



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
621 Woodland Square Loop SE, P.O. Box 47250 • Lacey, Washington 98503
P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

Via Email Zach.barrett@dot.gov

July 29, 2022

Zach Barrett
Director, State Programs Office of Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
3700 S MacArthur Blvd, Suite B
Oklahoma City, OK 73179-7612

RE: Washington State Pipeline Safety Program- Response to 2022 Evaluation Letter

Dear Mr. Barrett:

Thank you for your letter dated June 24, 2022. I appreciate the opportunity to update the Pipeline and Hazardous Materials Safety Administration (PHMSA) about the Washington Utilities and Transportation Commission's (UTC) pipeline safety program.

Below is our response to the one issue (item number 1) identified in your letter:

- 1. Our observation of WUTC staff's June 6-8, 2022, inspection of the BP-Olympics' Intrastate Crude Oil and Butane Pipeline facilities revealed that the inspector failed to review records related to right-of-way (ROW) patrolling performed including ROW conditions, markers, crossings, and possible mitigation efforts performed. Only a cursory review of Public Awareness and Damage Prevention elements was conducted and did not encompass calendar years 2019, 2020, and 2021 as intended. Questions, where the record review was not adequate, were marked with a satisfactory result on the inspection form and were communicated as such to the operator during the exit interview. Five points were deducted for not conducting an adequate records review to properly determine operator compliance.**

The commission acknowledges PHMSA's finding that staff did not conduct an adequate records review during the specified inspection of BP-Olympic's intrastate facilities. As a result of this shortcoming, our pipeline safety division leadership implemented a corrective action plan that

Zach Barrett

July 29, 2022

Page 2

included a reinspection of items omitted during the original inspection. Records and field checks during this reinspection were conducted under direct supervision of our Chief Engineer, Scott Rukke.

The program has implemented additional corrective measures including a supervisory review and reinforcement of internal procedures and minimum standards for pre-inspection planning with the inspector in question, as well as additional in-person mentorship opportunities during select inspections for the rest of the CY 2022 work plan. We anticipate that these corrective actions will minimize the likelihood of this oversight reoccurring.

Thank you and David Lykken for your professionalism and courtesy throughout the audit. Mr. Lykken's experience and insights have been particularly valuable as our assigned auditor.

If you have questions about this letter or other pipeline safety matters, please contact Sean Mayo, Director of Pipeline Safety at (360) 664-1219 or sean.mayo@utc.wa.gov. You may also feel free to contact me directly. Thank you for your continued support of our pipeline safety program.

Sincerely,



David W. Danner

Chair

cc: Don Martin, PHMSA State Programs
Dustin Hubbard, PHMSA Western Region Director
David Lykken, PHMSA State Programs