



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

8701 South Gessner, Suite 1110  
Houston, TX 77074

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 20, 2007

Jim Lamanna  
BP Pipelines (North America Inc)  
28100 Torch Parkway  
MC 644B  
Warrenville, IL 60555

**CPF No. 4-2007-5051M**

Dear Mr. Lamanna:

On September 11-14, 2007, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code inspected your procedures for operations and maintenance in Warrenville, IL.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within BP Pipelines' (BP) procedures and are described below:

1. **§195.222 Welders: Qualification of welders. (b) No welder may weld with a welding process unless, within the preceding 6 calendar months, the welder has--**
  - (1) Engaged in welding with that process; and
  - (2) Had one welded tested and found acceptable under section 9 of API 1104

BP's O&M manual incorrectly indicates that under certain circumstances that a welder's qualification may be extended beyond the 6 month requirement (not to exceed 30 additional days, at the discretion of the Company Construction Coordinator). BP needs to amend their O&M manual to correctly address welder qualification requirements.

2. **§195.555 What are the qualifications for supervisors? You must require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under Sec. 195.402(c)(3) for which they are responsible for insuring compliance.**

BP's O&M manual needs to indicate the qualifications for the corrosion control supervisor and state how a supervisor will maintain a thorough knowledge of corrosion control procedures. Additionally, BP's O & M does not clearly indicate how BP will verify supervisor's knowledge of corrosion control procedures.

3. **§195.561 When must I inspect pipe coating used for external corrosion control?**  
(a) **You must inspect all external pipe coating required by Sec. 195.557 just prior to lowering the pipe into the ditch or submerging the pipe.**

BP's O&M Procedure 195.551 Item D 1 should be expanded to include more details associated with coating inspection prior to lowering pipe into the ditch; i.e. (visual/electrical).

4. **§195.567 Which pipelines must have test leads and what must I do to install and maintain the leads? (c) Maintenance. You must maintain the test lead wires in a condition that enables you to obtain electrical measurements to determine whether cathodic protection complies with Sec. 195.571.**

BP's O&M manual needs to indicate that damaged test leads shall be repaired by at least the next inspection cycle.

BP submitted its amended procedures to this office on November 2, 2007, prior to the delivery of this Notice. My staff reviewed the amended procedures, and it appears that the inadequacies outlined in this Notice of Amendment has been corrected.

This letter is to inform you no further action is necessary and this case is now closed. Thank you for your cooperation.

#### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF No. 4-2007-5051M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "R. M. Seeley". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous  
Material Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance*