



RECEIVED JUN 04 2015

CN



BP Pipelines (North America) Inc.
150 W. Warrenville Road
Naperville, IL 60563
USA

June 3, 2015

Mr. Bryon Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Rd.
West Trenton, NJ 08628

Re: Notice of Amendment CPF 1-2015-5006M

Dear Mr. Coy,

This letter is in response to Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Notice of Amendment CPF 1-2015-5006M (dated May 1, 2015, and received May 4, 2015).

For ease of response, the code citation and DOT's statements have been copied below in italics and are followed by BP Pipelines (North America) Inc. response.

1. ***§195.402 Procedural manual for operations, maintenance, and emergencies.***
 - (a) ***General. Each operator shall prepare and follow for each pipeline system a manual for written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made a necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.***

DOT Statement:

BP's procedures are inadequate in that they do not provide sufficient guidance regarding the applicability of NFPA 10 - Standard for Portable Fire Extinguishers nor do they provide sufficient guidance on how to document fire extinguisher inspections.

During the inspection, a PHMSA inspector reviewed the following procedures provided by BP:



1. *Generic Maintenance Strategy Fire Detection, Alarm & Suppression Systems, USPL-GMS-016-023 July 2013*
2. *Fire Extinguishers Inspection and Maintenance Procedure, USPL-MAN-732-080, July 30, 2018*

The Generic Maintenance Strategy, Section 2.3, states in part that: "The standards below cover equipment found at USPL facilities, contain recommended guidance on maintenance methods and frequencies, are applicable to the scope of this general strategy:

a. NFPA 10 Standard for Portable Fire Extinguishers"

The Generic Maintenance Strategy does not specifically address what portions of NFPA 10 apply and portions of the Generic Maintenance Strategy appear to contradict the guidance in NFPA 10. For example, the Generic Maintenance Strategy, Section 6.0a states in part that: "A log may be kept instead of using the tag system" while NFPA 10 Paragraph 7.3.3. states in part that "Each fire extinguisher shall have a tag or label securely attached.

The Fire Extinguishers Inspection and Maintenance Procedure does not provide sufficient guidance on conducting fire extinguisher inspections, such as:

1. *What inspection data must be captured, where is the data stored and who is responsible for collecting the data?*
2. *What deficiencies must be remediated, what is the timeframe for remediation, how is the timeframe for remediation determined and who determines it?*

BP Response:

Please be advised that the referenced Generic Maintenance Strategy (GMS) for Fire Detection, Alarm and Suppression Systems, USPL-GMS-016-023, has been revised to address the concerns identified in CPF 1-2015-5006M. Following are the revisions:

- a. Section 5.2, Fire Extinguishers, of the GMS has been updated to identify which portions of NFPA 10 are applicable to the GMS (i.e. Maintenance and Inspection).
- b. Section 6.0, Inspection & Test Report, of the GMS has been updated to clarify the use of inspection logs for monthly fire extinguisher inspections. The statement permitting the use of logs has been moved and amended to clearly identify that it is intended only for recording monthly fire extinguisher inspections. Annual maintenance is recorded via affixed tags or extinguisher shell stamping.



With respect to the concerns identified associated with the Fire Extinguishers Inspection and Maintenance Procedure, USPL-MAN-732-080, please be advised that this document is considered to work in conjunction with the above referenced GMS. Additional language was added to Section 5.2, Fire Extinguishers, of the GMS to direct maintenance personnel to the Maximo Job Plan which contains the specific data required to be collected and recorded within the Maximo Maintenance System. Any deficiencies identified during an inspection shall be remediated in accordance with GMS Section 5.11, Determination of Remedial Action.

BP believes that the practices and actions taken as described in the response herein address the issues identified in the Notice of Amendment.

Should you have any questions or require any further information, please free to contact me at 630-536-3495.

Sincerely,

Michael Sanders
DOT Team Leader
BP Pipelines (North America) Inc.

Enclosures

cc: Don Porter - Business Unit Leader, BP Pipelines (North America) Inc.
Clorinda Nothstein - Performance Unit Leader, BP Pipelines (North America) Inc.