Inspection Output (IOR)

Generated on 2022.July.11 07:38

Report Filters

Assets All, and including items not linked to any asset.
Results Unsat,Concern

Inspection Information

Inspection Name 8461 - Tidewater LIMP	Operator(s) TIDEWATER, INC (31051)	Plan Submitted 02/15/2022
Status PLANNED	Lead Scott Anderson	Plan Approval 02/16/2022 by Sean Mayo
Start Year 2022	Team Members David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Darren Tinnerstet	
System Type HL		All Activity Start 06/27/2022
Protocol Set ID WA.HL.2021.02	Observer(s) Deborah Becker, Rell Koizumi	All Activity End 06/29/2022
	Supervisor Scott Rukke	Inspection Submitted --
	Director Sean Mayo	Inspection Approval --

Inspection Summary

Inspection Scope and Summary

This inspection included a review of Tidewater's Integrity Management Plan which covers the 6" Inbound/Outbound system, 4" Pasco Diesel Rail Line, and breakout tanks at the Snake River Terminal. Associated records were also reviewed.

Facilities visited and Total AFOD

3 AFOD

Summary of Significant Findings

No findings

Primary Operator contacts and/or participants

Kelly Harding, Operations Manager, Tidewater

Mark Davis, General Manger, Tidewater

Chris Riggins, Maintenance Manager, Tidewater

Josh Jarman, Quality & Compliance Manager, Tidewater

Operator executive contact and mailing address for any official correspondence

William J. (Bill) Collins

6305 Northwest Old Lower River Road

Vancouver, WA 98660

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88982 (1019)	Tidewater - Snake River Terminal	unit	88982	Pump Stations Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress	140	140	140	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88982 (1019)	HL IM Implementation, HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	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	--	06/27/2022 06/29/2022	HL IM Implementation, HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	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

This inspection has no Form data entry.

Results (Unsat,Concern values, 0 results)

This inspection has no matching Results.

Inspection Results (IRR)

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- 88982 (1019) (152)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88982 (1019)

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
1.	88982 (1019)	NA		AR.EC	1.	AR.EC.ECDAREVQUAL.O	195.505 (195.452(b)(5), 195.452(f)(8), 195.555)	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?
2.	88982 (1019)	NA		AR.EC	2.	AR.EC.ECDAREVQUAL.P	195.505 (195.452(f)(8), 195.555)	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?
3.	88982 (1019)	NA		AR.EC	3.	AR.EC.ECDAREVQUAL.R	195.507 (195.452(l)(1), 195.555)	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?
4.	88982 (1019)	NA		AR.EC	4.	AR.EC.ECDAPLAN.P	195.588(b)(1) (195.588(b)(2) - (5), 195.452(f)(5), 195.452(j)(5)(iii))	Is there a process in place for conducting ECDA?
5.	88982 (1019)	NA		AR.EC	5.	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))	Do the records indicate that the ECDA pre-assessment process complied with NACE

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
								SP0502-2010 Section 3?
6.	88982 (1019)	NA		AR.EC	6.	AR.EC.ECDAINTEGRATION.P	195.452(f)(3) (195.452(g), 195.588(b))	Does the process include integrating ECDA results with other information?
7.	88982 (1019)	NA		AR.EC	7.	AR.EC.ECDAINTEGRATION.R	195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.588(b))	Do the records indicate that the operator integrated other data/information when evaluating data/results?
8.	88982 (1019)	NA		AR.EC	8.	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))	Do the records indicate that the operator identified ECDA Regions?
9.	88982 (1019)	NA		AR.EC	9.	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))	Do the records indicate that the ECDA indirect inspection process complied with NACE SP0502-2010?
10.	88982 (1019)	NA		AR.EC	10.	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))	Do the records indicate that excavations, direct examinations, and data collection were performed in accordance with NACE SP0502-2010, Section 5?
11.	88982 (1019)	NA		AR.EC	11.	AR.EC.ECDADIRECT.O	195.588(b)(4) (195.588(b)(1), 195.452(b)(5), 195.452(f)(5),)	Were ECDA direct examinations conducted in accordance with the plan?
12.	88982 (1019)	NA		AR.EC	12.	AR.EC.ECDAANALYSIS.R	195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(j)(5)(iii))	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?
13.	88982 (1019)	NA		AR.EC	13.	AR.EC.ECDAPLANMOC.P	195.588(b)(4)(iii) (195.452(f)(4))	Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?
14.	88982 (1019)	NA		AR.EC	14.	AR.EC.ECDAPLANMOC.R	195.589(c) (195.588(b)(4)(iii),	Do the records indicate that changes in the

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
							195.452(l)(1)(ii), 195.452(f)(4))	ECDA plan have been implemented and documented?
15.	88982 (1019)	NA		AR.EC	15.	AR.EC.ECDAPOSTASSESS.R	195.589(c) (195.588(b)(5), 195.452(l)(1)(ii), 195.452(f)(4))	Do the records indicate that the requirements for post assessment were implemented?
16.	88982 (1019)	NA		AR.SCC	10.	AR.SCC.SCCDAALL.O	195.588(c) (195.505)	From field observations, was SCCDA performed in accordance with the SCCDA plan?
17.	88982 (1019)	Sat		AR.IA	3.	AR.IA.METHOD.P	195.452(f)(5) (195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)	Does the process specify assessment methods that are appropriate for the pipeline integrity threats?
18.	88982 (1019)	Sat		AR.IA	4.	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)	Do the records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats?
19.	88982 (1019)	Sat		AR.IA	5.	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))	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)?
20.	88982 (1019)	Sat		AR.IA	6.	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)	Do the records indicate that assessments are implemented as specified in the assessment plan?
21.	88982 (1019)	Sat		AR.IA	7.	AR.IA.REVIEWQUAL.P	195.452(f)(8) (195.452(g), 195.452(h)(2))	Does the process specify qualification requirements for personnel who review and evaluate integrity assessment results and

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
								information analysis?
22.	88982 (1019)	Sat		AR.IA	8.	AR.IA.REVIEWQUAL.R	195.452(l)(1)(ii) (195.452(f)(8), 195.452(g), 195.452(h)(2))	Do the records indicate that personnel who review and evaluate integrity assessment results and information analysis are qualified?
23.	88982 (1019)	Sat		AR.IA	9.	AR.IA.STANDARDS.P	195.452(f)(5) (195.452(b)(6))	Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing integrity assessments?
24.	88982 (1019)	Sat		AR.IA	10.	AR.IA.STANDARDS.R	195.452(l)(1)(ii) (195.452(b)(6))	Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments?
25.	88982 (1019)	Sat		AR.IL	1.	AR.IL.ILIIMPLPERQUAL.P	195.452(f)(5) (195.591)	Does the process identify the qualification requirements for personnel who perform ILI (In Line Inspections)?
26.	88982 (1019)	Sat		AR.IL	2.	AR.IL.ILIIMPLPERQUAL.R	195.591 (195.452(l)(1)(ii), 195.452(f)(5))	Do the records indicate that personnel who perform ILI (In Line Inspections) are qualified and certified (where applicable)?
27.	88982 (1019)	Sat		AR.IL	3.	AR.IL.ILIREVIEWQUAL.P	195.452(f)(8) (195.452(g))	Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis?
28.	88982 (1019)	Sat		AR.IL	4.	AR.IL.ILIREVIEWQUAL.R	195.452(l)(1)(ii) (195.452(f)(8), 195.452(g))	Do the records indicate that personnel who review and evaluate ILI

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
								integrity assessment results and information analysis are qualified?
29.	88982 (1019)	Sat		AR.IL	5.	AR.IL.ILISPECS.P	195.452(f)(5) (195.452(h), 195.452(j), 195.591)	Does the process include adequate ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization?
30.	88982 (1019)	Sat		AR.IL	7.	AR.IL.ILIVALIDATE.P	195.452(f)(4) (195.452(j)(5)(i), 195.452(h), 195.591)	Does the process include the validation of ILI results?
31.	88982 (1019)	Sat		AR.IL	8.	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))	Do the records for validating ILI assessment results indicate that the process was implemented?
32.	88982 (1019)	Sat		AR.IL	9.	AR.IL.ILIINTEGRATION.P	195.452(f)(3) (195.452(g), 195.452(h))	Does the process for evaluating ILI results include integration of all available information about the integrity of the pipeline?
33.	88982 (1019)	Sat		AR.IL	10.	AR.IL.ILIINTEGRATION.R	195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(h))	Do the records indicate that the operator integrated other data/information when evaluating ILI tool data/results?
34.	88982 (1019)	NA		AR.IL	11.	AR.IL.ILIIMPLEMENT.O	195.452(b)(5)	Have the ILI procedures been followed?
35.	88982 (1019)	NA		AR.PTI	1.	AR.PTI.PRESSTESTACCEP.P	195.452(f)(5) (195.304, 195.305, 195.306, 195.308, 195.452(j)(5)(ii))	Does the process define acceptance criteria for a successful pressure test?
36.	88982 (1019)	NA		AR.PTI	2.	AR.PTI.PRESSTESTCORR.P	195.452(f)(3) (195.452(g)(3))	Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
37.	88982 (1019)	NA		AR.PTI	3.	AR.PTI.PRESSTESTRESULT.O	195.452(b)(5) (195.452(c)(1)(i)(b), 195.452(j)(5)(ii), 195.304)	Was the pressure test conducted in accordance with the procedures?
38.	88982 (1019)	NA		AR.PTI	4.	AR.PTI.PRESSTESTRESULT.R	195.310 (195.452(f)(2), 195.452(f)(5), 195.452(c), 195.452(l)(1)(ii))	Do the pressure test records indicate compliance with Part 195, Subpart E?
39.	88982 (1019)	NA		AR.PTI	5.	AR.PTI.PRESSTESTCORR.R	195.452(l)(1)(ii) (195.452(f)(3), 195.452(g)(3))	When pressure testing was used as the integrity assessment method, do the records indicate that the effectiveness of the corrosion control program was documented?
40.	88982 (1019)	NA		AR.OT	1.	AR.OT.OTPLAN.P	195.452(f)(5) (195.452(c)(1)(i)(D), 195.452(j)(5)(iv), 195.416(d))	If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe?
41.	88982 (1019)	NA		AR.OT	2.	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))	Do the records indicate that the Other Technology integrity assessments were performed in accordance with procedures and vendor recommendations?
42.	88982 (1019)	NA		AR.OT	3.	AR.OT.OTPLAN.O	195.452(b)(5) (195.416(d))	Has the process for the use of "Other Technology" been followed?
43.	88982 (1019)	NA		AR.OT	4.	AR.OT.ASSESSMENTREVIEW.P	195.452(f)(8) (195.452(j)(5), 195.416(d))	Does the process specify qualification requirements for personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology?
44.	88982 (1019)	NA		AR.OT	5.	AR.OT.ASSESSMENTREVIEW.R	195.452(l)(1)(ii) (195.452(f)(8), 195.452(j)(5), 195.416(d))	Do the records pertaining to the selected integrity assessments indicate that personnel who

Ro w	Assets	Resul t	(Note¹)	Sub-Group	Qs t #	Question ID	References	Question Text
								review and evaluate the results of an integrity assessment and information analysis using Other Technology are qualified?
45.	88982 (1019)	Sat		AR.RCHCA	1.	AR.RCHCA.DISCOVERY.P	195.452(f)(4) (195.452(h)(2))	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?
46.	88982 (1019)	Sat		AR.RCHCA	2.	AR.RCHCA.IMSCHEDULE.P	195.452(f)(4) (195.452(h)(3), 195.452(h)(4))	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)?
47.	88982 (1019)	NA		AR.RCHCA	4.	AR.RCHCA.DISCOVERY.R	195.452(l)(1)(ii) (195.452(h)(2), 195.452(f)(4))	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?
48.	88982 (1019)	Sat		AR.RCHCA	5.	AR.RCHCA.IMPRC.P	195.452(f)(4) (195.452(h)(1), 195.452(h)(4))	Does the process include criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?
49.	88982 (1019)	Sat		AR.RCHCA	6.	AR.RCHCA.REMEDIATION.R	195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4), 195.452(b)(5), 195.569)	Do records indicate that anomaly remediation and documentation of remediation was performed in accordance with the process?
50.	88982 (1019)	Sat		AR.RCHCA	7.	AR.RCHCA.IMPRC.R	195.452(l)(1)(ii) (195.452(f)(4),	Do records indicate that

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
							195.452(h)(1), 195.452(h)(4))	prompt action was taken to address all anomalous conditions discovered through the integrity assessment or information analysis?
51.	88982 (1019)	NA		AR.RCHCA	8.	AR.RCHCA.REMEDIATION.O	195.452(b)(5) (195.402(a), 195.402(c)(14), 195.422(a), 195.569, 195.589(c))	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?
52.	88982 (1019)	Sat		AR.RCHCA	9.	AR.RCHCA.REMEDIATION.P	195.452(f)(4) (195.452(h)(1), 195.422(b))	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?
53.	88982 (1019)	Sat		AR.RCHCA	10.	AR.RCHCA.PRESSREDUCE.P	195.452(f)(4) (195.428, 195.452(h)(1)(i), 195.452(h)(1)(ii))	Does the process for pressure reduction meet the code requirements?
54.	88982 (1019)	NA		AR.RCHCA	11.	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)	Do the integrity assessment records indicate that the pressure reduction taken was acceptable and promptly implemented?
55.	88982 (1019)	NA		AR.RCHCA	12.	AR.RCHCA.IMSCHEDULE.R	195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4))	Do the records indicate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(4)?
56.	88982 (1019)	Sat		AR.RCHCA	14.	AR.RCHCA.CRACKREMEDIATION.P	195.452(f)(4) (195.452(h), 195.588(c))	If the pipeline is susceptible to cracking, does the process include criteria for remedial actions to address

Ro w	Assets	Resul t	(Note[1])	Sub-Group	Qs t #	Question ID	References	Question Text
								integrity issues raised by the assessment method?
57.	88982 (1019)	Sat		AR.RCHCA	15.	AR.RCHCA.CRACKREMEDIATION.R	195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(4)(iii)(G) , 195.588(c))	If the pipeline is susceptible to cracking, do the records indicate that the remedial actions have been documented?
58.	88982 (1019)	Sat		AR.RMP	1.	AR.RMP.SAFETY.P	195.402(c)(14) (195.422(a), 195.452(h)(1))	Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?
59.	88982 (1019)	NA		AR.RMP	2.	AR.RMP.SAFETY.O	195.422(a) (195.402(c)(14), 195.452(h)(1))	Are repairs made in a safe manner and to prevent injury to persons and/or property damage?
60.	88982 (1019)	Sat		AR.RMP	3.	AR.RMP.METHOD.P	195.402(c)(3) (195.452(h)(1), 195.585)	Does the process identify permissible repair methods for each type of defect?
61.	88982 (1019)	NA		AR.RMP	4.	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))	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?
62.	88982 (1019)	NA		AR.RMP	5.	AR.RMP.REPAIRQUAL.R	195.505(b) (195.507(a), 195.505(c), 195.452(h)(1), 195.452(b)(5))	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?
63.	88982 (1019)	Sat		AR.RMP	6.	AR.RMP.PIPECONDITION.R	195.404(c)(1) (195.404(c)(2), 195.452(l)(1)(ii))	Do the repair records document all the information needed to understand the conditions of the pipe and its environment and also provide the

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
								information needed to support the Integrity Management program, when applicable?
64.	88982 (1019)	NA		AR.RMP	7.	AR.RMP.REPLACESTD.R	195.404(a)(1) (195.422(b),)	Were all replaced line pipe and/or components designed and constructed as required by Part 195?
65.	88982 (1019)	NA		AR.RMP	8.	AR.RMP.PIPEMOVE.R	195.424(a) (195.424(b), 195.424(c))	From a review of selected records, were pipeline movements performed in accordance with 195.424?
66.	88982 (1019)	NA		AR.RMP	9.	AR.RMP.WELDERQUAL.R	195.214(a) (195.214(b), 195.222(a), 195.222(b),)	From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?
67.	88982 (1019)	NA		AR.RMP	10.	AR.RMP.WELDQUAL.R	195.226(a) (195.226(b), 195.226(c), 195.230(a), 195.230(b), 195.230(c),)	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?
68.	88982 (1019)	NA		AR.RMP	11.	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),)	From the review of the results of remediation projects, were new welds inspected and examined in accordance with 195.228 or 195.234?
69.	88982 (1019)	Sat		AR.RMP	12.	AR.RMP.CRACKNDE.P	195.452(f)(4) (195.452(h))	Does the process include appropriate NDE method(s) and other information gathering during the evaluation of cracks and cracking?
70.	88982 (1019)	Sat		AR.RMP	13.	AR.RMP.CRACKNDE.R	195.452(l)(1)(ii) (195.452(f)(4),	Do the records indicate that

Ro w	Assets	Resul t	(Note[1])	Sub-Group	Qs t #	Question ID	References	Question Text
							195.452(h), 195.404(c))	appropriate NDE method(s) were used and other information was gathered related to the evaluation of cracking?
71.	88982 (1019)	Sat	2	TDC.IMFACI L	1.	IM.FACIL.FACILIDENT.P	195.452(f)(1)	Does the program include a written process for identification of facilities that could affect an HCA?
72.	88982 (1019)	Sat	2	TDC.IMFACI L	2.	IM.FACIL.FACILIDENT.R	195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(3))	Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?
73.	88982 (1019)	Sat	2	TDC.IMFACI L	3.	IM.FACIL.RELEASE.P	195.452(f)(1) (195.452(l)(1)(i))	Does the process include methods to determine the facility locations/scenario s and worst case volume of potential commodity releases?
74.	88982 (1019)	Sat	2	TDC.IMFACI L	4.	IM.FACIL.RELEASE.R	195.452(l)(1)(ii)	Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?
75.	88982 (1019)	Sat	2	TDC.IMFACI L	5.	IM.FACIL.SPREAD.P	195.452(f)(1) (195.452(l)(1)(i))	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?
76.	88982 (1019)	Sat	2	TDC.IMFACI L	6.	IM.FACIL.SPREAD.R	195.452(l)(1)(ii)	Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?
77.	88982 (1019)	Sat	2	TDC.IMFACI L	7.	IM.FACIL.PMMPREVENTIVE.P	195.452(f)(6) (195.452(i))	Does the process include

Ro w	Assets	Resul t	(Note¹)	Sub-Group	Qs t #	Question ID	References	Question Text
								requirements for identification of facility preventive measures to protect the HCAs?
78.	88982 (1019)	Sat	2	TDC.IMFACI L	8.	IM.FACIL.PMMPREVENTIVE.R	195.452(l)(1)(ii) (195.452(i)(1))	Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?
79.	88982 (1019)	Sat	2	TDC.IMFACI L	9.	IM.FACIL.PMMMITIGATIVE.P	195.452(f)(6) (195.452(i))	Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?
80.	88982 (1019)	Sat	2	TDC.IMFACI L	10.	IM.FACIL.PMMMITIGATIVE.R	195.452(l)(1)(ii) (195.452(i)(1))	Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?
81.	88982 (1019)	NA	2	TDC.IMFACI L	11.	IM.FACIL.PMMIMPLEMENT.O	195.452(i)(1)	Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?
82.	88982 (1019)	Sat		IM.HC	1.	IM.HC.HCALOCATION.P	195.452(f)(1) (195.452(a), 195.452(d)(3), 195.452(b)(2))	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?
83.	88982 (1019)	Sat		IM.HC	2.	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))	Do records indicate that locations and boundaries of HCA-affecting pipe segments are correctly identified and maintained up-to-date?

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
84.	88982 (1019)	NA	2	IM.HC	3.	IM.HC.HCALOCATION.O	195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2))	Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?
85.	88982 (1019)	Sat		IM.HC	4.	IM.HC.HCAIDENT.P	195.452(f)(1) (195.452(a))	Does the process include all locations where pipeline segments directly intersect a high consequence area?
86.	88982 (1019)	NA		IM.HC	5.	IM.HC.HCAIDENT.R	195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))	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?
87.	88982 (1019)	Sat		IM.HC	6.	IM.HC.HCARELEASE.P	195.452(f)(1) (195.452(a))	Does the process include methods to determine the locations and volume of potential commodity releases?
88.	88982 (1019)	Sat		IM.HC	7.	IM.HC.HCARELEASE.R	195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))	Do records indicate that identified release locations and spill volumes are consistent with the documented process?
89.	88982 (1019)	Sat		IM.HC	8.	IM.HC.HCAOVERLAND.P	195.452(f)(1) (195.452(a))	Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?
90.	88982 (1019)	Sat		IM.HC	9.	IM.HC.HCAOVERLAND.R	195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))	Do records indicate that the analysis of overland spread is consistent with the documented process?

Ro w	Assets	Resul t	(Note¹)	Sub-Group	Qs t #	Question ID	References	Question Text
91.	88982 (1019)	Sat		IM.HC	10.	IM.HC.HCAH2OTRANSP.P	195.452(f)(1) (195.452(a))	Does the process include the analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?
92.	88982 (1019)	Sat		IM.HC	11.	IM.HC.HCAH2OTRANSP.R	195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))	Do records indicate that water transport analysis is consistent with the documented process?
93.	88982 (1019)	NA		IM.HC	12.	IM.HC.HCAAIRDISP.P	195.452(f)(1) (195.452(a))	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?
94.	88982 (1019)	NA		IM.HC	13.	IM.HC.HCAAIRDISP.R	195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))	Do the records indicate that the analysis of air dispersion of vapors is consistent with the documented process?
95.	88982 (1019)	NA		IM.HC	14.	IM.HC.HCAINDIRECT.P	195.452(f)(1) (195.452(a))	Does the process include all locations of pipeline segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?
96.	88982 (1019)	NA		IM.HC	15.	IM.HC.HCAINDIRECT.R	195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))	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?
97.	88982 (1019)	NA		IM.HC	16.	IM.HC.HCACAT3.P	195.452(f)(1) (195.452(b)(2), 195.452(a)(3))	Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?
98.	88982 (1019)	NA		IM.HC	17.	IM.HC.HCACAT3.R	195.452(l)(1)(ii) (195.452(f)(1),	Do records indicate

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
							195.452(b)(2), 195.452(a)(3))	completion of segment identification for Category 3 pipelines prior to beginning of operation?
99.	88982 (1019)	NA		IM.RA	1.	IM.RA.RADATA.O	195.452(b)(5) (195.452(f)(3))	Are field conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?
100.	88982 (1019)	Sat		IM.RA	2.	IM.RA.RADATA.P	195.452(f)(3) (195.452(g), 195.452(j))	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?
101.	88982 (1019)	Sat		IM.RA	3.	IM.RA.RADATA.R	195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))	Do the records indicate that all available information has been integrated into the risk analysis?
102.	88982 (1019)	Sat		IM.RA	4.	IM.RA.RAMETHOD.P	195.452(f)(3) (195.452(g), 195.452(j))	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?
103.	88982 (1019)	Sat		IM.RA	5.	IM.RA.RARESULTS.R	195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))	Do the records indicate that the results of the risk analysis process are useful for drawing conclusions and insights for decision making?
104.	88982 (1019)	Sat		IM.RA	6.	IM.RA.RASEGMENT.P	195.452(f)(3) (195.452(g), 195.452(j))	Does the risk analysis process consider and incorporate the variation in risk factors along the pipeline such that segment-specific risk results and

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
								insights are obtained?
105.	88982 (1019)	Sat		IM.RA	7.	IM.RA.RAMETHOD.R	195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(e))	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?
106.	88982 (1019)	Sat		IM.CA	1.	IM.CA.PERIODICEVAL.P	195.452(f)(5) (195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))	Does the process include requirements for performing periodic evaluations of pipeline integrity?
107.	88982 (1019)	Sat		IM.CA	2.	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))	Do records indicate that evaluations of pipeline integrity are being performed periodically?
108.	88982 (1019)	NA	2	IM.CA	7.	IM.HC.HCALOCATION.O	195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2))	Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?
109.	88982 (1019)	Sat		IM.CA	8.	IM.CA.ASSESSINTERVAL.P	195.452(f)(5) (195.452(e), 195.452(g), 195.452(j)(3))	Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval?
110.	88982 (1019)	Sat		IM.CA	9.	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))	Do the records indicate that the assessment intervals are consistent with the risks identified for the pipe segment and the results of previous assessments?
111.	88982 (1019)	Sat		IM.CA	10.	IM.CA.ASSESSMETHOD.P	195.452(f)(5) (195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)	Does the process specify assessment methods that are appropriate for

Ro w	Assets	Resul t	(Note[1])	Sub-Group	Qs t #	Question ID	References	Question Text
								the specific integrity threats to the pipe segment?
112.	88982 (1019)	Sat		IM.CA	11.	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)	Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment?
113.	88982 (1019)	Sat		IM.CA	12.	IM.CA.ASSESSNOTIFY.P	195.452(f)(5) (195.452(j)(4), 195.452(m))	Does the process include methodology for submitting variance notifications to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?
114.	88982 (1019)	NA		IM.CA	13.	IM.CA.ASSESSNOTIFY.R	195.452(l)(1)(ii) (195.452(f)(5), 195.452(m), 195.452(j)(4))	Do the records indicate that variance notifications been submitted to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?
115.	88982 (1019)	Sat		IM.PM	1.	IM.PM.PMMMEASURES.P	195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section III, API Standard 1160)	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)?
116.	88982 (1019)	Sat		IM.PM	2.	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	Do records demonstrate that the process of identification and evaluation for Preventive &

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
							VI, API Standard 1160)	Mitigative Measures (P&M Measures) has been applied in accordance with the documented process?
117.	88982 (1019)	NA		IM.PM	3.	IM.PM.PMMIMPLEMENT.O	195.452(b)(5) (195.452(i)(1), 195.452(i)(2), 195.452(i)(3), 195.452(i)(4))	Have preventive and mitigative actions been implemented as described in the records?
118.	88982 (1019)	Sat		IM.PM	4.	IM.PM.PMMMITIGATIVE.R	195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))	Do the records indicate that mitigative actions have been considered and implemented?
119.	88982 (1019)	Sat		IM.PM	5.	IM.PM.PMMPREVENTIVE.R	195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))	Do the records indicate that preventive actions have been considered and implemented?
120.	88982 (1019)	Sat		IM.PM	6.	IM.PM.PMMRISKANALYSIS.P	195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section II, API Standard 1160)	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?
121.	88982 (1019)	Sat		IM.PM	7.	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)	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?
122.	88982 (1019)	Sat		IM.PM	8.	IM.PM.IMLEAKDETEVAL.P	195.452(f)(6) (195.452(i)(3), 195 Appendix C, Section III, API Standard 1160)	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?

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
123.	88982 (1019)	Sat		IM.PM	9.	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)	Do records indicate that all required and other relevant leak detection evaluation factors have been evaluated to ensure the protection of HCAs?
124.	88982 (1019)	Sat		IM.PM	10.	IM.PM.PMMEFRD.P	195.452(f)(6) (195.452(i)(4), 195.452(i)(1), 195.452(i)(2), API Standard 1160)	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?
125.	88982 (1019)	Sat		IM.PM	11.	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)	Do the records demonstrate that all required and other relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?
126.	88982 (1019)	Sat	2	IM.FACIL	1.	IM.FACIL.FACILIDENT.P	195.452(f)(1)	Does the program include a written process for identification of facilities that could affect an HCA?
127.	88982 (1019)	Sat	2	IM.FACIL	2.	IM.FACIL.FACILIDENT.R	195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(3))	Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?
128.	88982 (1019)	Sat		IM.FACIL	3.	IM.FACIL.RISKANAL.P	195.452(f)(3) (195.452(g), 195.452(j))	Does the process include approaches to identify and evaluate the risks of facilities that can affect HCAs?
129.	88982 (1019)	Sat		IM.FACIL	4.	IM.FACIL.RISKANAL.R	195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))	Do the records indicate that the analysis of risk of facilities has been

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
								performed as required?
130.	88982 (1019)	Sat	2	IM.FACIL	5.	IM.FACIL.RELEASE.P	195.452(f)(1) (195.452(l)(1)(i))	Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?
131.	88982 (1019)	Sat	2	IM.FACIL	6.	IM.FACIL.RELEASE.R	195.452(l)(1)(ii)	Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?
132.	88982 (1019)	Sat	2	IM.FACIL	7.	IM.FACIL.SPREAD.P	195.452(f)(1) (195.452(l)(1)(i))	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?
133.	88982 (1019)	Sat	2	IM.FACIL	8.	IM.FACIL.SPREAD.R	195.452(l)(1)(ii)	Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?
134.	88982 (1019)	NA		IM.FACIL	9.	IM.FACIL.AIRDISP.P	195.452(f)(1) (195.452(l)(1)(i))	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?
135.	88982 (1019)	NA		IM.FACIL	10.	IM.FACIL.AIRDISP.R	195.452(l)(1)(ii)	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?

Row	Assets	Result	(Note¹)	Sub-Group	Qst #	Question ID	References	Question Text
136.	88982 (1019)	Sat		IM.FACIL	11.	IM.FACIL.PERIODEVAL.P	195.452(f)(5) (195.452(g), 195.452(j)(1), 195.452(j)(2))	Does the process include requirements for performing continual evaluations of facility integrity?
137.	88982 (1019)	Sat		IM.FACIL	12.	IM.FACIL.PERIODEVAL.R	195.452(l)(1)(ii) (195.452(j)(2))	Do the records indicate that periodic evaluations of integrity at facilities affecting HCAs have been performed?
138.	88982 (1019)	Sat	2	IM.FACIL	13.	IM.FACIL.PMMPREVENTIVE.P	195.452(f)(6) (195.452(i))	Does the process include requirements for identification of facility preventive measures to protect the HCAs?
139.	88982 (1019)	Sat	2	IM.FACIL	14.	IM.FACIL.PMMPREVENTIVE.R	195.452(l)(1)(ii) (195.452(i)(1))	Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?
140.	88982 (1019)	Sat	2	IM.FACIL	15.	IM.FACIL.PMMMITIGATIVE.P	195.452(f)(6) (195.452(i))	Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?
141.	88982 (1019)	Sat	2	IM.FACIL	16.	IM.FACIL.PMMMITIGATIVE.R	195.452(l)(1)(ii) (195.452(i)(1))	Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?
142.	88982 (1019)	NA	2	IM.FACIL	17.	IM.FACIL.PMMIMPLEMENT.O	195.452(i)(1)	Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?
143.	88982 (1019)	Sat		IM.QA	1.	IM.QA.IMPERFEFECTIVE.P	195.452(f)(7) (195.452(k))	Does the process for evaluating IM program effectiveness include the elements necessary to conduct a

Ro w	Assets	Resul t	(Note¹)	Sub-Group	Qs t #	Question ID	References	Question Text
								meaningful evaluation?
144.	88982 (1019)	Sat		IM.QA	2.	IM.QA.IMPERFEFECTIVE.R	195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))	Do the records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?
145.	88982 (1019)	Sat		IM.QA	3.	IM.QA.RECORDS.P	195.402(c)(3) (195.452(l)(1))	Does the process ensure that the records required for the integrity management program are maintained?
146.	88982 (1019)	Sat		IM.QA	4.	IM.QA.IMPERFMETRIC.P	195.452(f)(7) (195.452(k))	Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?
147.	88982 (1019)	Sat		IM.QA	5.	IM.QA.IMPERFMETRIC.R	195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))	Do the records indicate that performance metrics are providing meaningful insight into integrity management program performance?
148.	88982 (1019)	Sat		IM.QA	6.	IM.QA.RECORDS.R	195.452(l)(1)(ii)	Do the records indicate that the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity?
149.	88982 (1019)	Sat		RPT.NR	3.	RPT.NR.NOTIFYIMP.P	195.452(f)(5) (195.452(j)(4), 195.452(h)(1), 195.452(m))	Does the process include a requirement for submitting an IMP notification for each of the following circumstances: A) Unable to Meet Remediation Deadlines, B)

Row	Assets	Result	(Note[1])	Sub-Group	Qst #	Question ID	References	Question Text
								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)?
150.	88982 (1019)	NA		RPT.NR	4.	RPT.NR.NOTIFYIMP.R	195.452(l)(1)(ii) (195.452(m), 195.452(j)(4), 195.452(h)(1), 195.452(c)(1))	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)?
151.	88982 (1019)	Sat		RPT.RR	2.	RPT.RR.ANNUALREPORTIMINSPECT.R	195.49	Do the records indicate that the Annual Report Part F Data is complete and accurate?
152.	88982 (1019)	Sat		RPT.RR	3.	RPT.RR.ANNUALREPORTIMASSESS.R	195.49	Is Annual Report Part G data complete and accurate?

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

Report Parameters: All non-empty Results

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