



**U.S. Pipelines and Logistics**

**BP Pipelines (North America) Inc.  
30 S. Wacker Drive, 9th Floor  
Chicago, Illinois 60606**

February 19, 2021

**VIA EMAIL**

Mr. Gregory Ochs  
Director, Central Region  
U.S. Department of Transportation  
PHMSA, Office of Pipeline Safety  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

**Re: CPF No. 3-2021-004-NOA**

Dear Mr. Ochs:

BP Pipelines (North America) Inc. is writing in response to the referenced Notice of Amendment (NOA) letter, received in our offices on January 29, 2021, regarding the August 3, 2020 through October 16, 2020 inspection of the Olympic Pipeline system.

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 Procedure manual for operations, maintenance, and emergencies.  
(a) Procedural manual for operations, maintenance, and emergencies.***

***DOT Statement:***

*Olympic's Operations and Maintenance (O&M) manual failed to address criteria for repairs in a high consequence area (HCA) and is therefore inadequate to comply with §§ 195.402(c)(3) and 195.452(f). Olympic's repair procedure, P 195.422, directs Olympic personnel or contractors to follow the ASME B 31.4 repair criteria in HCAs. Section 195.402(c)(3) requires an operator to include in the O&M manual procedures for "operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart [subpart F] and subpart H of this part." Section 195.452(f), which is included within subpart F, governs what must be included in an operators' integrity management program, and that section specifically references § 195.452(h) as the regulatory section controlling remedial actions to address integrity issues in HCAs. These regulatory sections taken together require operators to include the repair criteria specified in § 195.452(h) in a written Integrity Management program. The omission of a reference to the repair criteria under § 195.452(h) for repairs in HCAs renders the procedure inadequate to comply with the regulation.*

**BP Response:**

Please be advised that the referenced O&M procedure, P-195.422 - *Repairs, Replacement and Relocations*, is being revised to address the concerns identified in CPF 3-2021-004-NOA. Following are the planned revisions:

- Elimination of the footnote in Exhibit RR-1 stating that repairs are not required by ASME B31.4 for smooth dent  $\leq 6\%$
- Elimination of the language in Section V(C)(2) which defines the dent conditions requiring repair or replacement

Procedure P-195.422 Section V will now direct personnel to reference technical practice USPL-GP 32-0200 for direction on remedial actions to address integrity issues in HCA as governed by 195.452(h). USPL-GP 32-0200 Section 7.2(c) states that dents located on top of the pipeline (above the 4 & 8 o'clock position) with a depth greater than 2 % of nominal diameter (0.250" deep for < 12" NPS) are required to be evaluated and remediated within 180 days of discovery of the condition.

BP believes that the practices and actions taken as described in the response herein address the issues identified in the Notice of Amendment. BP would be happy to run through these procedural changes with PHMSA staff, if desired.

Should you have any questions or require any further information, please free to contact me at 331-239-9745.

Sincerely,

*Timothy J.R. Smith*

Timothy J.R. Smith  
Compliance Manager  
BP Pipelines (North America) Inc.

cc: John D'Andrea - Vice President, BP Pipelines (North America) Inc.