

Inspection Output (IOR)

Generated on 2020.October.08 10:37

Inspection Information

Inspection Name	Tidewater IMP (8077)	Operator(s)	TIDEWATER, INC (31051)	Plan Submitted	08/26/2020
Status	LOCKED	Lead	Dennis Ritter	Plan Approval	08/31/2020 by Joe Subsits
Start Year	2020	Team Members	Derek Norwood	All Activity Start	04/13/2020
System Type	HL	Observer(s)	Scott Rukke, David Cullom, Lex Vinsel, Anthony Dorrough, Deborah Becker, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity End	04/16/2020
Protocol Set ID	HL.2020.01	Supervisor	Joe Subsits	Inspection Submitted	09/08/2020
		Director	Sean Mayo	Inspection Approval	10/01/2020 by Sean Mayo

Inspection Summary

Inspection Scope and Summary

This inspection included a review of Tidewater's Integrity Management Plan which covers the 6" Inbound/Outbound system, 4" Pasco Diesel Rail Line and breakout tanks at the Snake River Terminal. Associated records were reviewed and staff attended the In-Line Inspection of the 6" Inbound/Outbound System on May 13, 2020. No anomalies were called out by the MFL/Caliper tool but confirmation digs are scheduled later this year.

As a result of the inspection, UTC staff noted 6 probable violations as described in the Inspection--**NOTE, there are 8 probable violations noted in the inspection, however, two are repeated questions for the same violation. The actual number of probable violations is 6.**

Facilities visited and Total AFOD

Inspection was conducted remotely via Microsoft Teams on August 3-4, 2020. Staff also visited the Snake River Terminal on May 13, 2020 for the In-Line Inspection.

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

Significant findings are with regard to integrity managements processes for breakout tanks at Snake River Terminal along with associated records. Tidewater's Integrity Management Plan is missing processes for P&M measures, continual evaluations and risk assessments with regard to breakout tanks. They are also missing records for risk assessments of breakout tanks and measuring program effectiveness.

Primary Operator contacts and/or participants

Ron McClary

509-547-7701

rmccclary@tidewater.com

Mark Davis

509-547-7701

Operator executive contact and mailing address for any official correspondence

Bill Collins
 Director EHS&S
 6305 NW Old Lower River Rd
 Vancouver, WA 98660

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88982 (1019)	Tidewater - Snake River Terminal	unit	88982	--	142	142	142	142	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	88982 (1019)	HL IM Implementation, HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	O, R, P	Detail

Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	IMP	--	04/13/2020	04/16/2020	n/a	all planned questions	all assets	all types	142	142	142	142	100.0%

- 1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
- 2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	IMP	COMPLETED	08/27/2020	IMP	--

Results (Unsat, Concern values, 6 results)

8 (instead of 6) results are listed due to re-presentation of questions in more than one sub-group.

TDC.IMFACIL: Integrity Management for Facilities (Re-Presented)

- 1. Question Result, ID, References **Unsat, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i))** (also presented in: IM.FACIL)
 Question Text *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*
 Assets Covered **88982 (1019)**
 Result Issue Summary **Tidewater's Plan does not include a process to identify preventive measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.**

Standard Issues B2 : 195.452(f)(6) : Process does not require that potential preventive actions that address the most significant facility risks were identified, including consideration of preventive actions listed in 195.452(i)

Result Notes Tidewater's Plan does not include a process to identify preventive measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.

2. Question Result, ID, References Unsat, IM.FACIL.PMMMITIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered 88982 (1019)

Result Issue Summary Tidewater's Plan does not include a process to identify mitigative measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.

Standard Issues B2 : 195.452(f)(6) : Process does not require consideration of the consequences applicable to facilities that may be different for the pipeline consequences

Result Notes Tidewater's Plan does not include a process to identify mitigative measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.

IM.FACIL: Facilities

3. Question Result, ID, References Unsat, IM.FACIL.RISKANAL.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text *Does the process include approaches to identify and evaluate the risks of facilities that can affect HCAs?*

Assets Covered 88982 (1019)

Result Issue Summary Tidewater's Integrity Management Plan does not incorporate the breakout tanks at Snake River Terminal into their risk assessment.

Standard Issues B2 (Moderate or small impact/limited occurrence) : 195.452(f)(3) : No process.

Result Notes Tidewater's Integrity Management Plan does not incorporate the breakout tanks at Snake River Terminal into their risk assessment.

4. Question Result, ID, References Unsat, IM.FACIL.RISKANAL.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text *Do the records indicate that the analysis of risk of facilities has been performed as required?*

Assets Covered 88982 (1019)

Result Issue Summary Tidewater had no records to indicate that risk analysis has been completed for the breakout tanks at SRT. Tidewater regularly conducts a risk analysis for the pipelines but no records were available for breakout tank risk analysis.

Standard Issues B2 (Moderate or small impact/limited occurrence) : 195.452(l)(1)(ii) : Records do not demonstrate that facility risk analysis was adequately completed

Result Notes Tidewater had no records to indicate that risk analysis has been completed for the breakout tanks at SRT. Tidewater regularly conducts a risk analysis for the pipelines but no records were available for breakout tank risk analysis.

5. Question Result, ID, References Unsat, IM.FACIL.PERIODEVAL.P, 195.452(f)(5) (195.452(g), 195.452(j)(1), 195.452(j)(2))

Question Text *Does the process include requirements for performing continual evaluations of facility integrity?*

Assets Covered 88982 (1019)

Result Issue Summary Tidewater's Plan does not include a process to perform continual assessment and evaluation of the breakout tanks at the SRT.

Standard Issues B2 : 195.452(f)(5) : The process did not include a continual evaluation process for facilities

Result Notes Tidewater's Plan does not include a process to perform continual assessment and evaluation of the breakout tanks at the SRT.

6. Question Result, ID, References Unsat, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*

Assets Covered 88982 (1019)

Result Issue Summary Tidewater's Plan does not include a process to identify preventive measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.

Standard Issues B2 : 195.452(f)(6) : Process does not require that potential preventive actions that address the most significant facility risks were identified, including consideration of preventive actions listed in 195.452(i)

Result Notes Tidewater's Plan does not include a process to identify preventive measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.

7. Question Result, ID, References Unsat, IM.FACIL.PMMMMITIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered 88982 (1019)

Result Issue Summary Tidewater's Plan does not include a process to identify mitigative measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.

Standard Issues B2 : 195.452(f)(6) : Process does not require consideration of the consequences applicable to facilities that may be different for the pipeline consequences

Result Notes Tidewater's Plan does not include a process to identify mitigative measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.

IM.QA: Quality Assurance

8. Question Result, ID, References Unsat, IM.QA.IMPERFEFFECTIVE.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

Question Text *Do the records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*

Assets Covered 88982 (1019)

Result Issue Summary Records to indicate that program effectiveness is being evaluated were insufficient. Section 4.1 of the Plan has a list of measures to assess effectiveness but it is unclear if Tidewater is collecting all of this data and how they use the data to evaluate effectiveness of the Integrity Management Program.

Standard Issues B2 (Moderate or small impact/limited occurrence) : 195.452(l)(1)(ii) : Records did not demonstrate that periodic self-assessments, internal and/or external audits, management reviews, or other evaluations to measure program effectiveness were performed

Result Notes Records to indicate that program effectiveness is being evaluated were insufficient. Section 4.1 of the Plan has a list of measures to assess effectiveness but it is unclear if Tidewater is collecting all of this data and how they use the data to evaluate effectiveness of the Integrity Management Program.

Report Parameters: Results: Unsat, Concern

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.