued integrity and safe operations?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Abnormal Operations Procedure # P-195.402(d) Section VI(6) Follow-Up Action

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

212. Question Result, ID, References Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: PD.RW)

Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Right-of-Way Inspections Procedure # P-195.412 Section IV(4) Right-of-Way Inspections. Company practice is fly pipelines every week (weather and maintenance permitting)

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

213. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALCORRECT.P, 195.402(a) (195.402(d)(3))

Question Text *Does the process include procedures for correcting variations from normal operation of pressure and flow equipment and controls?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Abnormal Operations Procedure # P-195.402(d) Section II(2) Subsection E Flow/Pressure Deviations Outside Normal Limits

MO.LM: Liquid Pipeline Maintenance

214. Question Result, ID, References Sat, MO.LM.VALVEPROTECT.P, 195.402(c)(3) (195.420(c)) (also presented in: FS.VA)

Question Text *Does the process contain criteria for providing protection for each valve from unauthorized operation and from vandalism?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Inspection of Mainline Valves Procedure # P-195.420 Section I (1) Valve Security

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

215. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 1162, Section 8) (also presented in: PD.RW)

Question Text *Does the process address how line markers are to be placed and maintained?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-G 43-0119 Specification for Auxiliary Installations Section 9 Pipeline Markers & Figure B.4A

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

216. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALNOTIFY.P, 195.402(a) (195.402(d)(4))

Question Text *Does the process include procedures for ensuring operating personnel notify responsible operator personnel where notice of an abnormal operation is received?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Abnormal Operations Procedure # P-195.402(d) Section II(2) Subsection C Communication Failure

217. Question Result, ID, References: Sat, MO.ABNORMAL.ABNORMALREVIEW.P, 195.402(a) (195.402(d)(5))

Question Text: *Does the process include procedures for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures for controlling abnormal operation and taking corrective action where deficiencies are found?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Abnormal Operations Procedure # P-195.402(d) Section VII(7) Procedures Effectiveness and Review

MO.LC: Liquid Conversion

218. Question Result, ID, References: Sat, MO.LC.CONVERSION.P, 195.5(a) (195.5(b), 195.5(c))

Question Text: *If any pipelines were converted into Part 195 service, was a process developed addressing all the applicable requirements?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Conversion of Service Procedure # P-195.5 Section I Procedure Steps

PD.DP: Damage Prevention

219. Question Result, ID, References: Sat, PD.DP.ONECALL.P, 195.442(a) (195.442(b))

Question Text: *Does the process require participation in qualified one-call systems?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Damage Prevention Program Procedure # P-195.442 Section I(1) Overview

220. Question Result, ID, References: Sat, PD.DP.PROGRAM.P, 195.442(a)

Question Text: *Does the operator have a damage prevention program approved and in place?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Damage Prevention Program Procedure # P-195.442 Section I(1) Overview

221. Question Result, ID, References: Sat, PD.DP.PUBLICNOTIFY.P, 195.442(a) (195.442(c)(2))

Question Text: *Does the process include public notification requirements?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Damage Prevention Program Procedure # P-195.442 Section V(5) Notification to the Public

222. Question Result, ID, References: Sat, PD.DP.EXCAVATEMARK.P, 195.442(a) (195.442(b), 195.442(c)(4), 195.442(c)(5))

Question Text: *Does the process require marking proposed excavation sites?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Damage Prevention Program Procedure # P-195.442 Section VIII(8) Temporary Marking Method

223. Question Result, ID, References: Sat, PD.DP.EXCAVATE.P, 195.442(a) (195.442(c)(6))

Question Text: *Does the process include inspection of pipelines that could be damaged by excavation activities?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Damage Prevention Program # P-195.442 Section IX(9) Inspection of the Pipeline

224. Question Result, ID, References: Sat, PD.DP.TPD.P, 195.442(a) (195.442(b), 195.442(c)(1))

Question Text: *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Damage Prevention Program Procedure # P-195.442 Section IV(4) Identify Excavators engage in excavation activity.

225. Question Result, ID, References: Sat, PD.DP.TPDONECALL.P, 195.442(a) (195.442(b), 195.442(c)(3))

Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Damage Prevention Program Procedure # P-195.442 Section XI(11) Response to Right-of-Way Encroachments and/or Unauthorized Excavation & Section XII(12) Response to First, Second- and Third-Party Damage

PD.PA: Public Awareness

226. Question Result, ID, References Sat, PD.PA.ASSETS.P, 195.440(b) (API RP 1162, Section 2.7 Step 4)

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program Table 3, adequately describes pipeline systems and facilities.

227. Question Result, ID, References Sat, PD.PA.AUDIENCEID.P, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162 Section 3)

Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program Section 6, Table 6 adequately describes Stakeholder groups that will be contacted.

228. Question Result, ID, References Sat, PD.PA.MGMTSUPPORT.P, 195.440(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text *Does the operator's program documentation demonstrate management support?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program Section 2 is Managements Commitments and Objectives is signed by President of corporation.

229. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 195.440(a) (195.440(h))

Question Text *Has the continuing public education (awareness) program been established as required?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program started on June 20, 2006. Program is reviewed annually.

230. Question Result, ID, References Sat, PD.PA.MESSAGES.P, 195.440(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)

Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where hazardous liquid or carbon dioxide is transported?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program Section 7, Table 6 adequately describes the messages and frequency of contact for each Stakeholder group.

231. Question Result, ID, References Sat, PD.PA.SUPPLEMENTAL.P, 195.440(c) (API RP 1162 Section 6.2)

Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience along all pipeline systems, as described in API RP 1162?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program Section 8 adequately describes Supplemental Enhancements.

232. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 195.440(g) (API RP 1162 Section 2.3.1)

Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program Section 7, Message Type, Frequency and Delivery Methods.

233. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered BP CP Cr & Bu

Result Notes BP Pipelines (North America),Inc., USPL Public Awareness Program Section 10.1 covers Annual Self-assessment.

PD.RW: ROW Markers, Patrols, Monitoring

234. Question Result, ID, References Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: MO.RW)

Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Right-of-Way Inspections Procedure # P-195.412 Section IV(4) Right-of-Way Inspections. Company practice is fly pipelines every week (weather and maintenance permitting)

235. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 1162, Section 8) (also presented in: MO.RW)

Question Text *Does the process address how line markers are to be placed and maintained?*

Assets Covered BP CP Cr & Bu

Result Notes USPL-G 43-0119 Specification for Auxiliary Installations Section 9 Pipeline Markers & Figure B.4A

PD.SN: Facilities Signage and Security

236. Question Result, ID, References Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: FS.FG)

Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Security of Facilities Procedure # P-195.436 Section I(1) Security of Facilities, Sub Section B .

237. Question Result, ID, References Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: FS.FG)

Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Security of Facilities Procedure # P-195.436 Section II(1) Subsection A. Security.

238. Question Result, ID, References Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: FS.FG)

Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Security of Facilities Procedure # P-195.436 Section II(2) Signs

RPT.NR: Notices and Reporting

239. Question Result, ID, References Sat, RPT.NR.NOTIFYIMP.P, 195.452(f)(5) (195.452(j)(4), 195.452(h)(1), 195.452(m))

Question Text *Does the process include a requirement for submitting an IMP notification for each of the following circumstances: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Pipeline Integrity Management Procedure #P-195.452 Section VI(6) PHMSA Notification Process.

240. Question Result, ID, References: NA, RPT.NR.NOTIFYIMP.R, 195.452(l)(1)(ii) (195.452(m), 195.452(j)(4), 195.452(h)(1), 195.452(c)(1))

Question Text: *Do the records indicate that the operator submitted IMP notification(s) for any of the following circumstances, when it was necessary to do so: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered: BP CP Cr & Bu

Result Notes: No notices during the time frame of inspection

RPT.RR: Regulatory Reporting (Traditional)

241. Question Result, ID, References: Sat, RPT.RR.ANNUALREPORTIMINSPECT.R, 195.49

Question Text: *Do the records indicate that the Annual Report Part F Data is complete and accurate?*

Assets Covered: BP CP Cr & Bu

Result Notes: Reviewed Annual Report for BP-OPL (Olympic Pipe Line Company) and Annual Reports for BP Crude & HVL.

242. Question Result, ID, References: Sat, RPT.RR.ANNUALREPORTIMASSESS.R, 195.49

Question Text: *Is Annual Report Part G data complete and accurate?*

Assets Covered: BP CP Cr & Bu

Result Notes: Reviewed Annual Report for BP-OPL (Olympic Pipe Line Company) and Annual Reports for BP Crude & HVL.

243. Question Result, ID, References: Sat, RPT.RR.ACCIDENTREPORT.P, 195.54(a) (195.50(a), 195.50(b), 195.50(c), 195.50(d), 195.50(e))

Question Text: *Does the process require preparation and filing of an accident report as soon as practicable but no later than 30 days after discovery of a reportable accident?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Reporting Accidents Procedure # P-195.50 Section I(1) Accident Reporting

244. Question Result, ID, References: Sat, RPT.RR.ACCIDENTREPORTSUPP.P, 195.402(a) (195.402(c)(2), 195.54(b))

Question Text: *Does the process require preparation and filing of supplemental accident reports?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Reporting Accidents Procedure # P-195.50 Section II(2) Reporting Responsibilities

245. Question Result, ID, References: Sat, RPT.RR.IMMEDREPORT.P, 195.402(a) (195.402(c)(2), 195.52(b), 195.52(c), 195.52(d))

Question Text: *Are procedures in place to immediately report accidents to the National Response Center?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Telephonic Notice of Certain Accident Procedure # P-195.52 Section I(1) General Notification Requirements

246. Question Result, ID, References: Sat, RPT.RR.SRCR.P, 195.402(a) (195.55(a), 195.55(b), 195.56(a), 195.56(b))

Question Text: *Are processes in place to file safety-related condition reports if the conditions of 195.55 are met?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Safety-Related Conditions Procedure # P-195.55 Section III(3) Reporting Procedure

247. Question Result, ID, References: Sat, RPT.RR.OPID.P, 195.64(a) (195.64(c), 195.64(d))

Question Text: *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER National Registry of Pipeline Operators Notifications Procedure # P-195.50 Section I(1) Notification Criteria

TD.ATM: Atmospheric Corrosion

248. Question Result, ID, References: Sat, TD.ATM.ATMCORRODECOAT.P, 195.402(c)(3) (195.581(a), 195.581(b), 195.581(c))

Question Text: *Does the process give adequate instruction for the protection of pipeline against atmospheric corrosion?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Corrosion Control Procedure # P-195.551 Section XV(15) Atmospheric Corrosion and Coating Materials.

249. Question Result, ID, References: Sat, TD.ATM.ATMCORRODEINSP.P, 195.402(c)(3) (195.583(a), 195.583(b), 195.583(c))

Question Text: *Does the process give adequate instruction for the inspection of aboveground pipeline segments exposed to the atmosphere?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Corrosion Control Procedure # P-195.551 Section XVI(16) Monitoring Atmospheric Corrosion

TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection

250. Question Result, ID, References: Sat, TD.CPBO.BO.P, 195.402(c)(3) (195.573(d))

Question Text: *Does the process adequately detail when and how cathodic protection systems will be inspected on breakout tanks?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Corrosion Control Procedure # P-195.551 Section VII(7) Monitoring of Cathodic Protection and Corrosion on Breakout tank Bottoms.

TD.CP: External Corrosion - Cathodic Protection

251. Question Result, ID, References: Sat, TD.CP.MAPRECORD.P, 195.589(a) (195.589(b)) (also presented in: TD.CPMONITOR)

Question Text: *Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Corrosion Control Procedure # P-195.551 Section XIX(19) Maintaining Records and Information

252. Question Result, ID, References: Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text: *Does the process require correction of any identified deficiencies in corrosion control?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Corrosion Control Procedure # P-195.551 Section XI(11) Subsection E Corrective Action

253. Question Result, ID, References: Sat, TQ.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h)) (also presented in: TQ.QU)

Question Text: *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Corrosion Control Procedure # P-195.551 Section I(1) Qualifications

254. Question Result, ID, References: Sat, TD.CP.NEWOPERATE.P, 195.402(c)(3) (195.563(a), 195.563(c), 195.563(d))

Question Text: *Does the process specify when cathodic protection must be operational on constructed, relocated, replaced, or otherwise changed pipelines?*

Assets Covered: BP CP Cr & Bu

Result Notes: OMER Manual Corrosion Control Procedure # P-195.551 Section V(5) Pipelines Required to have Cathodic Protection

255. Question Result, ID, References: Sat, TD.CP.UNPROTECT.P, 195.402(c)(3) (195.563(e), 195.573(b)(1), 195.573(b)(2))

Question Text: *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*

Assets Covered: BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XI(11) Sub-section B Unprotected Pipe

256. Question Result, ID, References Sat, TD.CP.ISOLATE.P, 195.402(c)(3) (195.575(a), 195.575(b), 195.575(c), 195.575(d))

Question Text *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XII(12) Electrical Isolations, Inspections, Tests, and Safeguards

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

257. Question Result, ID, References Sat, TD.CP.MAPRECORD.P, 195.589(a) (195.589(b)) (also presented in: TD.CP)

Question Text *Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XIX(19) Maintaining Records and Information

258. Question Result, ID, References Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text *Does the process require correction of any identified deficiencies in corrosion control?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XI(11) Subsection E Corrective Action

259. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADINSTALL.P, 195.402(c) (195.567(b))

Question Text *Does the process provide adequate instructions for the installation of test leads?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section VIII(8) Test Leads - Installation & Maintenance

260. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADMAINT.P, 195.402(c)(3) (195.567(c))

Question Text *Does the process require that test lead wires must be properly maintained?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section VIII(8) Test Leads - Installation & Maintenance

261. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.P, 195.402(c)(3) (195.571)

Question Text *Does the process require that CP monitoring criteria be used that is acceptable?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section X(10) Criteria Used to Determine the Adequacy of Cathodic Protection

262. Question Result, ID, References Sat, TD.CPMONITOR.TEST.P, 195.402(c)(3) (195.573(a)(1))

Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*

Assets Covered BP CP Cr & Bu

263. Question Result, ID, References Sat, TD.CPMONITOR.CIS.P, 195.402(c)(3) (195.573(a)(2))

Question Text *Does the process adequately describe the circumstances in which a CIS or comparable technology is practicable and necessary no more than 2 years after a cathodic protection system has been installed?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XI(11) Monitoring External Corrosion Control Subsection A Number 2-Close-interval surveys

264. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.P, 195.402(c)(3) (195.573(c))

Question Text *Does the process give sufficient details for making electrical checks of rectifiers, interference bonds, diodes, and reverse current switches?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XI(11) Monitoring External Corrosion Control Subsection C Rectifiers and other devices

265. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.P, 195.402(c)(3) (195.577(a), 195.577(b))

Question Text *Does the operator have a process in place to minimize detrimental effects of interference currents on its pipeline system and do the procedures for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XIII(13) Interference Currents

TD.COAT: External Corrosion - Coatings

266. Question Result, ID, References Sat, TD.COAT.NEWPIPE.P, 195.402(c)(3) (195.557(a), 195.559, 195.401(c))

Question Text *Does the process require coatings for pipelines constructed, relocated, replaced, or otherwise changed after the applicable date in 195.401(c) to meet the requirements of 195.559?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section III(3) Coating Materials

267. Question Result, ID, References Sat, TD.COAT.NEWPIPEINSPECT.P, 195.402(c)(3) (195.561(a), 195.561(b))

Question Text *Does the process require that the coating be inspected on new pipelines just prior to it being lowered into the pipe trench?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section IV(4) Pipe Coating Inspections

TD.CPEXPOSED: External Corrosion - Exposed Pipe

268. Question Result, ID, References Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR)

Question Text *Does the process require correction of any identified deficiencies in corrosion control?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XI(11) Subsection E Corrective Action

269. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 195.402(c)(3) (195.569)

Question Text *Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination required to determine the extent of the corrosion?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section IX(9) Inspections of Exposed Sections of Pipe

270. Question Result, ID, References Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 195.402(c)(3) (195.587)

Question Text *Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XVIII(18) How to Determine the Strength of Corroded Pipe

271. Question Result, ID, References Sat, TD.CPEXPOSED.EXTCORRODEREPAIR.P, 195.402(c)(3) (195.585(a), 195.585(b))

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Repairs, Replacements & Relocations Procedure # P-195.422 Section VI(6) Field Inspection / Evaluation of Pipe Defects

TD.ICP: Internal Corrosion - Preventive Measures

272. Question Result, ID, References Sat, TD.ICP.INVESTREMED.P, 195.402(c)(3) (195.579(a))

Question Text *Does the process give adequate guidance for investigating and remediating the corrosive effects of hazardous liquids or carbon dioxide being transported?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XIV(14) Mitigating Interval Corrosion Subsection A; Number-3 Item ii Monitoring Mitigative Measure Effectiveness

273. Question Result, ID, References Sat, TD.ICP.INHIBITOR.P, 195.402(c)(3) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text *Does the process give adequate direction for the utilization of corrosion inhibitors?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XIV(14) Mitigating Interval Corrosion Subsection A3 Item (i)(e) Chemical or biological inhibitors/treatments

274. Question Result, ID, References Sat, TD.ICP.EXAMINE.P, 195.402(c)(3) (195.579(a), 195.579(c))

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XIV(14) Mitigating Interval Corrosion Subsection A2 Unit i) Inspection of removed pipe.

275. Question Result, ID, References Sat, TD.ICP.EVALUATE.P, 195.402(c)(3) (195.587)

Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section XVIII(18) How to Determine the Strength of Corroded Pipe

TQ.QU: Qualification of Personnel - Specific Requirements

276. Question Result, ID, References Sat, TQ.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h)) (also presented in: TD.CP)

Question Text *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Corrosion Control Procedure # P-195.551 Section I(1) Qualifications

TQ.TRERP: Training of Personnel - Emergency Response

277. Question Result, ID, References Sat, TQ.TRERP.ERCONDITIONS.P, 195.403(a)(3)

Question Text *Are conditions that are likely to cause emergencies, their consequences, and appropriate corrective action identified in the ER training?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergency Response Training Procedure # P-195.403 Section II(2) Emergency Response Training

278. Question Result, ID, References Sat, TQ.TRERP.ERFIREPROT.P, 195.403(a)(5)

Question Text *Are the potential causes, types, sizes, and consequences of fire and appropriate use of portable fire extinguishers and other on-site fire control equipment covered in the ER training?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergency Response Training Procedure # P-195.403 Section II(2) Emergency Response Training

279. Question Result, ID, References Sat, TQ.TRERP.ERHAZTRAINING.P, 195.403(a)(2)

Question Text *Are the characteristics and hazards of the hazardous liquids or carbon dioxide transported covered in the ER training?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergency Response Training Procedure # P-195.403 Section II(2) Emergency Response Training.

280. Question Result, ID, References Sat, TQ.TRERP.ERRELEASECONTROL.P, 195.403(a)(4)

Question Text *Are the steps necessary to control any accidental release of hazardous liquid to minimize the potential for fire, explosion, toxicity, or environmental damage identified in the ER training?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergency Response Training Procedure # P-195.403 Section II(2) Emergency Response Training.

281. Question Result, ID, References Sat, TQ.TRERP.ERTRAINING.P, 195.403(a)(1)

Question Text *Does emergency response training cover the emergency procedures established under 195.402?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergency Response Training Procedure # P-195.403 Section II(2) Emergency Response Training.

282. Question Result, ID, References Sat, TQ.TRERP.ERTRAININGREVIEW.P, 195.403(b)

Question Text *Does the process require review of emergency response personnel performance at the required frequency?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergency Response Training Procedure # P-195.403 Section I(1) Subsection A

283. Question Result, ID, References Sat, TQ.TRERP.ERTRAININGSUPERVISE.P, 195.403(c)

Question Text *Does the process require supervisors be trained on emergency response procedures for which they are responsible?*

Assets Covered BP CP Cr & Bu

Result Notes OMER Manual Emergency Response Training Procedure # P-195.403 Section I(1) Subsection A

Report Parameters: Results: all

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