

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Procedures and Plan Review

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 **Standard Inspection Checklist, Cover Letter and Field Report** are to be submitted to the Senior Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/Docket #	6181		
Inspector Name & Submit Date	Dave Cullom 11/16/15		
Chief Engineer Name & Review Date	Joe Subsits 11/17/2015		
Operator Information			
Name of Operator:	Olympic Pipe Line - Intrastate Laterals	OPID #:	30781
Name of Unit(s):	Headquarters		
Records Location:	Renton, Wa		
Date(s) of Last (unit) Inspection:	2012 (O&M)	Inspection Date(s):	October 19&20, 2015

Inspection Summary:	This inspection consisted of a plan and procedure review. There were no areas of concern or probable violations.
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HQ Address:		System/Unit Name & Address:	
BP Pipelines (North America) Inc. US Pipelines & Logistics 150 W. Warrenville Road Naperville, IL 60563		Olympic Pipe Line - North, South & Intra Laterals: 600 SW, 39th Street, Suite 275, Renton, WA 98057	
Co. Official:	Donald W. Porter, President	Phone No.:	None in file
Phone No.:	630-596-2522	Fax No.:	None in file
Fax No.:	None in file	Emergency Phone No.:	888-271-8880 Renton Control Center
Emergency Phone No.:			
Persons Interviewed	Title	Phone No.	
Jim Bruen	DOT Team Leader	331-702-3367	
John Newhouse	DOT Compliance Advisor	847-714-7610	

CONVERSION TO SERVICE			S	U	N/A	N/C
1.	195.5(a-c)	Has a written procedure been developed addressing all applicable requirements and followed? ***Notes – In procedure P-195.5***	X			

REGULATED RURAL GATHERING LINES			S	U	N/A	N/C
2.	195.11	Operator has identified pipelines that are Regulated Rural Gathering Lines that meet all of the following criteria: (1) nominal diameter from 6 5/8 inches to 8 5/8 inches; (2) located in or within one-quarter mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
3.	195.11(b)	Operator has prepared written procedures to carry out the requirements of 195.11. <ul style="list-style-type: none"> • Subpart B Reporting • Corrosion Control • Damage Prevention • Public Awareness • Establish MAOP • Line Markers • Operator Qualification 			X	
4.	195.11(c)	If a new USA is identified after July 3, 2008, the operator must implement the requirements in paragraphs (b)(2 - 8), and (b)(11) for affected pipelines within 6 months of identification. For steel pipelines, comply with the deadlines in paragraphs (b)(9 & 10).			X	
5.	195.11(d)	Operator must maintain : (1) Segment identification records required in paragraph (b)(1) of this section and the records required to comply with (b)(10) of this section, for the life of the pipe. (2) records necessary to demonstrate compliance (b)(2 – 9 & 11) of this section according to the record retention requirements of the referenced section or subpart.			X	

Comments:

*****#2-5 Notes – No assets of this type in their system*****

LOW-STRESS PIPELINES IN RURAL AREAS			S	U	N/A	N/C
6.	195.12(a)	Operator has identified pipelines that are Regulated Low-stress Pipelines in Rural Areas that meet all of the following criteria: (except for those already covered by 49 CFR 195) (1) nominal diameter of 8 5/8 inches or more; (2) located in or within one-half mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
7.	195.12(b)	Operator has prepared written procedures to carry out the requirements of 195.12. <ul style="list-style-type: none"> Subpart B Reporting Establish Integrity Management Plan All Part 195 Safety Requirements 			X	
8.	195.12(c)(1)	Operator may notify PHMSA of economic burden.			X	
9.	195.12(d)	If, after July 3, 2008, a new USA is identified, the operator must implement the requirements in paragraphs (b)(2)(i) for affected pipelines within 12 months of identification.			X	
10.	195.12(d)	Operator must maintain: (1) Segment identification records required in paragraph (b)(1) for the life of the pipeline. (2) Records necessary to demonstrate compliance (b)(2 - 4) according to the record retention requirements of the referenced section or subpart.			X	

Comments:

*****#6-10 Notes – No assets of this type in their system. Still in OMER Book 1 under 195.12*****

SUBPART B - REPORTING PROCEDURES			S	U	N/A	N/C
11.	195.402(a) 195.402(c)(2)	Complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year for each commodity, and each state a pipeline traverses by June 15 of each calendar year. (NOTE: August 15, 2011 for the year 2010). (Amdt. 195-95, 75 FR 72877, November 26, 2010, eff. 1/1/2011). .49 ***Notes – In procedure P-195.5***	X			
12.		Accident report criteria, as detailed under 195.50. A release that results in, 5 gallons or more, death or personal injury necessitating hospitalization , an explosion or fire not intentionally set by the operator , or total estimated property damage including clean-up and product lost equaling \$50,000 or more. (Note: A release of less than 5 gals may still require reporting. See 195.50(b) and 195.52(a)(4) for additional requirements and exemptions for maintenance work under 5 BBLs). .50 ***Notes – In procedure P-195.50***	X			
13.		Immediate notice to NRC (800) 424-8802 , or electronically at http://www.nrc.uscg.mil , of certain events, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. (Amdt. 195-95, 75 FR 72878, November 26, 2010, eff. 1/1/2011). .52 ***Notes – In procedure P-195.52***	X			
14.		Accident Report - file as soon as practicable, but no later than 30 days after discovery. Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov (Amdt. 195-95, 75 FR 72878, November 26, 2010). .54(A) ***Notes – In procedure P-195.50***	X			
15.		Supplemental report - required within 30 days of information change/addition .54(b)	X			

SUBPART B - REPORTING PROCEDURES			S	U	N/A	N/C
		Notes – In procedure P-195.50				
16.		Safety-related conditions (SRC) - criteria .55 ***Notes – In procedure P-195.55***	X			
17.		SRC Report is required to be filed within five (5) working days of the determination and within ten (10) working days after discovery .56(a) ***Notes – In procedure P-195.55 II A4***	X			
18.		SCR Report requirements, including corrective actions (taken and planned) .56(b) ***Notes – In procedure P-195.5 – SRC Form 195.55***	X			
19.	195.402(a) 195.402(c)(2)	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline unless an alternative reporting method is authorized IAW with paragraph (d) of this section. (Amdt. 195-95, 75 FR 72878, Nov. 26, 2010, eff. 1/1/2011). ***Notes – In procedure P-195.50. They have been emailing them too. ***	X			
20.		Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline (Amdt. 195-95, 75 FR 72878, Nov.26, 2010, eff. 1/1/2011). .64(a-d) ***Notes – In procedure P-195.64***	X			
WAC 480-75 REPORTING PROCEDURES			S	U	N/A	N/C
21.	480-75-610	Reporting of proposed pipeline construction 45 days prior to construction ***Notes – In Section III – OMER Book 1 #1 ***	X			
22.	480-75-620	Providing notice of hydrotest to change MOP ***Notes – In Section III – OMER Book 1 #2 ***	X			
23.	480-75-630	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. ***Notes – In Section III – OMER Book 1 #3a ***	X			
24.	480-75-630(2)	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. ***Notes – In Section III – OMER Book 1 #3b ***	X			
25.	480-75-630(3)	Notification within 24 hours of emergency situations including emergency shutdowns, material defects or physical damage that impairs serviceability? ***Notes – In Section III – OMER Book 1 #3c ***	X			
26.	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)				
27.	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) ***Notes – In Section III – OMER Book 1 #3d ***	X			
28.	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 <u>without facility locates</u> first being completed?***Notes – In Section III – OMER Book 1 #3dii ***	X			
29.	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? ***Notes – In	X			

SUBPART B - REPORTING PROCEDURES			S	U	N/A	N/C
		Section III – OMER Book 1 #3diii *** Note: Records maintained for two years and made available to the commission upon request.				
30.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities?				
31.	480-75-630(5)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) ***Notes – In Section III – OMER Book 1 #3ei *** 	X			
32.	480-75-630(5)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and ***Notes – In Section III – OMER Book 1 #3eii *** 	X			
33.	480-75-630(5)(c)	<ul style="list-style-type: none"> 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.***Notes – In Section III – OMER Book 1 #3eiii *** 	X			
34.	480-75-630(6)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> 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) ***Notes – In Section III – OMER Book 1 #3fa and #3fb*** 	X			

Comments:

SUBPART C – INTERNAL DESIGN PRESSURE PROCEDURES			S	U	N/A	N/C
35.	195.402(c) 195.422	Internal design pressure for pipe in a pipeline is determined in accordance with the requirements of this section and the formula: $P = (2 St/D) \times E \times F$. .106 ***Notes – In Section III – USPL Calculating MODP***	X			

SUBPART C - PASSAGE OF INTERNAL INSPECTION DEVICE PROCEDURES			S	U	N/A	N/C
36.	195.402(c) 195.422	Each new pipeline or each section of a pipeline which pipe or components has been replaced must be designed and constructed to accommodate the passage of instrumented internal inspection devices that are applicable to this section .120(a) ***Notes – In procedure P-195.422 Section 3***	X			

Comments:

SUBPART D – WELDING, NDT, and REPAIR /REMOVAL PROCEDURES			S	U	N/A	N/C
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SUBPART D – WELDING, NDT, and REPAIR /REMOVAL PROCEDURES			S	U	N/A	N/C
Compliance with welding requirements for pipe replaced or repaired in the course of pipeline maintenance is required by §195.422 and §195.200.						
37.	195.402(c) 195.422	Welding must be performed by qualified welders using qualified welding procedures. .214(a) ***Notes – In procedure P-195.214 Section II***	X			
38.		Are welding procedures qualified in accordance with Sec. 5 of API 1104 or Section IX of ASME Boiler & Pressure Code? ***Notes – In procedure P-195.214***	X			
39.		Welding procedures must be qualified by destructive testing. ***Notes – In procedure P-195.214***	X			
40.		Each welding procedure must be recorded in detail including results of qualifying tests. .214(b) ***Notes – In procedure P-195.214***	X			
41.		Welders must be qualified in accordance with Section 6 of API Standard 1104 (20th edition 2007, including errata 2008) or Section IX of the ASME Boiler and Pressure Vessel Code (2007 edition, July 1, 2007) , except that a welder qualified under an earlier edition than currently listed in 195.3 may weld, but may not re-qualify under that earlier edition. (Amndt 195-94 Pub. 8/11/10 eff. 10/01/10). .222(a) ***Notes – In procedure P-195.214 Section III***	X			
42.		Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has--(1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 9 of API 1104. .222(b) ***Notes – In procedure P-195.214 Section III***	X			
43.	195.402(c) 195.422	Arc burns must be repaired. .226(a) ***Notes – The operator will either repair or relocate the pipe.***	X			
44.		Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? (Ammonium Persulfate). Pipe must be removed for non-repairable notches. .226(b) ***Notes – In procedure P-195.214 Section 5 F2***	X			
45.		The ground wire may not be welded to the pipe/fitting being welded. .226(c) ***Notes – In procedure USPL 6.1 B***	X			
Nondestructive Testing Procedures						
46.	195.402(c) 195.422	Do procedures require welds to be nondestructively tested to ensure their acceptability according to API 1104 and as per 195.228(b) and per the requirements of 195.234 in regard to the number of welds to be tested? ***Notes – In procedure P-195.234 I A***	X			
47.		Nondestructive testing of welds must be performed: .234(b)				
48.		1. In accordance with written procedures for NDT ***Notes – In procedure P-195.234 5A***	X			
49.		2. By qualified personnel ***Notes – In procedure P-195.234 IIIA***	X			
50.		3. By a process that will indicate any defects that may affect the integrity of the weld ***Notes – In procedure P-195.234 5A***	X			
51.		Records of the total number of girth welds and the number nondestructively tested, including the number rejected and the disposition of each rejected weld, must be maintained. .266 ***Notes – In procedure P-195.214 Section X Part C***	X			
Repair or Removal of Weld Defect Procedures						
52.	195.402(c) 195.422	Welds that are unacceptable must be removed and/or repaired. See .228 and .230 for exceptions. .230 ***Notes – In procedure P-195.214 Section 5***	X			

Comments:

SUBPART E - PRESSURE TESTING PROCEDURES			S	U	N/A	N/C
53.	195.402(c) 195.422 480-93-420	Pipelines, and each pipeline segment that has been relocated, replaced, or otherwise changed, must be pressure tested without leakage (see .302(b), (c), and .305(b) for exceptions). .302(a) ***Notes – Business unit group practice – P195.300***	X			
54.		Except for lines converted under §195.5 , the following pipelines may be operated				

SUBPART E - PRESSURE TESTING PROCEDURES			S	U	N/A	N/C
55.		without having been pressure tested per Subpart E and without having established MOP under 195.406(a)(5) [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure] .302(c)				
56.		- Intrastate liquid lines constructed before 10/21/85 (excluding HVL onshore or low stress lines). .302(b)(iii) - Carbon dioxide pipeline constructed before 07/12/91 that is located in a rural area as part of production field distribution system. .302(b)(2)(ii) - Any low-stress pipeline constructed before 8/11/1994, that does not transport HVL. .302(b)(3)				
57.		- Those portions of older hazardous liquid and carbon dioxide pipelines for which an operator has elected the risk-based alternative under §195.303 and which are not required to be tested based on the risk-based criteria. .302(b)(4)/.303 <i>Note: (An operator that elected to follow a risk-based alternative must have developed plans that included the method of testing and a schedule for the testing by December 7, 1998. The compliance deadlines for completion of testing are as shown in the table in §195.303, and in no case was testing to be completed later than 12/07/2004).</i>				
58.		Have pipelines <u>other than those described above</u> been pressure tested per Subpart E? ***Notes – Business unit group practice – P195.300***	X			
59.		If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under 195.406(a)(5) , in accordance with .302(c) ? <i>Note: Establishing MOP under 195.406(a)(5) only applies to specified “older” pipelines constructed prior to the dates in .302(b).</i> ***Notes – Business unit group practice – P195.300***			X	
60.		Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required. .304 ***Notes – P195.300 Section V B&C***	X			
61.		All pipe, all attached fittings, including components, must be pressure tested in accordance with §195.302. .305(a) ***Notes – P195.300 Section III***	X			
62.		A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory. .305(b) ***Notes – Business unit group practice – P195.300 Section III***	X			
63.		Appropriate test medium .306 ***Notes – P195.300 Section IV	X			
64.		Pipe associated with tie-ins must be pressure tested. .308 ***Notes – P195.300 Section IIIA	X			
65.		Test records must be retained for useful life of the facility. .310(a) ***Notes – P195.300 Section XII A&B	X			
		Does the record required by paragraph (a) of this section include: .310(b)				
66.		Pressure recording charts. .310(b)(1) ***Notes – P195.300 Section XII B1	X			
67.		Test instrument calibration data. .310(b)(2) ***Notes – P195.300 Section XII B2	X			
68.		Name of the operator, person responsible, test company used, if any. .310(b)(3) ***Notes – P195.300 Section XII B3	X			
69.		Date and time of the test. .310(b)(4) ***Notes – P195.300 Section XII B4	X			
70.		Minimum test pressure. .310(b)(5) ***Notes – P195.300 Section XII B5	X			
71.		Test medium. .310(b)(6) ***Notes – P195.300 Section XII B6	X			
72.		Description of the facility tested and the test apparatus. .310(b)(7) ***Notes – P195.300 Section XII B7	X			
73.		Explanation of any pressure discontinuities, including test failures, that appear on the pressure recording charts. .310(b)(8) ***Notes – P195.300 Section XII B8	X			

SUBPART E - PRESSURE TESTING PROCEDURES			S	U	N/A	N/C
74.		Where elevation differences in the test section exceed 100 feet , a profile of the elevation over entire length of the test section must be included. .310(b)(9) ***Notes – P195.300 Section XII B9	X			
75.		Temperature of the test medium or pipe during the test period. Amdt 195-78 pub. 9/11/03, eff. 10/14/03. .310(b)(10) ***Notes – P195.300 Section XII B10	X			
76.		Signature of certifying agent. WAC 480-75-420 (4)(b) ***Notes – P195.300 Section III B3	X			
77.		Beginning and ending times of the test. WAC 480-75-420 (4)(c) ***Notes – P195.300 Section XI	X			
78.		Highest and lowest pressure achieved. WAC 480-75-420 (4)(e) ***Notes – P195.300 Section X	X			
79.		Is report submitted to the commission 45 days prior to a hydro test, if test was used to raise the MOP (after 9/26/02)? WAC 480-75-620 ***Notes – P195.300 Section VII B1&5	X			

Comments:

SUBPART F - OPERATIONS & MAINTENANCE PROCEDURES			S	U	N/A	N/C
80.	195.402(a)	a. Has the operator prepared a manual for normal operations & maintenance activities & handling abnormal operations & emergencies? .402	X			
81.		b. Procedures for reviewing the manual at intervals not exceeding 15 months, but at least each calendar year? ***Notes – P195.402(a)	X			
82.		c. Appropriate parts must be kept at locations where O&M activities are conducted. ***Notes – P195.402(a) A4	X			

Comments:

SUBPART F - MAINTENANCE & NORMAL OPERATION PROCEDURES			S	U	N/A	N/C
		Written procedures must be followed to provide safety during maintenance and normal operations. Does the operator have procedures for: .402(c)				
83.	195.402(a)	Determining which pipeline facilities are located in areas that would require an immediate response by the operator to prevent hazards to the public if the facilities failed or malfunctioned? .402(c)(4) ***Notes – In procedure P195.452 Section III and 7***	X			
84.		Analyzing pipeline accidents to determine their causes? .402 (c)(5) ***Notes – P195.402(c)(5)	X			
85.		Minimizing the potential for hazards identified under paragraph (c)(4) and minimizing the possibility of recurrence of accidents analyzed under paragraph (c)(5)? .402(c)(6) ***Notes – P195.402(c)(5)	X			
86.		Starting up and shutting down any part of the pipeline system in a manner designed to assure operation within limits prescribed by §195.406 , considering the hazardous liquid or carbon dioxide in transportation, variations in the altitude along the pipeline, and pressure monitoring and control devices? .402(c)(7) ***Notes – P195.402 Section C 7	X			
87.		A pipeline that is not equipped to fail safe monitoring from an attended location pipeline pressure during startup until steady state pressure and flow conditions are reached and during shut-in to assure operation within limits prescribed by §195.406? .402(c)(8) ***Notes – P195.402 Section C 9	X			

SUBPART F - MAINTENANCE & NORMAL OPERATION PROCEDURES			S	U	N/A	N/C
88.		Facilities not equipped to fail safe that are identified under §195.402(c)(4) or that control receipt and delivery of hazardous liquid, detecting abnormal operating conditions by monitoring pressure, temperature, flow or other appropriate operational data and transmitting this data to an attended location? .402(c)(9) ***Notes – P195.402 Section C 9	X			
89.		Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards .402(c)(10) ***Notes – P195.402 C 10 Section IV	X			
90.		Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per 195.59. ***Notes – P195.402 C 10 Section IV	X			
91.		Minimizing the likelihood of accidental ignition of vapors in areas near facilities identified under paragraph (c)(4) of this section where the potential exists for the presence of flammable liquids or gases? .402(c)(11) ***Notes – P195.405 Section A 1	X			
92.		Establishing and maintaining liaison with fire, police, and other appropriate public officials to learn the responsibility and resources of each hazardous liquid pipeline emergency. .402(c)(12) ***Notes – P195.402 E	X			
93.		Periodically reviewing the work done by operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found? .402(c)(13) ***Notes – P195.402 C 13	X			
94.		Taking adequate precautions in excavated trenches to protect personnel from hazards of unsafe accumulations of vapor or gas, making available when needed at the excavation site, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line. .402(c)(14) ***Notes – P195.402 C 14	X			

Comments:

MAINTENANCE & NORMAL OPERATION PROCEDURES CONT:			S	U	N/A	N/C
95.	.402(c)(15)	Implementing the applicable control room management procedures required by 195.446. (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). .402(c)(15) ***Notes – In procedure P195.446	X			
96.	480-75-300	Providing leak detection under flow and no flow conditions and including a procedure for responding to alarm ***Notes – In OMER II 5.75.01 24” crude***	X			
97.	480-75-330	Responding to breakout tank overflow alarms ***Notes - Abnormal operations Section 2 F2***	X			
98.	480-75-400	Backfilling pipe ***Notes – In procedure P195.252	X			
99.	480-75-410	Using a holiday detector to check coating condition prior to backfilling ***Notes – In procedure P195.551 Section 4 C	X			
100.	480-75-460	100% Inspection of welds.	X			
101.	480-75-550	Reviewing change in class location for pipelines installed after 9/26/2003. ***Notes – No installations after 2003***			X	

ABNORMAL OPERATION PROCEDURES (CONTROL CENTER FUNCTION)			S	U	N/A	N/C
102.	195.402(a)	The O&M manual must contain written procedures to provide safety when operating design limits have been exceeded. Does the operator have procedures for: .402(d)	X			
		Responding to, investigating, and correcting the cause of: .402(d)(1)				
		i. Unintended closure of valves or shutdowns? ***Notes –Abnormal operations procedure P195.402d Section II A	X			

ABNORMAL OPERATION PROCEDURES (CONTROL CENTER FUNCTION)			S	U	N/A	N/C
103.		ii. An increase or decrease in pressure or flow rate outside normal operating limits? ***Notes –Abnormal operations procedure P195.402d Section II E 1	X			
104.		iii. Loss of communications? ***Notes –Abnormal operations procedure P195.402d Section II C	X			
105.		iv. The operation of any safety device?***Notes –Abnormal operations procedure P195.402d Section II F	X			
106.		v. Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property? ***Notes –Abnormal operations procedure P195.402d Section III and IV	X			
107.		Checking variations from normal operation after abnormal operations have ended at sufficient critical locations in the system to determine continued integrity and safe operations? .402(d)(2) ***Notes –Abnormal operations procedure P195.402d Section V A 2	X			
108.		Correcting variations from normal operation of pressure and flow equipment controls? .402(d)(3) ***Notes –Abnormal operations procedure P195.402d Section V A 3	X			
109.		Does operating personnel notify responsible operator personnel where notice of an abnormal operation is received? .402(d)(4) ***Notes –Abnormal operations procedure P195.402d SectionII A 2 iii	X			
110.		Periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found? .402(d)(5) ***Notes –Abnormal operations procedure P195.402d Section VI	X			

Comments:

EMERGENCY PROCEDURES			S	U	N/A	N/C
		The O&M manual must include written procedures to provide safety when an emergency condition occurs. Does the operator have procedures for: .402(e)				
111.		Receiving, identifying, and classifying notices of events which need immediate response by the operator or fire, police, or other, and notifying appropriate operator's personnel for corrective action? .402(e)(1) Note: Including third-party damage ***Notes –Abnormal operations procedure P195.402e	X			
112.	195.402(a)	Making a prompt and effective response to a notice of each type of emergency, fire, explosion, accidental release of hazardous liquid, operational failure, natural disaster affecting the pipeline? .402(e)(2) Note: Including third party damage ***Notes –Abnormal operations procedure P195.402e	X			
113.		Making personnel, equipment, instruments, tools, and materials available at the scene of an emergency? .402(e)(3) ***Notes –Abnormal operations procedure P195.402e	X			
114.		Taking action; such as emergency shutdown or pressure reduction, to minimize release of liquid at a failure site? .402(e)(4) ***Notes –Abnormal operations procedure P195.402e Section 4 i	X			
115.	195.402(a)	Controlling the release of liquid at the failure site? .402(e)(5)***Notes –Abnormal operations procedure P195.402e Section 4	X			
116.		Minimizing the public .402(e)(6)exposure and accidental ignition, evacuation, and halting traffic on roads, railroads, etc.? ***Notes –Abnormal operations procedure P195.402e Section 3	X			
117.		Notifying fire, police, and others of hazardous liquid emergencies and preplanned responses including HVLs? .402(e)(7) ***Notes –Abnormal operations procedure P195.402e Section 1	X			

EMERGENCY PROCEDURES			S	U	N/A	N/C
118.		Determining extent and coverage of vapor cloud and hazardous areas of HVLs by using appropriate instruments? .402(e)(8) ***Notes –HSSE Policy Air Monitoring 6.2	X			
119.		Post-accident review of employee’s activities to determine if procedures were effective and corrective action was taken? .402(e)(9)***Notes –HSSE Policy Air Monitoring Section VII A	X			
120.		Actions to be taken by a controller during an emergency in accordance with 195.446 . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). .402(e)(10) ***Notes – In procedure P-195.446 Section II C	X			

Comments:

EMERGENCY RESPONSE TRAINING PROCEDURES (CONTROL CENTER & FIELD)			S	U	N/A	N/C	
		Each operator shall establish and conduct a written continuing training program to instruct operating and maintenance personnel to: .403(a)					
121.	195.402(a)	Carry out the emergency response procedures established under §195.402. .403(a)(1) ***Notes – In procedure P-195.403 Section II***	X				
122.		Know the characteristics and hazards of liquids or carbon dioxide transported, including in the case of HVL, flammability, of mixtures with air, odorless vapors, and water reactions. .403(a)(2) ***Notes – In procedure P-195.403 Section II***	X				
123.		Recognize conditions that are likely to cause emergencies; predict the consequences of malfunction or failures and take appropriate actions. .403(a)(3) ***Notes – In procedure P-195.403 Section II***	X				
124.		Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage. .403(a)(4) ***Notes – In procedure P-195.403 Section II***	X				
125.		Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition. .403(a)(5) ***Notes – In procedure P-195.403 Section III***	X				
126.		Instructions to enable O&M personnel to recognize and report potential safety related conditions. .402(f) ***Notes – In procedure P-195.403 Section IA and II A***	X				
			At intervals not exceeding 15 months, but at least once each calendar year: .403(b)				
127.			Review with personnel their performance in meeting the objectives of the emergency response training program .403(b)(1) ***Notes – In procedure P-195.403 Section IA ***	X			
128.			Make appropriate changes to the emergency response training program .403(b)(2) ***Notes – In procedure P-195.403 Section IA ***	X			
129.			Require and verify that supervisors maintain a thorough knowledge of the emergency response procedures for which they are responsible. .403(c) ***Notes – In procedure P-195.403 Section IA ***	X			

Comments:

MAPS and RECORDS PROCEDURES			S	U	N/A	N/C
130.	195.402(a) & WAC 480-75-600	Making construction records, maps, and operating history available as necessary for safe operation and maintenance. .402(c)(1) ***Notes – In procedure P-195.404 Section B 1 i **	X			
		Each operator shall maintain current maps and records of its pipeline system that include at least the following information: .404(a) Updated within 6 months 480-75-600				

MAPS and RECORDS PROCEDURES		S	U	N/A	N/C
	Location and identification of the following facilities: .404(a)(1)				
131.	i. Breakout tanks ***Notes – In procedure P-195.404 Section B1 i a**	X			
132.	ii. Pump stations***Notes – In procedure P-195.404 Section B1 i b**	X			
133.	iii. Scraper and sphere facilities***Notes – In procedure P-195.404 Section B1 i c**	X			
134.	iv. Pipeline valves***Notes – In procedure P-195.404 Section B1 i d**	X			
135.	v. Facilities to which §195.402(c)(9) applies***Notes – In procedure P-195.404 Section B1 i e**	X			
136.	vi. Rights-of-way***Notes – In procedure P-195.404 Section B1 i f**	X			
137.	vii. Safety devices to which §195.428 applies ***Notes – In procedure P-195.404 Section B1 i g**	X			
138.	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines. .404(a)(2) ***Notes – In procedure P-195.404 Section B1 i h**	X			
139.	The maximum operating pressure of each pipeline. .404(a)(3)***Notes – In procedure P-195.404 Section B1 i j**	X			
140.	The diameter, grade, type, and nominal wall thickness of all pipe. .404(a)(4) ***Notes – In procedure P-195.404 Section B1 i i**	X			
	Each operator shall maintain for at least 3 years daily operating records for the following: .404(b)				
141.	The discharge pressure at each pump station. .404(b)(1) ***Notes – In procedure P-195.404 Section B 2iii	X			
142.	Any emergency or abnormal operation to which the procedures under §195.402 apply. .404(b)(2) ***Notes – In procedure P-195.404 Section B 2iv	X			
	Each operator shall maintain the following records for the periods specified: .404(c)				
143.	The date, location, and description of each repair made on the pipe and maintain it for the life of the pipe . .404(c)(1) ***Notes – In procedure P-195.404 Section B 2i	X			
144.	The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least 1 year . .404(c)(2) ***Notes – In procedure P-195.404 Section B 2ii	X			
145.	Each inspection and test required by Subpart F shall be maintained for at least 2 years , or until the next inspection or test is performed, whichever is longer. .404(c)(3) ***Notes – In procedure P-195.404 Section B 2v	X			

Comments:

MAXIMUM OPERATING PRESSURE PROCEDURES (MOP) - ALL SYSTEMS		S	U	N/A	N/C
	Except for surge pressures and other variations from normal operations, the MOP may not exceed any of the following: .406(a)				
146.	The internal design pressure of the pipe determined by §195.106. Amt. 195-86 Pub. 06/09/06 eff. 07/10/06 .406(a)(1) ***Notes – In procedure P-195.406 i	X			
147.	The design pressure of any other component on the pipeline. .406(a)(2) ***Notes – In procedure P-195.406 ii	X			
148.	80% of the test pressure (Subpart E). .406(a)(3)***Notes – In procedure P-195.406 ii	X			
149.	80% of the factory test pressure or of the prototype test pressure for any individual component. .406(a)(4)***Notes – In procedure P-195.406 ii	X			
150.	80% of the test pressure or the highest operating pressure for a minimum of 4 hours for a pipeline that has not been tested under Subpart E . .406(a)(5)***Notes – In procedure P-195.406 ii	X			
151.	The pipeline may not be operated at a pressure that exceeds 110% of the MOP during surges or other variations from normal operations: .406(b) ***Notes – In procedure P-195.406 iv	X			

MAXIMUM OPERATING PRESSURE PROCEDURES (MOP) - ALL SYSTEMS			S	U	N/A	N/C
152.		Adequate controls and protective equipment must be installed to prevent the pressure from exceeding 110% of the MOP. ***Notes – In procedure P-195.406 iv	X			

Comments:

COMMUNICATION PROCEDURES (CONTROL CENTER)			S	U	N/A	N/C
153.	.402(a)	Operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline system. .408(a) ***Notes – In procedure P-195.408 II	X			
		Does the communication system required by paragraph (a) include means for: .408(b)				
154.		Monitoring operational data as required by §195.402(c)(9). .408(b)(1) ***Notes – In procedure P-195.408 III	X			
155.		Receiving notices from operator personnel, the public, and others about abnormal or emergency conditions and initiating corrective actions. .408(b)(2) ***Notes – In procedure P-195.408 I	X			
156.		Conducting two-way vocal communication between a control center and the scene of abnormal operations and emergencies. .408(b)(3) ***Notes – In procedure P-195.408 II	X			
157.		Providing communication with fire, police, and other appropriate public officials during emergency conditions, including a natural disaster. .408(b)(4) ***Notes – In procedure P-195.408 II	X			

Comments:

LINE MARKER PROCEDURES			S	U	N/A	N/C
158.	480-75-540	Markers checked annually and replaced within 30 days ***Notes – In procedure P-195.412 ROW Sec VII B	X			
159.	195.402(a)	Line markers must be placed over each buried pipeline in accordance with the following: .410(a) ***Notes – In procedure Section 9 STP 43-119 Specs for Auxiliary Installations	X			
160.		Located at each public road crossing, railroad crossing, and sufficient number along the remainder of each buried line so that its location is accurately known .410(a)(1) ***Notes – In procedure P-195.412 Section 9	X			
161.		Must have the correct characteristics and information .410(a)(2) ***Notes – In procedure P-195.412 Section 9 Figures B4&5	X			
162.		Must be placed where pipelines are aboveground in areas that are accessible to the public .410(c)	X			

Comments:

INSPECTION RIGHTS-of -WAY & CROSSINGS UNDER NAVIGABLE WATER PROCEDURES			S	U	N/A	N/C
163.	480-75-540	Depth of Cover - For pipelines constructed after 4/1/70, depth of cover surveys every five years or every three years for areas subject to erosion or subsoiling ***Notes – In procedure P-195.412 Section A	X			
164.	195.402(a)	Operator must inspect the right-of-way weekly (unless weather impedes flyovers when applicable) WAC 480-75-530 ***Notes – In procedure P-195.412 Section A	X			
165.		Operator must inspect each crossing under a navigable waterway to determine the crossing condition at intervals not exceeding 5 years. .412(b) ***Notes – In procedure P-195.412 Section B	X			

Comments:

UNDERWATER INSPECTION PROCEDURES of OFFSHORE PIPELINES			S	U	N/A	N/C
		When the operator discovers that a pipeline it operates is exposed on the seabed or constitutes a hazard to navigation, does the operator: .413(c)				
166.	195.402(a)	Promptly, but no later than 24 hours after discovery, notify the NRC by phone. .413(c)(1)			X	
167.		Promptly, but not later than 7 days after discovery, mark the location of the pipeline in accordance with 33 CFR Part 64 at each end of the pipeline segment and at intervals of not over 500 yards long, except that a pipeline segment less than 200 yards long need only be marked at the center. .413(c)(2)			X	
168.		Within 6 months after discovery, or not later than November 1 of the following year if the 6 month period is after November 1 of that year the discovery is made, place the pipeline so that the top of the pipe is 36 inches below the seabed for normal excavation or 18 inches for rock excavation. .413(c)(3)			X	
169.		Offshore pipeline condition reports - must be filed within 60 days after the inspections .57			X	

Comments:
 #166-169 Notes – No offshore lines in this unit.

VALVE MAINTENANCE PROCEDURES			S	U	N/A	N/C
170.	195.402(a)	Operator must maintain each valve that is necessary for the safe operation of its pipeline system in good working order at all times. .420(a) ***Notes – In procedure P-195.420 Section II	X			
171.		Operator must inspect each mainline valve to determine that it is functioning properly at intervals not exceeding 7½ months, but at least twice each calendar year. .420(b) ***Notes – In procedure P-195.420	X			
172.		Operator must provide protection for each valve from unauthorized operation and from vandalism. .420(c) ***Notes – In procedure P-195.420 Section I	X			

Comments:

PIPELINE REPAIR PROCEDURES			S	U	N/A	N/C
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PIPELINE REPAIR PROCEDURES			S	U	N/A	N/C
173.	WAC 480-75-440	Repairs made in accordance with ASME B31.4 ***Notes – In procedure P-195.420 Section I A	X			
174.	195.402(a)	Operator must, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons and property. .422(a) ***Notes – In procedure P-195.422 Section I A	X			
175.		No operator may use any pipe, valve, or fitting, for replacement in repairing pipeline facilities, unless it is designed and constructed as required by this part. .422(b)***Notes – In procedure P-195.422 Section B 1, 2, 3, 4	X			

Comments:

PIPE MOVEMENT PROCEDURES			S	U	N/A	N/C
176.	480-75-500	For evaluating pipe conditions during pipe movement including API 1117 stress calculations? ***Notes – In procedure P-195.422 Section IX A	X			
177.	195.402(a)	When moving any pipeline, the operator must reduce the pressure for the line segment involved to 50% of the MOP. .424(a) ***Notes – In procedure P-195.422 Section IX B	X			
		For HVL lines joined by welding, the operator must: .424(b)				
178.		Move the line when it does not contain HVL, unless impractical. .424(b)(1) ***Notes – In procedure P-195.422 Section IX C 1	X			
179.		Have procedures under §195.402 containing precautions to protect the public. .424(b)(2) ***Notes – In procedure P-195.422 Section IX C 2	X			
180.		Reduce the pressure for the line segment involved to the lower of 50% of the MOP or the lowest practical level that will maintain the HVL in a liquid state. (Minimum = V.P. + 50 psig) .424(b)(3) ***Notes – In procedure P-195.422 Section IX C 3	X			
		For HVL lines not joined by welding, the operator must: .424(c)				
181.		Move the line when it does not contain HVL, unless impractical. .424(c)(1)			X	
182.		Have procedures under §195.402 containing precautions to protect the public. .424(c)(2)			X	
183.	Isolate the line to prevent flow of the HVL. .424(c)(3)			X		

Comments:
181 -183 ***Notes - The lines are joined by welding***

SCRAPER and SPHERE FACILITY PROCEDURES			S	U	N/A	N/C
184.	195.402(a)	Operator must have a relief device capable of safely relieving the pressure in the barrel before insertion or removal of scrapers or spheres. .426 ***Notes – In procedure P-195.426 Section 5 fig 1***	X			
185.		Operator must have a suitable device to indicate that pressure has been relieved, or a means to prevent insertion. ***Notes – In procedure P-195.426 Section 5 fig 1***	X			

Comments:

OVERPRESSURE SAFETY DEVICE PROCEDURES			S	U	N/A	N/C
186.	195.402(a)	Operator must inspect and test each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment to determine that it is functioning properly, in good mechanical condition, has adequate capacity, and is reliable. .428(a) ***Notes – In procedure P-195.428 e***	X			
187.		Operator must inspect and test overpressure safety devices at the following intervals:				
188.		1. Non-HVL pipelines at intervals not to exceed 15 months , but at least once each calendar year. ***Notes – In procedure P-195.428 1A***	X			
189.		2. HVL pipelines at intervals not to exceed 7-1/2 months , but at least twice each calendar year. ***Notes – In procedure P-195.428 1A***	X			
190.		Operator must inspect and test relief valves on HVL breakout tanks at intervals not exceeding 5 years . .428(b) ***Notes – No HVL tanks in Wa State***			X	
191.		Aboveground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to section 5.1.2 of API Standard 2510.				
		Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 unless operator noted in procedures manual (§195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank. .428(c) ***Notes – No bullet tanks in Wa State***			X	
		After October 2, 2000, the requirements of paragraphs (a) and (b) of this section for inspection and testing of pressure control equipment apply to the inspection and testing of overfill protection systems. .428(d)***Notes – No HVL tanks in Wa State – only line pipe***			X	

Comments:

FIREFIGHTING EQUIPMENT PROCEDURES			S	U	N/A	N/C
192.	195.402(a)	Operator must maintain adequate firefighting equipment at each pump station and breakout tank areas. .430 (a-c) ***Notes – In procedure P-195.430***	X			
		The equipment must be:				
193.		a. In proper operating condition at all times. ***Notes – In procedure P-195.430 Section I A 1***	X			
194.		b. Plainly marked so that its identity as firefighting equipment is clear. ***Notes – In procedure P-195.430 Section I A 2***	X			
195.		c. Located so that it is easily accessible during a fire. ***Notes – In procedure P-195.430 Section I A 3***	X			

Comments:

BREAKOUT TANK PROCEDURES		
196.	195.402(a)	Utilize PHMSA Form #10 for all Breakout Tank Procedures

SIGN PROCEDURES			S	U	N/A	N/C
197.	.434	Operator must maintain signs visible to the public around each pumping station and breakout tank area. ***Notes – In procedure P-195.436 Section II***	X			

SIGN PROCEDURES				S	U	N/A	N/C
198.	.402(a)		Signs must contain the name of the operator and a telephone number (including area code) where the operator can be reached at all times. Amdt 195-78 pub. 9/11/03, eff. 10/14/03.***Notes – In procedure P-195.436 Section II***	X			

Comments:

SECURITY of FACILITY PROCEDURES				S	U	N/A	N/C
199.	195.402(a)		Operator must provide protection for each pumping station and breakout tank area and other exposed facilities from vandalism and unauthorized entry. .436***Notes – In procedure P-195.436 Section I A***	X			

Comments:

SMOKING OR OPEN FLAME PROCEDURES				S	U	N/A	N/C
200.	195.402(a)		Operator must prohibit smoking and open flames in each pump station and breakout tank area where there is the possibility of the presence of hazardous liquids or flammable vapors. .438 ***Notes – In procedure P-195.436 Section I B***	X			

Comments:

PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)				S	U	N/A	N/C
1.	192.402(a)		Public Awareness Program in accordance with API RP 1162, (1 st edition Dec-2003) .440				
2.			The operators program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .440(d)				
3.			(1) Use of a one-call notification system prior to excavation and other ***Notes – In procedure P-195.440 Section VI A1***	X			
4.			(2) Possible hazards associated with unintended releases from a hazardous liquids or carbon dioxide pipeline facility;***Notes – In procedure P-195.440 Section VI A2***	X			
5.			(3) Physical indications of a possible release;***Notes – In procedure P-195.440 Section VI A3***	X			
6.			(4) Steps to be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; ***Notes – In procedure P-195.440 Section VI A4***	X			
7.			(5) Procedures to report such an event (to the operator). ***Notes – In procedure P-195.440 Section VI A5***	X			
8.			Does program include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations. .440(e)***Notes – In procedure P-195.440 Section VII A1***	X			
9.			The operator’s program and the media used must be comprehensive enough to reach all areas the operator transports gas. .440(f) ***Notes – In procedure P-195.440 Section VII B	X			

		F***				
10.		Is the program conducted in English and any other languages commonly understood by a significant number of the population? .440(g) ***Notes – In procedure P-195.440 Section 9 A & B***	X			
11.		IAW API RP 1162, the operator’s program should be reviewed for effectiveness within four years of the date the operator’s program was first completed. <u>For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010.</u> .440(i) ***Notes – In BP NA Inc PA program document. Section 11 effectiveness evaluation***	X			

Comments:

DAMAGE PREVENTION PROGRAM PROCEDURES (Also in accordance with API 1162)			S	U	N/A	N/C
201.	.402(a)	.442(a) Is there a written program in place to prevent damage by excavation activities applicable to the operator's pipelines? ***Notes – In procedure P-195.442***	X			
202.		.442(b) Does the operator participate in a qualified One-Call program? ***Notes – In procedure P-195.442 Section III***	X			
203.		.442(c)(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located. ***Notes – In procedure P-195.442 Section IV***	X			
		.442(c)(2) Provide for notification to the public in the vicinity of the pipeline and actual notification to the persons identified in paragraph (c)(1) of this section of the following, as often as needed to make them aware of the damage prevention program:				
204.		i. The program's existence and purpose. ***Notes – In procedure P-195.442 Section I***	X			
205.		ii. How to learn the location of underground pipelines before excavation activities are begun. ***Notes – In procedure P-195.442 Section V***	X			
206.		.442(c)(3) Provide a means of receiving and recording notification of planned excavation activities. ***Notes – In procedure P-195.442 Section VI***	X			
207.		.442(c)(4) If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings. ***Notes – In procedure P-195.442 Section VII***	X			
208.		.442(c)(5) Provide for marking of buried pipelines in the area of excavation activity within 2 business days. WAC 480-75-270 RCW 19.122.030***Notes – In procedure P-195.442 Section VII D & Exhibit A***	X			
		.442(c)(6) Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
209.		i. The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline. ***Notes – In procedure P-195.442 Section IX***	X			
210.		ii. In the case of blasting, any inspection must include leakage surveys. ***Notes – In procedure P-195.442 Section X***	X			
211.		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? ***Notes – In procedure P-195.442 Section VII They are on site if there are operations within 35ft of their facilities.***	X			
	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? ***Notes – In procedure P-195.402***	X				
212.	Damage Prevention (Operator Internal Performance Measures) PHMSA – State Program Evaluation Questions					
213.	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) ***Notes – QA checks (J Fraley) performs. Tulsa control also audits to make sure the 2 day requirement is met.***	X				

DAMAGE PREVENTION PROGRAM PROCEDURES (Also in accordance with API 1162)				S	U	N/A	N/C
214.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? ***Notes – The contractor is not used again if there are performance issues***	X				
215.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?***Notes – The contractor is not used again if there are performance issues***	X				
216.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?***Notes – These are prereqs in the damage prevention program***	X				
217.		Review operator locating and excavation procedures for compliance with state law and regulations. ***Notes – In procedure P-195.442 Section VII D Exhibit A***	X				
218.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ***Notes – This is performed during a standard audit. The scope of this audit was a plan an procedure review***	X				
219.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X				

DAMAGE PREVENTION PROGAM PROCEDURES (State Requirements)				S	U	N/A	N/C
220.		Terminating the flow of hazardous liquid in pipeline immediately upon receiving information of <u>third party damage</u> . RCW 19.122.035 (2) ***Notes – In procedure P-195.402e Section II A last 2 paragraphs***	X				
221.		Has the pipeline company visually inspected the damaged pipeline RCW 19.122.035 (2)***Notes – In procedure P-195.402e Section II A last 2 paragraphs***	X				
222.		Has the pipeline company determined if the damaged pipeline should be repaired or replaced ***Notes – In procedure P-195.402e Section II A last 2 paragraphs*** RCW 19.122.035 (2)	X				
223.		Notification to local first responders and Dept of Ecology of any reportable release?***Notes – This is in the GRPs for each unit Section 3 in the response plan Fig 3.2 Northwest pipelines district.***	X				

Comments:

CPM/LEAK DETECTION PROCEDURES				S	U	N/A	N/C
224.	.402(a)	Each new computational pipeline monitoring (CPM) leak detection system and each replaced component of an existing CPM system must comply with section 4.2 of API 1130, (3rd Edition, September 2007) in its design and with any other design criteria addressed in API 1130 for components of the CPM leak detection system. (Amdt 195-94 Pub. 75 FR 48593 8/11/10 eff. 10/01/10). .134 ***Notes – In procedure P-195.444 API 1130***	X				
225.		If a CPM system is installed, operator's procedures for the CPM leak detection system shall comply with API 1130, (3rd Edition, September 2007) in operating, maintaining, testing, record keeping, and dispatching training. (Amdt 195-94, 75 FR 48593 Pub. 8/11/10 eff. 10/01/10). .444; .446(b)(c)***Notes – In procedure P-195.444 API 1130***	X				

Comments:

CONTROL ROOM MANAGEMENT PROCEDURES (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010)				S	U	N/A	N/C
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CONTROL ROOM MANAGEMENT PROCEDURES (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010)			S	U	N/A	N/C
.402(a)	.446	This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system.				
	.446(a)	Operator must develop written procedures no later than August 1, 2011, and implement the procedures no later than February 1, 2013. Amdt. 195-93 Pub. 12/03/09 eff. 02/01/10, ***Notes – completed***	X			
	.446(b)	Operator must define roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions including: (1) When making decisions and taking actions during normal operations; (2) When an abnormal operating condition is detected; (3) During an emergency; (4) A method of recording controller shift-changes and any hand-over of responsibility between controllers. ***Notes – In procedure P-195.446 Section II D***	X			
	.446(c)(1)	Operator must implement API RP 1165, (1st Edition, January 2007) (incorporated by reference, <i>see</i> § 195.3) whenever a SCADA system is added, expanded or replaced, unless the operator demonstrates that certain provisions of API RP 1165 are not practical for the SCADA system used. ***Notes – In procedure P-195.446 Section II D***	X			
	.446(c)(2)	Operator must conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays.***Notes – In procedure P-195.446 Section II D***	X			
	.446(c)(3)	Operator must test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, once each calendar year, NTE 15 months.***Notes – In procedure P-195.446 Section II D***	X			
	.446(c)(4)	Operator must test any backup SCADA systems once each calendar year, NTE 15 months.***Notes – In procedure P-195.446 Section II D***	X			
	.446(c)(5)	Operator must implement section 5 of API RP 1168, (1st Edition, September 2008) (incorporated by reference, <i>see</i> § 195.3) to establish procedures for when a different controller assumes responsibility, including the content of information to be exchanged.***Notes – In procedure P-195.446 Section II C***	X			
	.446(d)	Operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller’s ability to carry out the defined roles and responsibilities: (1) Establish shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep; (2) Educate controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue; (3) Train controllers and supervisors to recognize the effects of fatigue; and (4) Establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility. ***Notes – In procedure P-195.446 Section II E***	X			
	.446 (e)	If a SCADA system is used, operator must have a written Alarm Management Plan including the following provisions to:				

CONTROL ROOM MANAGEMENT PROCEDURES (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010)			S	U	N/A	N/C
		(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations; (2) Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities; (3) Verify the correct safety-related alarm set-point values and alarm descriptions when associated field instruments are calibrated or changed and once each calendar year, NTE 15 months; (4) Review the alarm management plan required by this paragraph once each calendar year, NTE 15 months, to determine the effectiveness of the plan; (5) Monitor the content and volume of general activity being directed to and required of each controller once each calendar year, NTE 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms; and (6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section. ***Notes – In procedure P-195.446 Section III***	X			
.446 (f)	Assure changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:					
	(1) Implement section 7 of API RP 1168 for control room management change and require coordination between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration; and (2) Require field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations. ***Notes – In procedure P-195.446 Section IV ***		X			
.446 (g)	Assure lessons learned from operating experience are incorporated, as appropriate, into control room management procedures by performing each of the following:					
	(1) Review accidents that must be reported pursuant to § 195.50 and 195.52 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to: (i) Controller fatigue; (ii) Field equipment; (iii) The operation of any relief device; (iv) Procedures; (v) SCADA system configuration; and (vi) SCADA system performance. (2) Include lessons learned from the operator's experience in the training program required by this section. ***Notes – In procedure P-195.446 Section VI***		X			
.446 (h)	Operator must establish a controller training program to provide for training each controller to carry out the roles and responsibilities defined by the operator and review the training program content to identify potential improvements once each calendar year, NTE 15 months. ***Notes – In procedure P-195.446 Section VI***		X			
.446(h)	An operator's controller training program must include the following elements:					
	(1) Responding to abnormal operating conditions likely to occur simultaneously or in sequence; (2) Use of a computerized simulator or non-computerized (tabletop) method for training controllers to recognize abnormal operating conditions; (3) Training controllers on their responsibilities for communication under the operator's emergency response procedures; (4) Training that will provide a controller a working knowledge of the pipeline system, especially during the development of abnormal operating conditions; and (5) For pipeline operating setups that are periodically, but infrequently used, providing an opportunity for controllers to review relevant procedures in advance of their application. ***Notes – In procedure P-195.446 Section VII***		X			

Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002	S	U	N/A	N/C
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Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002			S	U	N/A	N/C
49 U.S.C. 60132, Subsection (b) ADB-08-07	Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to https://www.npms.phmsa.dot.gov/DataReview/login.jsp to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates. ***Notes – In procedure P-195.49 (AnnRpt)***		X			
RCW 81.88.080	Pipeline Mapping System: Operator provides 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? ***Notes – They have provided this information to the Commission when we have requested it.***		X			

PIPELINE INTEGRITY MANAGEMENT IN HIGH CONSEQUENCE AREAS PROCEDURES			S	U	N/A	N/C
.452	This form does not cover Liquid Pipeline Integrity Management Programs					

SUBPART G - OPERATOR QUALIFICATION PROCEDURES			S	U	N/A	N/C
.501 -.509	Refer to Operator Qualification Inspection Forms and Protocols (OPS web page)					

SUBPART H - CORROSION CONTROL PROCEDURES 195.402(a)			S	U	N/A	N/C
226.	Do procedures require that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures for which they are responsible for insuring compliance? .555 ***Notes – In procedure P-195.551 Corrosion Control***		X			
	Except bottoms of aboveground breakout tanks, each buried or submerged pipeline must have an external coating for external corrosion control if the pipeline is : .557					
227.	a) Constructed, relocated, replaced, or otherwise changed after the applicable dates : 3/31/70 - interstate pipelines excluding low stress 7/31/77 -interstate offshore gathering excluding low stress 10/20/85-intrastate pipeline excluding low stress 7/11/91- carbon dioxide pipelines 8/10/94 - low stress pipelines NOTE: This does not include the movement of pipe under 195.424. ***Notes – In procedure P-195.551 Section II		X			
228.	b) Converted under 195.5 and 1) Has an external coating that substantially meets 195.559 before the pipeline is placed in service or; ***Notes – In procedure P-195.551 Section II A		X			
229.	2) Is a segment that is relocated, replaced, or substantially altered? ***Notes – In procedure P-195.551 Section II B		X			
230.	Coating Materials; Coating material for external corrosion control must: a. Be designed to mitigate corrosion of the buried or submerged pipeline; b. Have sufficient adhesion to the metal surface to prevent under film migration of moisture; c. Be sufficiently ductile to resists cracking; d. Have enough strength to resist damage due to handling and soil stress; e. Support any supplemental cathodic protection; and f. If the coating is an insulating type, have low moisture absorption and provide high electrical resistance. .559 ***Notes – In procedure P-195.551 Section III		X			
231.	All external pipe coatings required under 195.557 must be inspected just prior to lowering the pipe in the ditch or submerging the pipe. .561(a) ***Notes – In procedure P-195.551 Section IV A		X			
232.	All coating damage discovered must be repaired. .561(b) ***Notes – In procedure P-195.551 Section IV D		X			
233.	Is cathodic protection applied to pipelines that have been subjected to the conditions listed in 195.557(a) within one (1) year? .563(b) ***Notes – In procedure P-195.551 Section V		X			
	Each buried or submerged pipeline converted under 195.5 must have cathodic protection if the pipeline-					

SUBPART H - CORROSION CONTROL PROCEDURES 195.402(a)			S	U	N/A	N/C
234.		1) Has cathodic protection that substantially meets 195.571 before the pipeline is placed in service, or ***Notes – In procedure P-195.551 Section V A 1	X			
235.		2) Is a segment that is relocated, replaced, or substantially altered? ***Notes – In procedure P-195.551 Section V A 2	X			
236.		c. All other buried or submerged pipelines that have an effective external coating must have cathodic protection. ***Notes – In procedure P-195.551 Section V B	X			
237.		d. Bare pipelines, breakout tank areas, and buried pumping station piping must have cathodic protection in places where previous editions of this part required cathodic protection as a result of electrical inspections. ***Notes – In procedure P-195.551 Section V C	X			
238.		e. Unprotected pipe must have cathodic protection if required by 195.573(b) . ***Notes – In procedure P-195.551 Section V D	X			
239.		Test leads installation and maintenance. .567(b)(c) ***Notes – In procedure P-195.551 Section IV	X			
240.		For placement of test stations at casing? WAC 480-75-340***Notes – In procedure P-195.551 Section IV F	X			
241.		Examination of Exposed Portions of Buried Pipelines. .569***Notes – In procedure P-195.551 Section V	X			
242.		Examination of pipe prior to backfilling. WAC 480-75-520 ***Notes – In procedure P-195.551 Section IV C 1	X			
243.		Cathodic protection must comply with one or more of the applicable criteria and other considerations for cathodic protection contained in paragraphs 6.2 and 6.3 of NACE Standard RP0169-2007 (incorporated by reference). Amdt 195-94, 75 FR 48593, Pub. 8/11/10 eff. 10/01/10. .571 ***Notes – In procedure P-195.551 Section VI	X			
244.		Pipe to soil monitoring (annually / 15months). .573(a) ***Notes – In procedure P-195.551 Section VII	X			
245.		(1) Separately protected short sections of bare ineffectively coated pipelines (every 3 years not to exceed 39 months). ***Notes – In procedure P-195.551 Section VII B	X			
246.		(2) Identify not more than 2 years after cathodic protection is installed, the circumstances in which a close-interval survey or comparable technology is practicable and necessary to accomplish the objectives of paragraph 10.1.1.3 of NACE SP 0169-2007 . Amdt 195-94, 75 FR 48593 Pub. 8/11/10 eff. 10/01/10. ***Notes – In procedure P-195.551 Section VII	X			
		b. Unprotected buried or submerged pipe must be evaluated and cathodically protected in areas in which active corrosion is found as follows;				
247.		1) Determine areas of active corrosion by electrical survey (closely spaced pipe-to-soil survey), or where electrical survey is impractical, by other means that include review of analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipe environment ***Notes – In procedure P-195.551 Section VII B	X			
248.		2) Before 12/29/2003 - at least once every 5 years not to exceed 63 months . Beginning 12/29/2003 - at least once every 3 years not to exceed 39 months . ***Notes – In procedure P-195.551 Section VII C	X			
249.		c. Rectifiers, Reverse Current Switches, Diodes, Interference Bonds whose failure would jeopardize structural protection - at least 6 times each year, intervals not to exceed 2-1/2mos. ***Notes – In procedure P-195.551 Section VII D	X			
250.		d. Inspect each cathodic protection system used to control corrosion on the bottom of an aboveground breakout tank to ensure that operation and maintenance of the system are in accordance with API Recommended Practice 651. (Not required if it is noted in the corrosion control procedures why compliance with all or certain operation and maintenance provisions of API Recommended Practice 651 is not necessary for the safety of the tank.) ***Notes – In procedure P-195.551 Section VII E	X			
251.		e. Any deficiencies identified in corrosion control must be corrected as required by 195.401(b) . ***Notes – In procedure P-195.551 Section VII second paragraph	X			
252.		Remediation of corrosion system deficiencies initiated within 90 days of discovery WAC 480-75-510 ***Notes – In procedure P-195.551 Section VII last sentence	X			
253.		Are there adequate provisions for electrical isolations? .575 ***Notes – In procedure P-195.551 Section VII	X			

SUBPART H - CORROSION CONTROL PROCEDURES 195.402(a)			S	U	N/A	N/C
254.		a. For pipelines exposed to stray currents, is there a program to minimize the detrimental effects. b. Design & install CP systems to minimize effects on adjacent metallic structures. .577 ***Notes – In procedure P-195.551 Section IX	X			
255.		a. For pipelines that transport any hazardous liquid or carbon dioxide that would corrode the pipe, are corrosive effects investigated and adequate steps taken. ***Notes – In procedure P-195.551 Section X	X			
256.		b. Internal Corrosion - Inhibitors - do procedures show that they are to be used in conjunction with coupons or other monitoring equipment to determine the effectiveness of the inhibitors in mitigating internal corrosion. .579***Notes – In procedure P-195.551 Section X 3 i e	X			
257.		Coupons or other monitoring equipment must be examined at least 2 times each year, not to exceed 7-1/2 months. ***Notes – In procedure P-195.551 Section X i i	X			
258.		c. Whenever pipe is removed from a pipeline, the internal surface of the pipe must be inspected for evidence of corrosion as well as the adjacent pipe. ***Notes – In procedure P-195.551 Section IX 2i	X			
259.		Are pipelines protected against Atmospheric Corrosion using required coating material? (See exception to this statement). .581(a)***Notes – In procedure P-195.551 Section XI	X			
		Atmospheric corrosion monitoring - .583 ONSHORE - At least once every 3 years but at intervals not exceeding 39 months. OFFSHORE - At least once each year, but at intervals not exceeding 15 months.				
260.		(b) Inspect pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water. ***Notes – In procedure P-195.551 Section XII	X			
261.		(c) If atmospheric corrosion is found during an inspection, procedures for protection against the corrosion as per §195.581. ***Notes – In procedure P-195.551 Section XII 5 th Paragraph	X			
262.		Are procedures in place and are they followed to either reduce the MOP, or repair/replace pipe if general corrosion has reduced the wall thickness? .585(a)***Notes – In procedure P-195.551 Section XIII	X			
263.		Are procedures in place and are they followed to either reduce the MOP, or repair/replace if localized corrosion has reduced the wall thickness? .585(b)***Notes – In procedure P-195.551 Section XII	X			
264.		Are applicable methods used in determining the strength of corroded pipe (ASME B-31G, RSTRENG)? .587 ***Notes – In procedure P-195.551 Section XIV	X			
265.		Corrosion Control Records Retention (Some are required for 5 yrs) (Note - §§195.569, 195.573(a & b), and 195.579(b)(3) & (c) for the life of the pipeline). .589 ***Notes – In procedure P-195.551 Section XV	X			

PART 199 – DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	N/A	N/C
Subparts A - C	Drug & Alcohol Testing & Alcohol Misuse Prevention Program – Use PHMSA Form # 13, PHMSA Drug and Alcohol Program Check.				

Comments:

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ADB -12-06	May 7, 12	Verification of Records Establishing MAOP and MOP.
ADB-12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
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