POST INSPECTION MEMORANDUM

Inspector: <u>Kuang Chu, UTC</u> Reviewed: <u>Joe Subsits, UTC</u>

Peer Reviewed:

Follow-Up Enforcement: No Violation PCP* PCO* NOA WL LOC

Director Approval*

Date: May 26, 2011

Operator Inspected:

OPID: 30781 **Region:** Western

BP Olympic Pipe Line Company 2201 Lind Ave. SW, Suite 270 Renton, WA 98057

Unit Address:

2201 Lind Ave. SW, Suite 270 Renton, WA 98057

Unit Inspected: BP Olympic - South

Unit ID: 32965

Unit Type: Interstate Hazardous Liquid

Inspection Type: I01 – Abbreviated Procedures Standard Inspection, I08 – OQ Field

Verification, and I07 – IMP Field Verification & Follow up

Record Location: Renton, WA **Inspection Dates:** May 16 – 20, 2011

AFOD: 5

SMART Activity Number:

Operator Contact: Dave Barnes, DOT Compliance Manager

Unit Description:

The unit starts at the Renton Pump Station (MP 112). The 14" line extends to Portland, Oregon. The main line piping consists of .281" wall thickness, API 5L grade X-52 material, ERW, US Steel made in 1965. There are three pump stations at Tacoma, Olympia, and Castle Rock. There are three intrastate laterals at Tacoma, Olympia (idled), and Vancouver. The pipeline transports refined petroleum products (gasoline, diesel and jet fuel) from north to south.

Facilities Inspected:

The 14" pipeline was inspected from Renton Station to the Columbia River. The field inspection included the Renton Station, Tacoma Junction, Tacoma Pump Station, Olympia Pump Station, Castle Rock Pump Station, and Vancouver Junction. Many cathodic protection test stations, road crossing casings, and numerous rectifiers were inspected. Several mainline valve stations were also inspected and a couple of manual mainline valves were partially operated. All records were reviewed at the Renton Station.

Persons Interviewed:

Persons Interviewed	Title	Phone No.
Dave Barnes	DOT Compliance Manager	(630) 536-3419
Rose Ann Lopez	Area Operations Manager	(425) 227-5213
Kurt Hayashida	NW Engineering Team Leader	(425) 226-8881
James Fraley	Damage Prevention Team Leader	(360) 957-0203
Dave Knoelke	DOT Compliance Consultant	(630) 452-9133

Probable Violations/Concerns:

There were no probable violations found during the inspection. The newly installed MOV station at MP 152 had low CP potential (below -0.850 volts for instant off reading) due to a shorted connection. The MOV was installed in October 2010. The operator is conducting trouble shooting and is very confident that the shorted connection can soon be identified. The downstream induction bend at the same valve station has a wrinkle on the inside radius of the bend. Upon further investigation, the characteristics of the wrinkle met the requirement of section 404.2.3 of ASME B31.4 code. This section was included in BP's OMER (Operations, Maintenance, and Emergency Response manual) Book-1.

Follow up on the history of prior offenses that are still open:

		Prior Offenses (for the past 5 years)
CPF#	What type of open enforcement action(s)?	Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc)

Recommendations:

Maintain normal inspection cycle. No warning letter or letter for areas of concern to be issued to the operator.

Comments: None.

Attachments:

- Abbreviated Procedures-Form 3A Standard Liquid Inspection
- Field Data Collection Form
- OQ Form 15 Field Inspection Protocol
- Form 19 Hazardous Liquid IMP Field Verification Form
- Form 13 PHMSA Pipeline Drug & Alcohol Questions
- Form 17 Supplemental SCC Questionnaire
- Form W 1162 Public Awareness Program Field Audit
- Western Region Unit Information Form

Version Date: 5/5/08