

POST INSPECTION MEMORANDUM

Inspector: Al Jones, UTC / Jerry Kenerson, PHMSA

Reviewed: Joe Subsits, UTC, 6/23/2013

Peer Reviewed: _____

Follow-Up Enforcement: No Violation

PCP* PCO* NOA WL LOC

Director Approval* _____

Date: May 30, 2013

Operator Inspected:

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

OPID: 30781

Region: Western

Unit Address:

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

Unit Inspected: Olympic Pipe Line – North & South

Unit ID: 925 & 32965

Unit Type: Interstate Hazardous Liquid

Inspection Type: O13 - Control Room Management

Record Location: Renton, WA.

Inspection Dates: April 29 – May 2, 2013

AFOD: 9 - Al Jones (4.0), Jerry Kenerson (5.0)

SMART Activity Number: 143079

Operator Contact: Dave Barnes, DOT Compliance Manager

Phone: (630) 536-3419

Fax: (630) 420-5519

Emergency: (888) 271-8880

Unit Description:

The Control Room Management Inspection for Olympic Pipe Line (OPL) for refined petroleum products included the north and south units for a total of 393 miles of pipeline:

Unit Description for OPL - North:

The Control Room monitors delivery from the northern unit of refined petroleum products from refineries located at Cherry Point (BP), Ferndale (Phillips 66) and, Anacortes (Tesoro and Shell). At Cherry Point a five mile, 16" line extends to Ferndale Station. From Ferndale a 37.5 mile, 16" line extends south to Bayview Products Terminal and continues 1.2 miles to Allen Station. At Anacortes a 9 mile, 16" line extends to Bayview Products Terminal and continues to Allen Station. From the Allen Station two parallel lines 16" (0.312" w.t., X-52 pipe, constructed in 1965, MOP 1,440 psig) and 20" (0.250" w.t., X-52 pipe, constructed in 1965, MOP 960 psig) extend south to Renton Station. The 16" line is 49.2 miles from Allen Station to Woodinville Station and continues south for 26.3 miles to Renton Station. The 20" line is 75.5 miles from Allen Station to Renton Station. Compressor stations are located at Ferndale Allen.

Unit Description for OPL - South:

The Control Room monitors delivery of refined petroleum product in the southern unit from the Renton Station to the Washington/Oregon state line. The mainline consist of 14" (0.281" w.t., X-52 pipe, constructed in 1965) with compressor stations at Renton, Tacoma, Olympia, and Castle Rock. The Control Room monitors two lateral intrastate junction facilities located at Tacoma and Vancouver and four intrastate product delivery facilities to West Seattle, Seattle-Tacoma Airport, Tacoma Tide Flats, and Vancouver. The main line crosses the Green River, Puyallup River, Nisqually River, Cowlitz River, and Columbia River.

Facilities Inspected:

The Control Room for Olympic Pipe Line is located at Renton, WA.

Team Members:

Al Jones, UTC - Lead

Jerry Kenerson, PHMSA Western Region

Persons Interviewed:

Persons Interviewed	Title	Phone No.
Jim Bruen	DOT Team Lead	630-536-2535
John Page	DOT Coordinator	918-660-4362
Sandy Cohlan	Control Room Team Leader	425-2275209
Todd Smith	OPL / BP	425-235-7715
Mike Szymanski	Functional OPS Manager	918-660-4303
Ray Barnes	Operations Specialist	425-981-2558
Kelly Loykasek	Operations Training Coordinator	918-660-4359
Gary Medley	Fund. Mgr. – SCADA & Comms.	918-660-4302
Paul Zimmerman	Sr. Consultant	303-819-2457
William Lamm	Planner / Scheduler	425-221-1715

Probable Violations/Concerns:

None

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.

Comments:

During the inspection following two concerns were reviewed with the BP staff:

Allen Station incident (NRC # 1007393):

On March 31, 2012 the Allen Station sampling port/coupling on the 20-inch mainline (MOP of 928 psig) failed and released about 84 gallons of diesel. Pressure data was reviewed by Todd Smith and William Lamm and they confirmed the time (70 minutes) before the failure the PLC (Programmable Logic Controller) correctly transmitted a pressure of 926 psig and the MOP was not exceeded. The SCADA control center was notified of the leak when the Allen station's hydrocarbon alarm was activated. What makes this incident unusual is that for 70 minutes the pressure remained constant at or near the MOP. Prior to this time the pressure varied for 34 hours. Typically, the recorded pressure change was at a frequency of one or two minute increments. PLCs input/output data are programmable! How the PLCs are programed and how they communicate to the SCADA system is beyond the typical PHMSA qualified inspector's training or level of expertise. It is recommended that qualified personnel in electronic PLCs be identified and available to assist in investigations of any future incidents that involve SCADA system(s).

SCADA Procedures:

Despite repeated request, BP would not provide a copy of their Control Room Management (CRM) procedures prior to the date of the inspection. A copy was requested on February 27, 2013 in advance of the inspection to review. On April 11, 2012 David Barnes, DOT Compliance, was contacted regarding the lack of access to BP's procedures. The week before the inspection, Jim Bruen, DOT Compliance Advisor, provided an index of procedure reference number for each inspection question. Without access to BP's procedure, the index was useless.

During the inspection, John Page, BP's DOT Coordinator – Control Centers and chairman for the API Pipeline Conference Coordinating Committee for CRM, presented the majority of CRM's procedures to the IA questions. John used the CRM questions found on PHMSA's website with a link to BP's procedures. The questions are identical to the IA questions except the format. The BP's procedures to the IA question existed before the inspection, but were withheld.

In summary, BP's cooperation in preparing for the Olympic Pipe Line's CRM inspection was not supportive to requests for information. This issue was discussed extensively with BP representatives during the inspection. Specifically, BP's refusal to provide their procedures stymied the opportunity to prepare for an efficient inspection. BP considers their procedures as a proprietary document. In the future, BP needs to be forthright in expressing their intention and make procedures access by an agreement rather than stalling and evading our requests.

CFR 195.446 *Control Room Management (i) Compliance Validation*

Upon request, operators must submit their procedures to PHMSA or in the case of an intrastate pipeline facility regulated by a State, to the appropriate State agency.

Summary:

The PHMSA's Inspection Assistance (IA) form for the CRM is comprehensive and time consuming to complete in a single week. During the inspection, BP was represented by knowledgeable managers and subject matter experts that were prepared for the CRM questions. What was lacking in coordination before the inspection was compensated for, in part, by BP employee's expertise and commitment to their work.

Version Date: 5/5/08