Inspection Output (IOR)

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Inspection Information

Inspection Name	8302 Seaport IMP Inspection
Status	STARTED
Start Year	2021
System Type	HL
Protocol Set ID	WA.HL.2021.02

Operator(s)	SEAPORT SOUND TERMINAL, LLC (39906)
Lead	Derek Norwood
Observer(s)	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Scott Anderson, Darren Tinnerstet, Rell Koizumi
Director	Sean Mayo

Plan Submitted	--
Plan Approval	--
All Activity Start	10/18/2021
All Activity End	10/19/2021
Inspection Submitted	--
Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This inspection was conducted at Seaport Sound Terminal in Tacoma, WA on Oct 18-19, 2021. The inspection included an inspection of Seaport's Integrity Management manual and records for the 10" hazardous liquid pipeline and breakout tank (Tank 205). There were no areas of concern or probable violations found as a result of this inspection.

Facilities visited and Total AFOD

AFOD: 2 days

Summary of Significant Findings

There were no areas of concern or probable violations found as a result of this inspection.

Primary Operator contacts and/or participants

Ted Lilyeblade
Terminal Manager
(253) 579-1954

Matthew Kolata
EH&S Specialist
(253) 579-1947

Operator executive contact and mailing address for any official correspondence

Edward Luebke
4130 E 11th St
Tacoma, WA 98421

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88920	Seaport Sound Terminal	unit	88920	Offshore GOM HVL CO2 Biofuels	140	140	140	100.0%

Report Filters: Results: all

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
					Reg Rural Gather Rural Low Stress Abandoned				

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

Plans

Plan #	Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88920	HL IM Implementation, HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail	

Plan Implementations

Activity #	Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	IMP Inspection	--	10/18/2021 10/19/2021	n/a	all planned questions	all assets	all types	140	140	140	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	Procedures - COPY	COMPLETED	10/20/2021	IMP Inspection	88920

Results (all values, 140 results)

152 (instead of 140) results are listed due to re-presentation of questions in more than one sub-group.

AR.EC: External Corrosion Direct Assessment (ECDA)

1. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.O, 195.505 (195.452(b)(5), 195.452(f)(8), 195.555)

   Question Text: *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

   Assets Covered: 88920

   Result Notes: Seaport does not use ECDA

2. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.P, 195.505 (195.452(f)(8), 195.555)

   Question Text: *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*

   Assets Covered: 88920

   Result Notes: Seaport does not use ECDA

3. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.R, 195.507 (195.452(l)(1), 195.555)

Report Filters: Results: all

Question Text *Do the records indicate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

4. Question Result, ID, References NA, AR.EC.ECDAPLAN.P, 195.588(b)(1) (195.588(b)(2) - (5), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text *Is there a process in place for conducting ECDA?*

Assets Covered 88920

Result Notes Seaport does not use ECDA. If they were to use it, the manual says a plan would be drafted prior to use

5. Question Result, ID, References NA, AR.EC.ECDAPREASSESS.R, 195.589(c) (195.588(b)(2), 195.452(l)(1)(ii), 195.452(j)(5)(iii), 195.452(f)(5))

Question Text *Do the records indicate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

6. Question Result, ID, References Sat, AR.EC.ECDAINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.588(b))

Question Text *Does the process include integrating ECDA results with other information?*

Assets Covered 88920

Result Notes IMP Section 4.4

7. Question Result, ID, References NA, AR.EC.ECDAINTEGRATION.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.588(b))

Question Text *Do the records indicate that the operator integrated other data/information when evaluating data/results?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

8. Question Result, ID, References NA, AR.EC.ECDAREGION.R, 195.589(c) (195.588(b)(2)(ii), 195.588(b)(3), 195.588(b)(5)(ii), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii), 195.588(b)(1))

Question Text *Do the records indicate that the operator identified ECDA Regions?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

9. Question Result, ID, References NA, AR.EC.ECDAINDIRECT.R, 195.589(c) (195.588(b)(3), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text *Do the records indicate that the ECDA indirect inspection process complied with NACE SP0502-2010?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

10. Question Result, ID, References NA, AR.EC.ECDADIRECT.R, 195.589(c) (195.588(b)(4), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text *Do the records indicate that excavations, direct examinations, and data collection were performed in accordance with NACE SP0502-2010, Section 5?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

11. Question Result, ID, References NA, AR.EC.ECDADIRECT.O, 195.588(b)(4) (195.588(b)(1), 195.452(b)(5), 195.452(f)(5),)

Question Text *Were ECDA direct examinations conducted in accordance with the plan?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

12. Question Result, ID, References NA, AR.EC.ECDAANALYSIS.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(j)(5)(iii))

Question Text *Do the records indicate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

Report Filters: Results: all

13. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.P, 195.588(b)(4)(iii) (195.452(f)(4))

Question Text *Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

14. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.R, 195.589(c) (195.588(b)(4)(iii), 195.452(l)(1)(ii), 195.452(f)(4))

Question Text *Do the records indicate that changes in the ECDA plan have been implemented and documented?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

15. Question Result, ID, References NA, AR.EC.ECDAPOSTASSESS.R, 195.589(c) (195.588(b)(5), 195.452(l)(1)(ii), 195.452(f)(4))

Question Text *Do the records indicate that the requirements for post assessment were implemented?*

Assets Covered 88920

Result Notes Seaport does not use ECDA

AR.SCC: Stress Corrosion Cracking Direct Assessment (SCCDA)

16. Question Result, ID, References NA, AR.SCC.SCCDAALL.O, 195.588(c) (195.505)

Question Text *From field observations, was SCCDA performed in accordance with the SCCDA plan?*

Assets Covered 88920

Result Notes SCC is considered a low risk by Seaport due to pipe and operating condtitions

AR.IA: Integrity Assessments

17. Question Result, ID, References Sat, AR.IA.METHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)

Question Text *Does the process specify assessment methods that are appropriate for the pipeline integrity threats?*

Assets Covered 88920

Result Notes Integrity Management Plan Section 3

18. Question Result, ID, References Sat, AR.IA.METHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)

Question Text *Do the records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats?*

Assets Covered 88920

Result Notes ILI performed every five years. ILI in 2015 identified mill defects and 2020 ILI identified same areas as metal loss

19. Question Result, ID, References NA, AR.IA.ASSESSSCHEDULE.P, 195.452(f)(5) (195.452(j)(3), 195.452(j)(5), 195.452(e), 195.452(g), 195.591, 195.452(d)(1), 195.452(n))

Question Text *Does the process for assessment include a prioritized schedule in accordance with 195.452(d) for baseline assessments and 195.452 (j) for continual assessments that is based on all the risk factors required by 195.452(e)?*

Assets Covered 88920

Result Notes Seaport only has one segment, no prioritization is necessary

20. Question Result, ID, References Sat, AR.IA.ASSESSSCHEDULE.R, 195.452(l)(1)(ii) (195.452(b)(5), 195.452(c), 195.452(d), 195.452(f)(5), 195.452(j)(3), 195.452(j)(5), 195.591)

Question Text *Do the records indicate that assessments are implemented as specified in the assessment plan?*

Assets Covered 88920

Result Notes ILI performed every five years (2015 and 2020) in accordance with IMP Section 3

21. Question Result, ID, References Sat, AR.IA.REVIEWQUAL.P, 195.452(f)(8) (195.452(g), 195.452(h)(2))

Report Filters: Results: all

Question Text *Does the process specify qualification requirements for personnel who review and evaluate integrity assessment results and information analysis?*

Assets Covered 88920

Result Notes IMP Section 4

22. Question Result, ID, References Sat, AR.IA.REVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g), 195.452(h)(2))

Question Text *Do the records indicate that personnel who review and evaluate integrity assessment results and information analysis are qualified?*

Assets Covered 88920

Result Notes Enduro MFL DFL Data Analysts due for requalification in 2023

Stan Branen due 01/17/23

Becky Utter due 1/15/23

Robert Ward due 1/8/23

23. Question Result, ID, References Sat, AR.IA.STANDARDS.P, 195.452(f)(5) (195.452(b)(6))

Question Text *Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing integrity assessments?*

Assets Covered 88920

Result Notes Integrity Management Plan Section 4.3.2 for ILI

API 1163 and NACE SP0102 for ILI

ANSI ILI-PQ for personnel qualifications

API 1160 reference for risk assessment

24. Question Result, ID, References Sat, AR.IA.STANDARDS.R, 195.452(l)(1)(ii) (195.452(b)(6))

Question Text *Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments?*

Assets Covered 88920

Result Notes ILI performed by Enduro in 2020

AR.IL: In-Line Inspection (Smart Pigs)

25. Question Result, ID, References Sat, AR.IL.ILIIMPLPERQUAL.P, 195.452(f)(5) (195.591)

Question Text *Does the process identify the qualification requirements for personnel who perform ILI (In Line Inspections)?*

Assets Covered 88920

Result Notes IMP Section 4.3.2, Seaport personnel qualified to Launch and Receive Internal Devices (Task 661OP)

26. Question Result, ID, References Sat, AR.IL.ILIIMPLPERQUAL.R, 195.591 (195.452(l)(1)(ii), 195.452(f)(5))

Question Text *Do the records indicate that personnel who perform ILI (In Line Inspections) are qualified and certified (where applicable)?*

Assets Covered 88920

Result Notes Seaport personnel qualified for Launching and Receiving Internal Device

Rob Cohee due 9/8/23

Joshua McAlpin due 5/26/24

Matthew Sheline due 9/23/23

Report Filters: Results: all

Robert Snarski due 9/15/23

Joshua Wilson due 9/8/23

Enduro personnel also qualified

27. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 195.452(f)(8) (195.452(g))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis?*

Assets Covered 88920

Result Notes IMP Section 4.1 and 4.2 ILI Vendor Specifications

28. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g))

Question Text *Do the records indicate that personnel who review and evaluate ILI integrity assessment results and information analysis are qualified?*

Assets Covered 88920

Result Notes Enduro MFL DFL Data Analysts due for requalification in 2023

Stan Branen due 01/17/23

Becky Utter due 1/15/23

Robert Ward due 1/8/23

29. Question Result, ID, References Sat, AR.IL.ILISPECS.P, 195.452(f)(5) (195.452(h), 195.452(j), 195.591)

Question Text *Does the process include adequate ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization?*

Assets Covered 88920

Result Notes IMP Section 4.2 and 4.3.2

30. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.P, 195.452(f)(4) (195.452(j)(5)(i), 195.452(h), 195.591)

Question Text *Does the process include the validation of ILI results?*

Assets Covered 88920

Result Notes IMP Section 4.3.2 and 4.4

31. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.R, 195.452(l)(1)(ii) (195.452(j)(5)(i), 195.452(f)(4), 195.452(h), 195.452(c)(1), 195.591, 195.452(c)(1)(i)(A))

Question Text *Do the records for validating ILI assessment results indicate that the process was implemented?*

Assets Covered 88920

Result Notes Seaport performed internal review of ILI data and compared it to 2015 run along with pipeline history data. They also hired Integrity Solutions to analyze and compare the two ILI runs

32. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.452(h))

Question Text *Does the process for evaluating ILI results include integration of all available information about the integrity of the pipeline?*

Assets Covered 88920

Result Notes IMP Section 4.4

33. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(h))

Question Text *Do the records indicate that the operator integrated other data/information when evaluating ILI tool data/results?*

Assets Covered 88920

Result Notes Incorporated ROW patrols, CP testing, past ILI runs, construction records into their analysis

Report Filters: Results: all

34. Question Result, ID, References NA, AR.IL.ILIIMPLEMENT.O, 195.452(b)(5)

    Question Text *Have the ILI procedures been followed?*

    Assets Covered 88920

    Result Notes No such activity/condition was observed during the inspection.

AR.PTI: Integrity Assessment Via Pressure Test

35. Question Result, ID, References Sat, AR.PTI.PRESSTESTACCEP.P, 195.452(f)(5) (195.304, 195.305, 195.306, 195.308, 195.452(j)(5)(ii))

    Question Text *Does the process define acceptance criteria for a successful pressure test?*

    Assets Covered 88920

    Result Notes IMP Section 3

36. Question Result, ID, References Sat, AR.PTI.PRESSTESTCORR.P, 195.452(f)(3) (195.452(g)(3))

    Question Text *Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?*

    Assets Covered 88920

    Result Notes IMP Section 3

37. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.O, 195.452(b)(5) (195.452(c)(1)(i)(b), 195.452(j)(5)(ii), 195.304)

    Question Text *Was the pressure test conducted in accordance with the procedures?*

    Assets Covered 88920

    Result Notes No such activity/condition was observed during the inspection.

38. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.R, 195.310 (195.452(f)(2), 195.452(f)(5), 195.452(c), 195.452(l)(1)(ii))

    Question Text *Do the pressure test records indicate compliance with Part 195, Subpart E?*

    Assets Covered 88920

    Result Notes No such event occurred, or condition existed, in the scope of inspection review.

39. Question Result, ID, References NA, AR.PTI.PRESSTESTCORR.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g)(3))

    Question Text *When pressure testing was used as the integrity assessment method, do the records indicate that the effectiveness of the corrosion control program was documented?*

    Assets Covered 88920

    Result Notes Pressure testing has not been used as an integrity assessment method

AR.OT: Other Technology

40. Question Result, ID, References Sat, AR.OT.OTPLAN.P, 195.452(f)(5) (195.452(c)(1)(i)(D), 195.452(j)(5)(iv), 195.416(d))

    Question Text *If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe?*

    Assets Covered 88920

    Result Notes IMP Section 3 and 4.7

41. Question Result, ID, References NA, AR.OT.OTPLAN.R, 195.452(l)(1)(ii) (195.452(j)(5)(iv), 195.452(f)(5), 195.452(c)(1)(i)(D), 195.416(d))

    Question Text *Do the records indicate that the Other Technology integrity assessments were performed in accordance with procedures and vendor recommendations?*

    Assets Covered 88920

    Result Notes No such event occurred, or condition existed, in the scope of inspection review.

42. Question Result, ID, References NA, AR.OT.OTPLAN.O, 195.452(b)(5) (195.416(d))

    Question Text *Has the process for the use of "Other Technology" been followed?*

    Assets Covered 88920

Report Filters: Results: all

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

43. Question Result, ID, References Sat, AR.OT.ASSESSMENTREVIEW.P, 195.452(f)(8) (195.452(j)(5), 195.416(d))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology?*

Assets Covered 88920

Result Notes IMP Section 4.1 and 4.2

44. Question Result, ID, References NA, AR.OT.ASSESSMENTREVIEW.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(j)(5), 195.416(d))

Question Text *Do the records pertaining to the selected integrity assessments indicate that personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology are qualified?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.RCHCA: Repair Criteria (HCA)

45. Question Result, ID, References Sat, AR.RCHCA.DISCOVERY.P, 195.452(f)(4) (195.452(h)(2))

Question Text *Does the integrity assessment process define "discovery of condition" and the required time frame for anomalies in a pipeline segment that can affect an HCA?*

Assets Covered 88920

Result Notes IMP Section 6 (Discovery of Condition)

IMP Section 4.5 (Repair Timeframes)

46. Question Result, ID, References Sat, AR.RCHCA.IMSCHEDULE.P, 195.452(f)(4) (195.452(h)(3), 195.452(h)(4))

Question Text *Does the process include developing a prioritized schedule for evaluating and remediating all identified repair conditions consistent with the repair criteria and within the time frames found in 195.452(h)(4)?*

Assets Covered 88920

Result Notes IMP Section 4.5

47. Question Result, ID, References NA, AR.RCHCA.DISCOVERY.R, 195.452(l)(1)(ii) (195.452(h)(2), 195.452(f)(4))

Question Text *Do the records indicate that "discovery of condition" results for all anomalies occurred promptly, but no later than 180 days after the completion of the integrity assessment?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

48. Question Result, ID, References Sat, AR.RCHCA.IMPRC.P, 195.452(f)(4) (195.452(h)(1), 195.452(h)(4))

Question Text *Does the process include criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?*

Assets Covered 88920

Result Notes IMP Section 5.1

49. Question Result, ID, References NA, AR.RCHCA.REMEDIATION.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4), 195.452(b)(5), 195.569)

Question Text *Do records indicate that anomaly remediation and documentation of remediation was performed in accordance with the process?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

50. Question Result, ID, References NA, AR.RCHCA.IMPRC.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(1), 195.452(h)(4))

Question Text *Do records indicate that prompt action was taken to address all anomalous conditions discovered through the integrity assessment or information analysis?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

51. Question Result, ID, References NA, AR.RCHCA.REMEDIATION.O, 195.452(b)(5) (195.402(a), 195.402(c)(14), 195.422(a), 195.569, 195.589(c))

Question Text *From an observation of a remediation or repair at an excavation site, are anomaly remediation activities adequate, performed in accordance with the categorized remediation/repair schedule, and documented?*

Assets Covered 88920

Result Notes No such activity/condition was observed during the inspection.

52. Question Result, ID, References Sat, AR.RCHCA.REMEDIATION.P, 195.452(f)(4) (195.452(h)(1), 195.422(b))

Question Text *Does the process require that remedial actions be performed in a manner that addresses the integrity issues raised by the assessment methods used and information analysis?*

Assets Covered 88920

Result Notes IMP Section 5.1

53. Question Result, ID, References Sat, AR.RCHCA.PRESSREDUCE.P, 195.452(f)(4) (195.428, 195.452(h)(1)(i), 195.452(h)(1)(ii))

Question Text *Does the process for pressure reduction meet the code requirements?*

Assets Covered 88920

Result Notes IMP Section 5.1 and 6

54. Question Result, ID, References NA, AR.RCHCA.PRESSREDUCE.R, 195.452(l)(1)(ii) (195.404(a), 195.404 (b), 195.452(h)(1)(ii), 195.452(h)(4)(i), 195.55(a), 195.56)

Question Text *Do the integrity assessment records indicate that the pressure reduction taken was acceptable and promptly implemented?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

55. Question Result, ID, References NA, AR.RCHCA.IMSCHEDULE.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4))

Question Text *Do the records indicate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(4)?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

56. Question Result, ID, References Sat, AR.RCHCA.CRACKREMEDIATION.P, 195.452(f)(4) (195.452(h), 195.588(c))

Question Text *If the pipeline is susceptible to cracking, does the process include criteria for remedial actions to address integrity issues raised by the assessment method?*

Assets Covered 88920

Result Notes IMP Section 4.5

57. Question Result, ID, References NA, AR.RCHCA.CRACKREMEDIATION.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(4)(iii)(G), 195.588(c))

Question Text *If the pipeline is susceptible to cracking, do the records indicate that the remedial actions have been documented?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.RMP: Repair Methods and Practices

58. Question Result, ID, References Sat, AR.RMP.SAFETY.P, 195.402(c)(14) (195.422(a), 195.452(h)(1))

Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*

Assets Covered 88920

Result Notes O&M Section 12 - Pipeline Repairs

Report Filters: Results: all

59. Question Result, ID, References — NA, AR.RMP.SAFETY.O, 195.422(a) (195.402(c)(14), 195.452(h)(1))

Question Text *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?*

Assets Covered 88920

Result Notes No such activity/condition was observed during the inspection.

60. Question Result, ID, References — Sat, AR.RMP.METHOD.P, 195.402(c)(3) (195.452(h)(1), 195.585)

Question Text *Does the process identify permissible repair methods for each type of defect?*

Assets Covered 88920

Result Notes Section 5.1 references repair procedures in O&M

Field Repair of Pipeline and Testing Procedure

61. Question Result, ID, References — NA, AR.RMP.METHOD.R, 195.404(c)(1) (195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1), 195.401(b)(2))

Question Text *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

62. Question Result, ID, References — NA, AR.RMP.REPAIRQUAL.R, 195.505(b) (195.507(a), 195.505(c), 195.452(h)(1), 195.452(b)(5))

Question Text *From the records review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

63. Question Result, ID, References — NA, AR.RMP.PIPECONDITION.R, 195.404(c)(1) (195.404(c)(2), 195.452(l)(1)(ii))

Question Text *Do the repair records document all the information needed to understand the conditions of the pipe and its environment and also provide the information needed to support the Integrity Management program, when applicable?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

64. Question Result, ID, References — NA, AR.RMP.REPLACESTD.R, 195.404(a)(1) (195.422(b),)

Question Text *Were all replaced line pipe and/or components designed and constructed as required by Part 195?*

Assets Covered 88920

Result Notes No replaced line pipe

65. Question Result, ID, References — NA, AR.RMP.PIPEMOVE.R, 195.424(a) (195.424(b), 195.424(c))

Question Text *From a review of selected records, were pipeline movements performed in accordance with 195.424?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

66. Question Result, ID, References — NA, AR.RMP.WELDERQUAL.R, 195.214(a) (195.214(b), 195.222(a), 195.222(b),)

Question Text *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

67. Question Result, ID, References — NA, AR.RMP.WELDQUAL.R, 195.226(a) (195.226(b), 195.226(c), 195.230(a), 195.230(b), 195.230(c),)

Question Text *From the review of the results of integrity assessment and remediation projects, were defects on new welds repaired in accordance with 195.226 or 195.230?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Report Filters: Results: all

68. Question Result, ID, References NA, AR.RMP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234(a), 195.234(b), 195.234(c), 195.234(d), 195.234(e),)

Question Text *From the review of the results of remediation projects, were new welds inspected and examined in accordance with 195.228 or 195.234?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

69. Question Result, ID, References Sat, AR.RMP.CRACKNDE.P, 195.452(f)(4) (195.452(h))

Question Text *Does the process include appropriate NDE method(s) and other information gathering during the evaluation of cracks and cracking?*

Assets Covered 88920

Result Notes IMP Section 4.5

Manual reference ASME B31.4 which includes NDE for cracking

70. Question Result, ID, References NA, AR.RMP.CRACKNDE.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h), 195.404(c))

Question Text *Do the records indicate that appropriate NDE method(s) were used and other information was gathered related to the evaluation of cracking?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

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

71. Question Result, ID, References Sat, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: IM.FACIL)

Question Text *Does the program include a written process for identification of facilities that could affect an HCA?*

Assets Covered 88920

Result Notes IMP Section 2

72. Question Result, ID, References Sat, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(3)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*

Assets Covered 88920

Result Notes Entire pipeline and breakout tank could affect an HCA

73. Question Result, ID, References Sat, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

Question Text *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*

Assets Covered 88920

Result Notes FRP identifies and has calculations for worst case discharge which is 3,652 barrels from the pipe and/or breakout tank

74. Question Result, ID, References Sat, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

Question Text *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*

Assets Covered 88920

Result Notes Calculations completed

75. Question Result, ID, References Sat, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

Question Text *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*

Assets Covered 88920

Result Notes FRP and Seaport's Geographical Resource Tool identifies storm drains where a release could get into a waterway along with potential volume released along the pipeline

76. **Question Result, ID, References** Sat, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

Question Text *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*

Assets Covered 88920

Result Notes FRP and Seaport's Geographical Resource Tool identifies storm drains where a release could get into a waterway along with potential volume released along the pipeline

77. **Question Result, ID, References** Sat, 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 88920

Result Notes IMP Section 8.1

78. **Question Result, ID, References** Sat, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*

Assets Covered 88920

Result Notes Pipeline

- Monthly rectifier inspection
- Extra markers
- Depth of Cover
- Leak Detection exceeds WAC requirements

Breakout Tank

- Monthly rectifier inspection
- 3x boom deployment every year
- Drills
- Quarterly LEPC meeting
- Tank level monitored 24 hours

79. **Question Result, ID, References** Sat, 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 88920

Result Notes IMP Section 8.1

80. **Question Result, ID, References** Sat, IM.FACIL.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

Assets Covered 88920

81. **Question Result, ID, References** Sat, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: IM.FACIL)

Question Text *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*

Assets Covered 88920

Result Notes ROW Patrol with Seaport and Breakout Tank Inspection, Facilities looked good

IM.HC: High Consequence Areas

82. **Question Result, ID, References** Sat, IM.HC.HCALOCATION.P, 195.452(f)(1) (195.452(a), 195.452(d)(3), 195.452(b)(2))

Report Filters: Results: all

Question Text *Does the process require the identification of HCA-affecting pipe segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?*

Assets Covered 88920

Result Notes IMP Section 2

83. Question Result, ID, References Sat, IM.HC.HCALOCATION.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a), 195.452(b)(2), 195.452(d)(3), 195.452(j)(1))

Question Text *Do records indicate that locations and boundaries of HCA-affecting pipe segments are correctly identified and maintained up-to-date?*

Assets Covered 88920

Result Notes Entire pipeline and breakout tank are in an HCA

84. Question Result, ID, References Sat, IM.HC.HCALOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2)) (also presented in: IM.CA)

Question Text *Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?*

Assets Covered 88920

Result Notes Field observations are consistent with what Seaport has determined

85. Question Result, ID, References Sat, IM.HC.HCAIDENT.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include all locations where pipeline segments directly intersect a high consequence area?*

Assets Covered 88920

Result Notes IMP Section 2

86. Question Result, ID, References NA, IM.HC.HCAIDENT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that all locations where a pipeline segment is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate technical justification is provided?*

Assets Covered 88920

Result Notes Entire pipeline is in an HCA and Seaport has not made any exceptions

87. Question Result, ID, References Sat, IM.HC.HCARELEASE.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include methods to determine the locations and volume of potential commodity releases?*

Assets Covered 88920

Result Notes Worst case discharge calculated in the Facility Response Plan

88. Question Result, ID, References NA, IM.HC.HCARELEASE.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that identified release locations and spill volumes are consistent with the documented process?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

89. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*

Assets Covered 88920

Result Notes IMP Section 2.3

FRP

90. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that the analysis of overland spread is consistent with the documented process?*

Assets Covered 88920

Report Filters: Results: all

Result Notes Geographical Response Tool identifies storm drains that could release product into a waterway. It also has a Spill Impact Analysis which shows how much product release and the overland spread

91. Question Result, ID, References Sat, IM.HC.HCAH2OTRANSP.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include the analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*

Assets Covered 88920

Result Notes Geographical Response Tool identifies storm drains that could release product into a waterway.

IMP Section 2.3

92. Question Result, ID, References Sat, IM.HC.HCAH2OTRANSP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that water transport analysis is consistent with the documented process?*

Assets Covered 88920

Result Notes Geographical Response Tool identifies storm drains that could release product into a waterway

93. Question Result, ID, References Sat, IM.HC.HCAAIRDISP.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include the analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?*

Assets Covered 88920

Result Notes IMP Section 2.3.6

94. Question Result, ID, References Sat, IM.HC.HCAAIRDISP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do the records indicate that the analysis of air dispersion of vapors is consistent with the documented process?*

Assets Covered 88920

Result Notes Study done by Trinity Consultants in 2014, identifies emission rate and radius of impact

95. Question Result, ID, References Sat, IM.HC.HCAINDIRECT.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include all locations of pipeline segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?*

Assets Covered 88920

Result Notes IMP Section 2.3.1

96. Question Result, ID, References NA, IM.HC.HCAINDIRECT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do the records indicate that endpoints of pipeline segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?*

Assets Covered 88920

Result Notes Entire pipeline is in an HCA

97. Question Result, ID, References Sat, IM.HC.HCACAT3.P, 195.452(f)(1) (195.452(b)(2), 195.452(a)(3))

Question Text *Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered 88920

98. Question Result, ID, References Sat, IM.HC.HCACAT3.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(b)(2), 195.452(a)(3))

Question Text *Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered 88920

Result Notes HCA Processes in place 04/2013 completed by Targa

IM.RA: Risk Analysis

99. Question Result, ID, References Sat, IM.RA.RADATA.O, 195.452(b)(5) (195.452(f)(3))

Question Text *Are field conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*

Assets Covered 88920

Result Notes Field conditions are consistent with what Seaport has identified

100. Question Result, ID, References Sat, IM.RA.RADATA.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text *Does the process include an analysis and integration of all available information about the integrity of the entire pipeline and the consequences of a failure?*

Assets Covered 88920

Result Notes IMP Section 7

101. Question Result, ID, References Sat, IM.RA.RADATA.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text *Do the records indicate that all available information has been integrated into the risk analysis?*

Assets Covered 88920

Result Notes Risk Analysis performed in 2014, 2015, 2017 and 2021. Data appears to be incorporated into risk analysis

102. Question Result, ID, References Sat, IM.RA.RAMETHOD.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text *Does the process include methodology for evaluating risk to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?*

Assets Covered 88920

Result Notes IMP Section 7

103. Question Result, ID, References Sat, IM.RA.RARESULTS.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text *Do the records indicate that the results of the risk analysis process are useful for drawing conclusions and insights for decision making?*

Assets Covered 88920

Result Notes Use ILI data to help determine inspection frequency and operational data to help with tool selection

104. Question Result, ID, References NA, IM.RA.RASEGMENT.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text *Does the risk analysis process consider and incorporate the variation in risk factors along the pipeline such that segment-specific risk results and insights are obtained?*

Assets Covered 88920

Result Notes Seaport does not subdivide segments

105. Question Result, ID, References Sat, IM.RA.RAMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(e))

Question Text *Do the records indicate the evaluation of the methodology(ies) used for evaluating risks to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?*

Assets Covered 88920

Result Notes All risks in the manual have been included in the 2021 risk assessment. Data seems to be complete

IM.CA: Continual Evaluation and Assessment

106. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 195.452(f)(5) (195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text *Does the process include requirements for performing periodic evaluations of pipeline integrity?*

Assets Covered 88920

Result Notes IMP Section 9.1

107. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text *Do records indicate that evaluations of pipeline integrity are being performed periodically?*

Assets Covered 88920

Report Filters: Results: all

Result Notes ILI performed in 2015 and 2020

108. Question Result, ID, References Sat, IM.HC.HCALOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2))
(also presented in: IM.HC)

Question Text *Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?*

Assets Covered 88920

Result Notes Field observations are consistent with what Seaport has determined

109. Question Result, ID, References Sat, IM.CA.ASSESSINTERVAL.P, 195.452(f)(5) (195.452(e), 195.452(g), 195.452(j)(3))

Question Text *Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval?*

Assets Covered 88920

Result Notes IMP Section 7 and 9

Seaport has identified a 5 year inspection interval based on risk of pipeline

110. Question Result, ID, References Sat, IM.CA.ASSESSINTERVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(3), 195.452(g))

Question Text *Do the records indicate that the assessment intervals are consistent with the risks identified for the pipe segment and the results of previous assessments?*

Assets Covered 88920

Result Notes Reviewed 2021 risk assessment which supports a 5-year inspection interval

111. Question Result, ID, References Sat, IM.CA.ASSESSMETHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)

Question Text *Does the process specify assessment methods that are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered 88920

Result Notes IMP Section 3 and 9.1

112. Question Result, ID, References Sat, IM.CA.ASSESSMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)

Question Text *Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered 88920

Result Notes ILI has found some anomalies which could be metal loss or manufacturing defects

113. Question Result, ID, References Sat, IM.CA.ASSESSNOTIFY.P, 195.452(f)(5) (195.452(j)(4), 195.452(m))

Question Text *Does the process include methodology for submitting variance notifications to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered 88920

Result Notes IMP Section 9.5

114. Question Result, ID, References NA, IM.CA.ASSESSNOTIFY.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(m), 195.452(j)(4))

Question Text *Do the records indicate that variance notifications been submitted to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

IM.PM: Preventive and Mitigative Measures

115. Question Result, ID, References Sat, IM.PM.PMMMEASURES.P, 195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section III, API Standard 1160)

Question Text *Does the Integrity Management Program include a process for the identification and evaluation of preventive & mitigative measures (P&M measures), resulting from the risk analysis, to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area (HCA)?*

Assets Covered 88920

Report Filters: Results: all

Result Notes IMP Section 8

116. Question Result, ID, References Sat, IM.PM.PMMMEASURES.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section VI, API Standard 1160)

Question Text *Do records demonstrate that the process of identification and evaluation for Preventive & Mitigative Measures (P&M Measures) has been applied in accordance with the documented process?*

Assets Covered 88920

Result Notes IM assessments are being used to identify pipeline threats, various daily inspections, monitored 24/7, drills, extra training for personnel, monthly rectifier inspections, unannounced coast guard drills, quarterly liaison with LEPC, extra markers along ROW

117. Question Result, ID, References Sat, IM.PM.PMMIMPLEMENT.O, 195.452(b)(5) (195.452(i)(1), 195.452(i)(2), 195.452(i)(3), 195.452(i)(4))

Question Text *Have preventive and mitigative actions been implemented as described in the records?*

Assets Covered 88920

118. Question Result, ID, References Sat, IM.PM.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))

Question Text *Do the records indicate that mitigative actions have been considered and implemented?*

Assets Covered 88920

Result Notes Leak detection is in excess of WAC requirements of 8% in 15 minutes, ~1.7% in 15 minutes

119. Question Result, ID, References Sat, IM.PM.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))

Question Text *Do the records indicate that preventive actions have been considered and implemented?*

Assets Covered 88920

Result Notes IM assessments are being used to identify pipeline threats, various daily inspections, monitored 24/7, drills, extra training for personnel, monthly rectifier inspections, unannounced coast guard drills, quarterly liaison with LEPC, extra markers along ROW

120. Question Result, ID, References Sat, IM.PM.PMMRISKANALYSIS.P, 195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section II, API Standard 1160)

Question Text *Does the Integrity Management Program include conducting a risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection?*

Assets Covered 88920

Result Notes IMP Section 7 and 8

121. Question Result, ID, References Sat, IM.PM.PMMRISKANALYSIS.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section VI, API Standard 1160)

Question Text *Do records demonstrate that an adequate risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection was performed?*

Assets Covered 88920

Result Notes Risk Analysis completed 8/4/21

122. Question Result, ID, References Sat, IM.PM.IMLEAKDETEVAL.P, 195.452(f)(6) (195.452(i)(3), 195 Appendix C, Section III, API Standard 1160)

Question Text *Does the Integrity Management Program include a process for the evaluation of leak detection capabilities and modifying, as necessary, to protect the high consequence areas?*

Assets Covered 88920

Result Notes IMP Section 8.2

123. Question Result, ID, References Sat, IM.PM.IMLEAKDETEVAL.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(3), 195 Appendix C, Section VI, API Standard 1160)

Question Text *Do records indicate that all required and other relevant leak detection evaluation factors have been evaluated to ensure the protection of HCAs?*

Assets Covered 88920

Result Notes Reviewed leak detection system commissioning and testing records

124. Question Result, ID, References Sat, IM.PM.PMMEFRD.P, 195.452(f)(6) (195.452(i)(4), 195.452(i)(1), 195.452(i)(2), API Standard 1160)

Question Text *Does the Integrity Management Program include a preventive & mitigative (P&M) measures process that specifically addresses the identification, evaluation, and application of EFRDs to protect high consequence areas in the event of a hazardous liquid pipeline release?*

Report Filters: Results: all

Assets Covered 88920

Result Notes IMP Section 8.3

EFRDs identified in risk assessment and possible P&M measure but Seaport has listed it as not practical due to location of pipeline and construction

125. Question Result, ID, References Sat, IM.PM.PMMEFRD.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(4), 195 Appendix C, Section VI, API Standard 1160)

Question Text *Do the records demonstrate that all required and other relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?*

Assets Covered 88920

Result Notes EFRDs identified in risk assessment and possible P&M measure but Seaport has listed it as not practical due to location of pipeline and construction

IM.FACIL: Facilities

126. Question Result, ID, References Sat, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: TDC.IMFACIL)

Question Text *Does the program include a written process for identification of facilities that could affect an HCA?*

Assets Covered 88920

Result Notes IMP Section 2

127. Question Result, ID, References Sat, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(3)) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*

Assets Covered 88920

Result Notes Entire pipeline and breakout tank could affect an HCA

128. Question Result, ID, References Sat, 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 88920

Result Notes IMP Section 7

129. Question Result, ID, References Sat, 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 88920

Result Notes Breakout tank risk assessment completed 10/2021

130. Question Result, ID, References Sat, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*

Assets Covered 88920

Result Notes FRP identifies and has calculations for worst case discharge which is 3,652 barrels from the pipe and/or breakout tank

131. Question Result, ID, References Sat, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*

Assets Covered 88920

Result Notes Calculations completed

132. Question Result, ID, References Sat, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*

Assets Covered 88920

Result Notes FRP and Seaport's Geographical Resource Tool identifies storm drains where a release could get into a waterway along with potential volume released along the pipeline

133. Question Result, ID, References Sat, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*

Assets Covered 88920

Result Notes FRP and Seaport's Geographical Resource Tool identifies storm drains where a release could get into a waterway along with potential volume released along the pipeline

134. Question Result, ID, References NA, IM.FACIL.AIRDISP.P, 195.452(f)(1) (195.452(l)(1)(i))

Question Text *Where the facility handles HVLs or Volatile Liquids, does the process include an analysis of the air dispersion of vapors released from the facility to determine effects on HCAs?*

Assets Covered 88920

Result Notes Seaport does not transport HVLs

135. Question Result, ID, References NA, IM.FACIL.AIRDISP.R, 195.452(l)(1)(ii)

Question Text *Where the facility handles HVLs or Volatile Liquids, do the records indicate that the analysis of air dispersion of vapors from the facility is consistent with the process requirements?*

Assets Covered 88920

Result Notes Seaport does not transport HVLs

136. Question Result, ID, References Sat, 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 88920

Result Notes IMP Section 9.1

137. Question Result, ID, References Sat, IM.FACIL.PERIODEVAL.R, 195.452(l)(1)(ii) (195.452(j)(2))

Question Text *Do the records indicate that periodic evaluations of integrity at facilities affecting HCAs have been performed?*

Assets Covered 88920

Result Notes In-service inspection completed by Mistras in March 2018, Out of service inspection scheduled 2022

138. Question Result, ID, References Sat, 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 88920

Result Notes IMP Section 8.1

139. Question Result, ID, References Sat, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*

Assets Covered 88920

Result Notes Pipeline

- Monthly rectifier inspection
- Extra markers
- Depth of Cover
- Leak Detection exceeds WAC requirements

Breakout Tank

- Monthly rectifier inspection
- 3x boom deployment every year

Report Filters: Results: all

- Drills
- Quarterly LEPC meeting
- Tank level monitored 24 hours

140. **Question Result, ID, References** Sat, IM.FACIL.PMMMITIGATIVE.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 88920

    Result Notes IMP Section 8.1

141. **Question Result, ID, References** Sat, IM.FACIL.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

    Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

    Assets Covered 88920

142. **Question Result, ID, References** Sat, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: TDC.IMFACIL)

    Question Text *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*

    Assets Covered 88920

    Result Notes ROW Patrol with Seaport and Breakout Tank Inspection, Facilities looked good

IM.QA: Quality Assurance

143. **Question Result, ID, References** Sat, IM.QA.IMPERFEFECTIVE.P, 195.452(f)(7) (195.452(k))

    Question Text *Does the process for evaluating IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*

    Assets Covered 88920

    Result Notes IMP Section 10.1

144. **Question Result, ID, References** Sat, IM.QA.IMPERFEFECTIVE.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 88920

    Result Notes Hired Integrity Solutions to conduct comparison between the two ILI runs, perform risk analysis periodically and review the manual

145. **Question Result, ID, References** Sat, IM.QA.RECORDS.P, 195.402(c)(3) (195.452(l)(1))

    Question Text *Does the process ensure that the records required for the integrity management program are maintained?*

    Assets Covered 88920

    Result Notes IMP Section 10.3

146. **Question Result, ID, References** Sat, IM.QA.IMPERFMETRIC.P, 195.452(f)(7) (195.452(k))

    Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*

    Assets Covered 88920

    Result Notes IMP Section 10.1

147. **Question Result, ID, References** Sat, IM.QA.IMPERFMETRIC.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

    Question Text *Do the records indicate that performance metrics are providing meaningful insight into integrity management program performance?*

    Assets Covered 88920

Report Filters: Results: all

Result Notes Hired Integrity Solutions to conduct comparison between the two ILI runs, perform risk analysis periodically and review the manual

148. Question Result, ID, References Sat, IM.QA.RECORDS.R, 195.452(l)(1)(ii)

Question Text *Do the records indicate that the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity?*

Assets Covered 88920

RPT.NR: Notices and Reporting

149. Question Result, ID, References Sat, RPT.NR.NOTIFYIMP.P, 195.452(f)(5) (195.452(j)(4), 195.452(h)(1), 195.452(m))

Question Text *Does the process include a requirement for submitting an IMP notification for each of the following circumstances: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered 88920

Result Notes IMP Section 5.1 and 9.5

150. Question Result, ID, References NA, RPT.NR.NOTIFYIMP.R, 195.452(l)(1)(ii) (195.452(m), 195.452(j)(4), 195.452(h)(1), 195.452(c)(1))

Question Text *Do the records indicate that the operator submitted IMP notification(s) for any of the following circumstances, when it was necessary to do so: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered 88920

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

RPT.RR: Regulatory Reporting (Traditional)

151. Question Result, ID, References Sat, RPT.RR.ANNUALREPORTIMINSPECT.R, 195.49

Question Text *Do the records indicate that the Annual Report Part F Data is complete and accurate?*

Assets Covered 88920

Result Notes Reviewed 2020 annual report, Parts F and G were accurate and included ILI data

152. Question Result, ID, References Sat, RPT.RR.ANNUALREPORTIMASSESS.R, 195.49

Question Text *Is Annual Report Part G data complete and accurate?*

Assets Covered 88920

Result Notes Reviewed 2020 annual report, Parts F and G were accurate and included ILI data

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Report Parameters: Results: all

Report Filters: Results: all