



U.S. Terminals and Pipelines

BP Pipelines (North America) Inc.
30 S. Wacker Drive, 10th Floor
Chicago, Illinois 60606

January 17, 2025

VIA EMAIL

Mr. Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: CPF No. 3-2024-080-NOA

Dear Mr. Ochs:

BP Pipelines (North America) Inc. (bp) is writing in response to the referenced Notice of Amendment (NOA) letter, received in our offices on December 23, 2024, regarding the September 23 to 27, 2024 inspection of BP Pipelines (North America), Inc. hazardous liquid pipeline system. For ease of response, the code citation and PHMSA's statement have been copied below in italics and are followed by the bp response.

1. § 195.452 Pipeline integrity management in high consequence areas.

(a)

(h) What actions must an operator take to address integrity issues?

(1)

(4) Special requirements for scheduling remediation —

(i) Immediate repair conditions. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce the operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formulas referenced in paragraph (h)(4)(i)(B) of this section. If no suitable remaining strength calculation method can be identified, an operator must implement a minimum 20 percent or greater operating pressure reduction, based on actual operating pressure for two months prior to the date of inspection, until the anomaly is repaired. An operator must treat the following conditions as immediate repair conditions:

(A)

(C) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) that has any indication of metal loss, cracking or a stress riser.

Finding:

BP's written process for scheduling the evaluation and remediation of immediate repair conditions in high consequence areas (HCAs) was inadequate to address the requirements of § 195.452(h)(4)(i)(C). Specifically, section 7.2 of BP's Technical Practice document, USPL-GP 32-200, entitled, "In-Line Inspection (ILI) Data Evaluation and Resulting Repair Program Procedures for ILI Repair Projects" (July 14, 2024), did not adequately describe the criteria for the excavation, inspection and repair of topside dents (above the 4 and 8 o'clock positions) of a regulated liquid pipeline that have any indication of metal loss, cracking or a stress riser. Section 7.2 categorizes anomalous conditions into seven categories where "Category (1) Conditions" are intended to identify immediate repair conditions regardless of the location of the condition (HCA or Non-HCA). However, the criteria provided for treating a topside dent with an indication of metal loss, cracking, or stress riser as a "Category (1) Condition" is specific to pipeline segments that are either subject to very aggressive cyclic operating conditions or those segments that are not subject to very aggressive cyclic conditions, but whose topside dents are greater than or equal to 1 percent of nominal diameter. These criteria are inconsistent with the regulatory requirement of treating any topside dent with a metal loss, cracking, or stress riser indication as an immediate repair condition, as required by § 195.452(h)(4)(i)(C). BP's Technical practice document, therefore, has to be amended to address the requirement for properly classifying a topside dent with a metal loss, cracking, or stress riser indication as an immediate repair condition in HCA in accordance with § 195.452(h)(4)(i)(C).

bp Response

As a result of this finding, bp will modify section 7.2(a)(3) of procedure USPL-GP 32-0200, *In-Line Inspection (ILI) Data Evaluation and Resulting Repair Program Procedures for ILI Repair Projects*, to state that a Category 1 (Immediate) Condition includes "Any topside dent (above the 4 & 8 o'clock positions) with an indication of metal loss, cracking, or stress riser".

7.2 Excavation and Inspection or Repair Criteria for Liquid Pipelines

a. Category 1 Conditions

3. Any topside dent (above the 4 & 8 o'clock positions) with an indication of metal loss, cracking, or stress riser.

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: Chris Vodicka - Vice President, BP Pipelines (North America) Inc.