S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Inspection Checklist, Cover Letter and Field Report, IMP and OQ Field Validation Forms** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

	Inspection Report							
Inspection ID/	8079							
Docket Number								
Inspector Name & Submit Date	Derek Norwood							
Chief Engineer Name &	Joe Subsits 9/23/2020							
Review Date								
	Operator Information							
Name of Operator:	Tidewater Terminal Company		OPID #:	31051				
Name of Unit(s):	Snake River Terminal							
Records Location:	Records Location: Pasco, WA							
Date(s) of Last Review:	July 2018	Inspection Date(s) June 15-16 & Au 2020		& Aug 31,				

## **Inspection Summary:**

This inspection was conducted remotely via Microsoft Teams for the records portion and the field portion was conducted in person in Pasco, WA. The records were inspected one June 15-16, 2020 and the field inspection was conducted on August 31, 2020. Records included O&M activities, emergency response, OQ, reporting, etc. Field inspection included CP, rectifiers, valves, overfill protection and general facility inspections. Facilities included the Inbound/Outbound system, Pasco Rail Diesel Line and breakout tanks at Snake River Terminal.

HQ Address:			System/Unit Address:	
6305 NW Old Lower Rive Vancouver, WA 98660	er Rd		671 Tank Farm Rd Pasco, WA	
Co. Official: Phone No.: Fax No.: Emergency Phone No.:	Bill Collins 360-759-0306		Phone No.: Fax No.: Emergency Phone No.:	
Persons Int	erviewed		Title	Phone No.
Ron Mc		Term	inal Maintenance Manager	509-547-7701
Josh Jai	rman	Qualit	y and Compliance Manager	360-759-0338
Mark D	Davis		General Manager	509-547-7701
	·			·
			·	

Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues?	Yes ⊠	No□
Comments: Annual reports submitted on time and appeared to be complete and consistent with Integrity Man	agement ass	sessment schedule

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# UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.

(check one below and enter appropriate date)

Team inspection was performed (Within the past five years.) or,	Date:	July 2018
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	
Any revisions to O&M manual since last review? Yes X No If yes, review revisions made.		

#### **Comments:**

Updated NACE references and removed some appendices

	REPORTING				
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	X		
2.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted?  Submitted April 2019	X		
3.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction Inbound/Outbound system re-routed in 2018, notification made to UTC prior to construction	X		
4.	480-75-620	Was MOP changed based on hydrotest? Report submitted? MOP was not changed		X	
5.	480-75-630(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours of discovery) for events which results in; a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection.  Tidewater has had no reportable incidents		х	
6.	480 <b>-75-630(2</b> )	Written reports to the commission within 30 calendar days of the incident. The report must include the following:  a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged;  (b) The extent of injuries and damage;  (c) A description of the incident including date, time, and place;  (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident;  (e) The date and time the pipeline returns to safe operations; and  (f) The date, time, and type of any temporary or permanent repair.  Tidewater has had no reportable incidents		Х	
7.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes  Tidewater has had no accidents since the last standard inspection		Х	

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8.	195.442(c)(6)	Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence?		X	
		Tidewater has had no accidents since the last standard inspection			
9.	480-75-630(3)	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline.  None of these events occurred on Tidewater's system		X	
10.	49 CFR 195.402	Did the operator follow written procedures pertaining to notification of excavation, marking, positive response ant the availability and use of the one call system?  Reviewed sampling of one-call tickets. All locates completed within two days as required	X		
11.	442(c)(6)	Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? Section 208.2(c)	X		
12.	480-75-630(4)	Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013)  (Via the commission's Virtual DIRT system or on-line damage reporting form)			
13.	480-75-630(4)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)		X	
14.	480-75-630(4)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed?		X	
15.	480-75-630(4)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed?  Note: Records maintained for two years and made available to the commission upon request.		X	
16.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities?			
17.	480-75-630(5)(a)	Notification requirements for excavators under RCW 19.122.050(1)		X	
18.	480-75-630(5)(b)	A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and		X	
19.	480-75-630(5)(c)	Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.		X	
20.	480-75-630(6)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities  • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (630(6)(a)  • A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b)		X	
21.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)		X	
22.	Damage Prevention	Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?		X	
23.	(Operator Internal Performance Measures)	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?		X	
24.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X		
25.	Questions	Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X		
26.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X		
27.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X		

 $S-Satisfactory \quad U-Unsatisfactory \quad N/A-Not\ Applicable \quad N/C-Not\ Checked$  If an item is marked U, N/A, or N/C, an explanation must be included in this report.

## **Comments:**

- Items 12-20: None of these events have occurred since the last standard inspection
- Items 21-22: Tidewater conducts all locates using company personnel, no contractors

		OPERATION & MAINTENANCE	S	U	NA	NC
28.	480-75-620	Change in MOP? Changed based on hydrotest?  Tidewater has not changed their MOP since the last standard inspection			X	
29.	480-75-640	Depth of cover surveys and mitigation Not performed since last standard inspection, 2016 for Inbound/Outbound, 2018 Diesel line			X	
30.	480-75-500	Pipe movement study per API 1117  Tidewater has not moved or lowered their pipelines			X	
31.	480-75-300 (3)	Leak detection and alarm records	X			
32.	480-75-320	Surge analysis done? Surge analysis conducted in 2000 for Inbound/Outbound, 2013 for Pasco Rail Diesel Line	X			

	CORROSION CONTROL			U	NA	NC
33.	480-75-510	Corrosion remediation within 90 days Following the ILI in May 2020, Tidewater has noticed low reads on the Inbound/Outbound system. This is due to metal shavings and bristles from the pig which is shorting their isolation from Marathon. They have drained and cleaned the line twice since the ILI.	X			

Comments:		

	FIELD REVIEW		S	U	N/A	N/C
34.	480-75-540	Markers at exposed areas Valve at BNSF had Tidewater contact info	X			
35.	480-75-320	Relief Device set at or below MOP Relief for Inbound/Outbound set at 155 psig, MOP is 285	X			
36.	480-75-300	Leak Detection – 8% in 15 Minutes  Not performed during inspection			X	
37.	480-75-300	Leak detection at flow and no flow conditions  Not performed during inspection			X	
38.	480-75-330	Do Breakout Tanks have independent overfill alarms?  Reviewed procedure with field personnel	X			

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Comments:		

EXIT INTERVIEW		
Exit interview conducted? Yes Issues addressed: Discussed field sites visted and requested a copy of Tidewater's depole survey to verify that all CP reads were sufficient. Based on depole survey, Tidewater meets 100 mV shift criteria for cathodic protection.  Discussed no findings and UTC process after the inspection.	Date:	August 31, 2020

For PHMSA Advisory Bulletins, go to <a href="https://www.phmsa.dot.gov/regulations-fr/notices">https://www.phmsa.dot.gov/regulations-fr/notices</a>