

July 26, 2021

**VIA ELECTRONIC MAIL TO: john.dandrea@bp.com**

Mr. John D'Andrea  
Vice President  
BP Pipelines (North America) Inc.  
30 S. Wacker Drive, 9<sup>th</sup> Floor  
Chicago, Illinois 60606

**Re: CPF No. 5-2021-024-NOPV**

Dear Mr. D'Andrea:

Enclosed please find the Final Order issued in the above-referenced case. It makes findings of violation against your subsidiary, Olympic Pipe Line Company, and specifies actions that need to be taken to comply with the pipeline safety regulations. When the terms of the compliance order are completed, as determined by the Director, Western Region, this enforcement action will be closed. Service of the Final Order by electronic mail is effective upon the date of transmission as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

Enclosures (Final Order and NOPV)

cc: Mr. Dustin Hubbard, Director, Western Region, Office of Pipeline Safety, PHMSA  
Mr. Timothy J.R. Smith, Compliance Manager, BP Pipelines (North America) Inc.,  
timothy.smith@bp.com

**CONFIRMATION OF RECEIPT REQUESTED**

**U.S. DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
OFFICE OF PIPELINE SAFETY  
WASHINGTON, D.C. 20590**

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**In the Matter of** )

**Olympic Pipe Line Company,** )  
**a subsidiary of BP Pipelines (North America) Inc.,** )

**Respondent.** )  
\_\_\_\_\_ )

**CPF No. 5-2021-024-NOPV**

**FINAL ORDER**

On June 11, 2021, pursuant to 49 C.F.R. § 190.207, the Director, Western Region, Office of Pipeline Safety (OPS), issued a Notice of Probable Violation (Notice) to Olympic Pipe Line Company, a subsidiary of BP Pipelines (North America) Inc. (Respondent). The Notice proposed finding that Respondent had violated the pipeline safety regulations in 49 C.F.R. Part 195. The Notice also proposed certain measures to correct the violations. Respondent did not contest the allegations of violation or corrective measures.

Based upon a review of all of the evidence, pursuant to § 190.213, I find Respondent violated the pipeline safety regulations listed below, as more fully described in the enclosed Notice, which is incorporated by reference:

49 C.F.R. § 195.446 (**Item 1**) — Respondent failed to test and verify its internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months. Specifically, Respondent could not produce documentation that its internal communication plan had been tested at the requisite intervals or procedures requiring such testing.

These findings of violation will be considered prior offenses in any subsequent enforcement action taken against Respondent.

**COMPLIANCE ACTIONS**

Pursuant to 49 U.S.C. § 60118(b) and 49 C.F.R. § 190.217, Respondent is ordered to take the actions proposed in the enclosed Notice to correct the violations. The Director may grant an extension of time to comply with any of the required items upon a written request timely

submitted by the Respondent and demonstrating good cause for an extension. Upon completion of ordered actions, Respondent may request that the Director close the case. Failure to comply with this Order may result in the assessment of civil penalties under 49 C.F.R. § 190.223 or in referral to the Attorney General for appropriate relief in a district court of the United States.

**WARNING ITEM**

With respect to Item 2, the Notice alleged probable violation of 49 C.F.R. § 195.402 but did not propose a civil penalty or compliance order for this item. Therefore, this is considered to be a warning item. If OPS finds a violation of this provision in a subsequent inspection, Respondent may be subject to future enforcement action.

The terms and conditions of this order are effective upon service in accordance with 49 C.F.R. § 190.5.

July 26, 2021

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Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

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Date Issued