

Inspection Output (IOR)

Generated on 2022.June.27 16:04

Report Filters

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

Results Unsat,Concern

Inspection Information

Inspection Name	Nouryon Section 114 Checklist	Operator(s)	NOURYON PULP AND PERFORMANCE CHEMICALS LLC (32358)	Plan Submitted	03/21/2022
Status	PLANNED	Lead	Scott Anderson	Plan Approval	03/22/2022 by Scott Rukke
Start Year	2022	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Darren Tinnerstet	All Activity Start	04/21/2022
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	04/21/2022
Protocol Set ID	GT.2022.02	Supervisor	Scott Rukke	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This is a Nouryon Pulp & Performance Chemicals, PIPES Act of 2020 Section 114 inspection. Nouryon O&M Section 7.15 covers fugitive emissions.

SYSTEM DESCRIPTION

Commodity: Hydrogen Gas

Pipe Type: PE3408 HDPE, SDR 11

Pipe Size: 8"

MAOP: 30psig

Length: 0.5 miles

Class Location: 1

Facilities visited and Total AFOD

This inspection was done remotely

Primary Operator contacts and/or participants

Stephen Hernandez, Principal Consultant, Everline Consultants

Operator executive contact and mailing address for any official correspondence

Jacob St. Mary

HSES Manager

2701 Road N NE

Moses Lake, WA 98837

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	86235 (1852)	NOURYON PULP & PERFORMANCE CHEMICALS LLC	unit	86235	--	24	24	24	24	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.	86235 (1852)	--	114	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	Inspected	Total	Required % Complete
1.	114 questions	--	04/21/2022	04/21/2022	--	114	all assets	all types	24	24	24	24	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	114 questions 1	COMPLETED	05/02/2022	114 questions	86235 (1852)

Results (Unsat, Concern values, 0 results)

This inspection has no matching 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.

Inspection Results (IRR)

Generated on 2022.June.27 16:03

• 86235 (1852) (58)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
1.	86235 (1852)	NIC	3	114.GT	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
2.	86235 (1852)	NA	3	114.GT	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
3.	86235 (1852)	NA	3	114.GT	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
4.	86235 (1852)	NA	3	114.GT	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
5.	86235 (1852)	NA	3	114.GT	5. 114.114.COMPRESSOR.P	49 U.S.C. 60108(a)	Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?
6.	86235 (1852)	NA	3	114.GT	6. 114.114.DRIVERENGINE.P	49 U.S.C. 60108(a)	Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?
7.	86235 (1852)	Sat	2	114.GT	7. 114.114.LKRLSID.P	49 U.S.C. 60108(a)	Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?
8.	86235 (1852)	NA	3	114.GT	8. 114.114.LKRLSVENT.P	49 U.S.C. 60108(a)	Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
9.	86235 (1852)	NA	3	114.GT	9. 114.114.LKRLSUNEXPCTVENT.P	49 U.S.C. 60108(a)	Do procedures provide for investigation of any unanticipated vented

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							releases of natural gas, and if so, what are the associated actions?
10.	86235 (1852)	NA	3	114.GT	10. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
11.	86235 (1852)	NA		114.GT	11. 114.114.LKRLSDETECTLK.P	49 U.S.C. 60108(a)	Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?
12.	86235 (1852)	NA		114.GT	12. 114.114.LKMITGRPRREPAIR.P	49 U.S.C. 60108(a)	Do procedures provide alternatives to cutouts (to reduce emissions)?
13.	86235 (1852)	NA	2	114.GT	13. 114.114.TESTESD.P	49 U.S.C. 60108(a)	Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?
14.	86235 (1852)	NA	3	114.GT	14. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
15.	86235 (1852)	NA	2	114.GT	15. 114.114.FLARE.P	49 U.S.C. 60108(a)	Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
16.	86235 (1852)	NA	3	114.GT	16. 114.114.GNLDGNCNCFG.P	49 U.S.C. 60108(a)	Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
17.	86235 (1852)	NA	2	114.GT	17. 114.114.GNLCMPSTATION.P	49 U.S.C. 60108(a)	Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							(i.e., beyond compressor/driver-specific procedures)?
18.	86235 (1852)	NA	3	114.GT	18. 114.LEAKPRONE.LKRLS.P	49 U.S.C. 60108(a)	What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
19.	86235 (1852)	NA	3	114.GT	19. 114.LEAKPRONE.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
20.	86235 (1852)	NA	3	114.GT	20. 114.LEAKPRONE.LKMITGRPREXAMPLE.P	49 U.S.C. 60108(a)	Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
21.	86235 (1852)	NA	3	114.GT	21. 114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a)	Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?
22.	86235 (1852)	NIC	3	114.UNGS	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
23.	86235 (1852)	NA	3	114.UNGS	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
24.	86235 (1852)	NA	3	114.UNGS	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
25.	86235 (1852)	NA	3	114.UNGS	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
26.	86235 (1852)	NA	3	114.UNGS	5. 114.114.COMPRESSOR.P	49 U.S.C. 60108(a)	Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?
27.	86235 (1852)	NA	3	114.UNGS	6. 114.114.DRIVERENGINE.P	49 U.S.C. 60108(a)	Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?
28.	86235 (1852)	NA	3	114.UNGS	7. 114.114.LKRLSVENT.P	49 U.S.C. 60108(a)	Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
29.	86235 (1852)	NA	3	114.UNGS	8. 114.114.LKRLSUNEXPCTVENT.P	49 U.S.C. 60108(a)	Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?
30.	86235 (1852)	NA	3	114.UNGS	9. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
31.	86235 (1852)	NA		114.UNGS	10. 114.114.LKRLSWELLHD.P	49 U.S.C. 60108(a)	Do procedures provide for periodic leakage surveys around the wellhead?
32.	86235 (1852)	NA		114.UNGS	11. 114.114.LKRLSANN.P	49 U.S.C. 60108(a)	Do procedures provide for periodic checking of wellhead annuluses for indications of leaks (e.g., unexplained pressure variations)?
33.	86235 (1852)	NA		114.UNGS	12. 114.114.LKRLSFIELD.P	49 U.S.C. 60108(a)	Do procedures provide for leak surveys for well casing containment or geologic issues?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
34.	86235 (1852)	NA	3	114.UNGS	13.	114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a) Do relief valve testing procedures include measures to minimize natural gas releases?
35.	86235 (1852)	NA	3	114.UNGS	14.	114.114.GNLDSGNCNFG.P	49 U.S.C. 60108(a) Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
36.	86235 (1852)	NA	3	114.UNGS	15.	114.LEAKPRONE.LKRLS.P	49 U.S.C. 60108(a) What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
37.	86235 (1852)	NA	3	114.UNGS	16.	114.LEAKPRONE.LKRLSLKDATA.P	49 U.S.C. 60108(a) Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
38.	86235 (1852)	NA	3	114.UNGS	17.	114.LEAKPRONE.LKMITGRPREXAMPLE.P	49 U.S.C. 60108(a) Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
39.	86235 (1852)	NA	3	114.UNGS	18.	114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a) Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?
40.	86235 (1852)	NIC	3	114.GGBOOST	1.	SRN.114.INSPECTCVRG.S	What are your assets comprised of?
41.	86235 (1852)	NA	3	114.GGBOOST	2.	SRN.114.GASTRANSPORT.S	Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
42.	86235 (1852)	NA	3	114.GGBOOST	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
43.	86235 (1852)	NA	3	114.GGBOOST	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
44.	86235 (1852)	NA	3	114.GGBOOST	5. 114.114.COMPRESSOR.P	49 U.S.C. 60108(a)	Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?
45.	86235 (1852)	NA	3	114.GGBOOST	6. 114.114.DRIVERENGINE.P	49 U.S.C. 60108(a)	Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?
46.	86235 (1852)	Sat	2	114.GGBOOST	7. 114.114.LKRLSID.P	49 U.S.C. 60108(a)	Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?
47.	86235 (1852)	NA	3	114.GGBOOST	8. 114.114.LKRLSVENT.P	49 U.S.C. 60108(a)	Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
48.	86235 (1852)	NA	3	114.GGBOOST	9. 114.114.LKRLSUNEXPTVENT.P	49 U.S.C. 60108(a)	Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?
49.	86235 (1852)	NA	3	114.GGBOOST	10. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
50.	86235 (1852)	NA	2	114.GGBOOST	11. 114.114.TESTESD.P	49 U.S.C. 60108(a)	Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?
51.	86235 (1852)	NA	3	114.GGBOOST	12. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
52.	86235 (1852)	NA	2	114.GGBOOST	13. 114.114.FLARE.P	49 U.S.C. 60108(a)	Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
53.	86235 (1852)	NA	3	114.GGBOOST	14. 114.114.GNLDSGNCNFG.P	49 U.S.C. 60108(a)	Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
54.	86235 (1852)	NA	2	114.GGBOOST	15. 114.114.GNLCMPSTATION.P	49 U.S.C. 60108(a)	Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?
55.	86235 (1852)	NA	3	114.GGBOOST	16. 114.LEAKPRONE.LKRLS.P	49 U.S.C. 60108(a)	What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
56.	86235 (1852)	NA	3	114.GGBOOST	17. 114.LEAKPRONE.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
57.	86235 (1852)	NA	3	114.GGBOOST	18. 114.LEAKPRONE.LKMITGRPREXAMPLE.P	49 U.S.C. 60108(a)	Do procedures identify cast iron,

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
58.	86235 (1852)	NA	3	114.GGBOOST	19.	114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a) Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?

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.