SECTION VII: Return to Service

1. Agency Jurisdiction:

DOT-OPS administers the regulations at 40 CFR Part 194 for the response plans for onshore oil pipelines. BLM administers the Federal Agreement and Grant of Right of Way for TAPS and ADNR administers the State Right of Way Lease for TAPS, both of which address pipeline integrity and the safe operations of TAPS.

2. Overall Background:

This section deals less with the response to spilled oil, but more with the safe return to service of the pipeline. TAPS is a national asset. Loss of service for extended periods may cause disruptions in fuel supplies for Alaska and the West Coast. The degree of disruption is related to the length of time the pipeline is shut down. This must be balanced against assuring safe operation of the pipeline. All of the requirements to ensure safe operation and pipeline integrity must be in place prior to restart. Those requirements include a suitable repair and resolution of any integrity issues that may have arisen during the event.

For this event, the selection of the repair method, the repair itself, the restart and the agency coordination all proceeded in a timely and acceptable manner. There were no other integrity issues. This section is included due to issues that never occurred, but in the future, might.

3. Observations and Recommendations:

A. Permanent Repairs

Background:
There are many criteria that apply to selecting an acceptable repair of the pipeline prior to restart. First and most immediate are APSC's own manuals, which describe design and operating requirements for the pipeline and its systems. These manuals include procedures for inspection of the damaged area of the pipe, procedures and approvals for pipe repair methods and materials, and post repair inspection procedures and documentation. The APSC manuals are written to ensure conformance with applicable industry standards (e.g., American Petroleum Institute and National Association of Corrosion Engineers) and applicable regulations. Regulations include those administered by DOT-OPS (40 CFR Part 195) and the terms of the Federal Agreement and Grant of Right of Way, and the State Right of Way Lease.

Observations: Because of the degree of pressure reduction and the nature of the damage, APSC was able to install a standard pipeline fitting (known as a Threaded O-Ring (TOR)) using previously approved welding procedures. The fitting and its installation met all of APSC's operating requirements and satisfied all regulatory requirements.

Because of the nature of the leak, there were no other integrity issues that would have affected the decision to restart the line.

Prior to the decision to install a TOR, there were discussions of different options for repair. Since there are additional agencies involved with TAPS repair and startup that are not closely involved with the oil spill response, a significant amount of time was spent coordinating with agency personnel not at the EOC.

Recommendations: See observations and recommendations under the Incident Command System (ICS) Section, Unified Command, page I-2.

Figure VII-1: Permanent repair (Threaded O-Ring)

B. TAPS Restart Process

Background:
After completion of the repairs and satisfactory resolution of all integrity issues, operations were resumed. There have been occasional problems associated with pipeline restart including recent oil spills. Generally, those problems have been associated with work done while the pipeline was shutdown as opposed to related to the actions taken to restart the line. Nevertheless, the pipeline operator must adapt the startup sequence to the condition of the line when it was shutdown.

Observations: The restart of the pipeline was conducted using established procedures and approval protocols. The startup sequence took into account the actions taken during the initial shutdown and the subsequent draindown activities required for the repair of the pipe. Prior to the startup, all mainline valves were returned to the respective normal positions for pipeline operation and slack segments of the pipeline were refilled under controlled conditions.

After establishing an open flow path from Pump Station1 to the Valdez Marine Terminal, the pipeline startup was initiated at 3:24 AM on October 7, 2001. The startup sequence began with the start of a mainline pump at Pump Station 1. As pressure and flow began to be restored in the pipeline system, the pumps at the downstream pumping stations, beginning with Pump Station 3, were sequentially brought on line. The mainline startup culminated at 7:35 AM with the start up of a mainline pump at Pump Station 12. The pipeline startup was without incident and was witnessed by an Agency observer at the OCC in Valdez.

Recommendation: Continue current practices.

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