

Inspection Output (IOR)

Generated on 2023.October.09 10:22

Report Filters

Assets **Inland Empire / 86256 (92)**

Results **All**

Inspection Information

Inspection Name	[8589] 11Sep23 Inland Empire OQ	Operator(s)	INLAND EMPIRE PAPER CO (8140) Lead Lex Vinsel	Plan Submitted	08/24/2023
Status	PLANNED	Observer(s)	David Cullom, Anthony Dorrough, Derek Norwood, Scott Anderson, Tom Green	Plan Approval	09/19/2023 by Dennis Ritter
Start Year	2023	Supervisor	Dennis Ritter	All Activity Start	09/12/2023
System Type	GT	Director	Scott Rukke	All Activity End	09/13/2023
Protocol Set ID	WA.GT.2022.02			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

2023 Operator Qualification Inspection for Inland Empire Paper Company (IEP)

Facilities visited and Total AFOD

Inland Empire Paper Company (IEP)

3320 N. Argonne

Millwood WA

AFOD 2

Summary of Significant Findings
(DO NOT Discuss Enforcement options)

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Primary Operator contacts and/or participants

Kevin Davis

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Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 86256 (92)	Inland Empire	unit	86256	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe Abandoned CDA AMAOP	51	51	51	51	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.	86256 (92)	--	TQ	P, R, O	Detail	--

Plan Implementations

#	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Require d	Inspected	Total	Require d % Complete
1.	IEP OQ Procedures and Records	--	09/12/2023	09/13/2023	--	all planned questions	all assets	P, R, O	51	51	51	51	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".

3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	IEP OQ Procedures and Records	COMPLETED	10/09/2023	IEP OQ Procedures and Records	86256 (92)

Results (all values, 51 results)

TQ.PROT9: OQ Protocol 9

1. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**
Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
2. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))**
Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*
Assets Covered **86256 (92)**
Result Notes **Reviewed company procedures.**
3. Question Result, ID, References **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**
Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*
Assets Covered **86256 (92)**
Result Notes **Reviewed qualifications of operator personnel.**
4. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**
Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*
Assets Covered **86256 (92)**
Result Notes **Operators were aware of AOC's.**
5. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**
Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*
Assets Covered **86256 (92)**
Result Notes **Reviewed qualification records for Kevin Davis and David Hill.**

TQ.OQ: Operator Qualification

6. Question Result, ID, References **Sat, TQ.OQ.OQPLAN.P, 192.805(a) (192.801(b))**
Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*
Assets Covered **86256 (92)**
Result Notes **Reviewed Revision 11, Aug 23. Operator will have a new revision after this inspection.**
7. Question Result, ID, References **Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)**
Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*

Assets Covered 86256 (92)
Result Notes Sections 4.3.3 & 4.5.1

8. Question Result, ID, References Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)

Question Text *Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?*

Assets Covered 86256 (92)
Result Notes Section 4.4 Use of Non-Qualified individuals.

9. Question Result, ID, References Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))

Question Text *Are evaluation methods established and documented appropriate to each covered task?*

Assets Covered 86256 (92)
Result Notes Section 4.2 - Evaluation Methods

10. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 86256 (92)
Result Notes Reviewed Gary Douglas AMPP (NACE) CP4 - Cathodic Protection Certified Specialist. Cert.No. 5432

AMPP - The Association for Materials Protection and Performance Recognizes

11. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 86256 (92)
Result Notes Reviewed record of individual training for Brent Bledsoe and Robert Scott. Training held 25Jul23 - 26Jul23. Reviewed skills and records.

12. Question Result, ID, References Sat, TQ.OQ.TRAINING.P, 192.805(h)

Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered 86256 (92)
Result Notes Section 4.3 Types of Evaluation/Qualification & Section 4.5 Re Evaluation.

13. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*

Assets Covered 86256 (92)
Result Notes Reviewed record of individual training for Brent Bledsoe and Robert Scott. Training held 25Jul23 - 26Jul23. Reviewed skills and records.

No Re-Evaluation has been required.

14. Question Result, ID, References Sat, TQ.OQ.OQPLANCONTRACTOR.P, 192.805(b) (192.805(f), 192.805(c))

Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*

Assets Covered 86256 (92)
Result Notes Section 6 - Contractors

Inland Empire Paper has one contractor for CP that follows the OQ plan.

Additional contractors would be OQed as required.

15. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.P, 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))**
 Question Text *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*
 Assets Covered **86256 (92)**
 Result Notes **Section 6 - Contractors**
- Inland Empire Paper has one contractor for CP that follows the OQ plan.**
- Additional contractors would be OQed as required.**
16. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)**
 Question Text *Does the OQ plan document that the operator has assured that the processes on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*
 Assets Covered **86256 (92)**
 Result Notes **Section 6 - Contractors**
- Inland Empire Paper has one contractor for CP that follows the OQ plan.**
- Additional contractors would be OQed as required.**
17. Question Result, ID, References **NA, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)**
 Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*
 Assets Covered **86256 (92)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
18. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.P, 192.803**
 Question Text *Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*
 Assets Covered **86256 (92)**
 Result Notes **Section 2.0 - Definition**
- Section 4 - Evaluation/Qualification Process and Methods**
- Section 4.1 - General - First and Second Paragraph**
- Section 4.2 - Evaluation Methods 4th bullet**
19. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)**
 Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*
 Assets Covered **86256 (92)**
 Result Notes **Reviewed Shutdown Operator Qualifications Quiz for Brent Bldsoe.**
- Reviewed AOC review on test. - Test appears adequate.**
20. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.O, 192.803**
 Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*
 Assets Covered **86256 (92)**
 Result Notes **Reviewed AOC's with operator.**
21. Question Result, ID, References **Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))**

Question Text *Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?*

Assets Covered 86256 (92)

Result Notes Section 4.5.2 - Performance Contribution to an Incident

Section 4.5.3 - Review Process

22. Question Result, ID, References NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))

Question Text *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*

Assets Covered 86256 (92)

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

23. Question Result, ID, References Sat, TQ.OQ.OQPLAN.O, 192.805(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability?*

Assets Covered 86256 (92)

Result Notes Operator personnel appear to have adequate skills, knowledge, and ability.

24. Question Result, ID, References Sat, TQ.OQ.MOC.P, 192.805(f)

Question Text *Does the OQ program identify how changes to processes, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*

Assets Covered 86256 (92)

Result Notes 4.6 - Management of change

25. Question Result, ID, References Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i) (192.18)

Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*

Assets Covered 86256 (92)

Result Notes Section 8. Notification of Significant Plan Changes

26. Question Result, ID, References Sat, TQ.OQ.CHANGERECD.R, 192.805(i) (192.805(f), 192.18)

Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*

Assets Covered 86256 (92)

Result Notes IEP OQ Appendix B

Operator Qualification Program Changes for IEP

Reviewed Management of Change Log - No issues

TQ.QU: Qualification of Personnel - Specific Requirements

27. Question Result, ID, References Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))

Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*

Assets Covered 86256 (92)

Result Notes Contractor performing "Cathodic protection" surveys for IEP will be accepted as being a "qualified individual" if they have proper documentation of certification for cathodic protection through the "National Association of Corrosion Engineers" NACE And/or AMPP (The Association for Materials Protection and Performance).

28. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 86256 (92)
Result Notes Reviewed qualification of Gary Douglas

29. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))

Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*

Assets Covered 86256 (92)

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

30. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.R, 192.627 (192.807(a), 192.807(b))

Question Text *Do records indicate the qualification of personnel performing hot taps?*

Assets Covered 86256 (92)

Result Notes IEP does no hot taps.

31. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.O, 192.627 (192.805(h))

Question Text *Do personnel performing hot taps demonstrate adequate skills and knowledge?*

Assets Covered 86256 (92)

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

IEP does no hot taps

32. Question Result, ID, References Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-06-01, 192.801, 192.328)

Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*

Assets Covered 86256 (92)

Result Notes Section 6 - Contractors

33. Question Result, ID, References NA, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-06-01, 192.801, 192.328)

Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*

Assets Covered 86256 (92)

Result Notes No excavations have occurred during the time period.

34. Question Result, ID, References NA, TQ.QU.EXCAVATE.O, 192.805(b) (192.805(h), ADB-06-01, 192.801(a), 192.328(a), 192.328(c))

Question Text *Do individuals who oversee marking, trenching, and backfilling operations demonstrate adequate skills and knowledge?*

Assets Covered 86256 (92)

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

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

35. Question Result, ID, References NA, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b), 192.493)

Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*

Assets Covered 86256 (92)

Result Notes IEPs gas line is not in an HCA

36. Question Result, ID, References NA, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d), 192.493)

Question Text *Do records indicate adequate qualification of integrity management personnel?*

Assets Covered 86256 (92)

Result Notes IEPs gas line is not in an HCA

37. Question Result, ID, **NA**, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i),
References 192.907(b), 192.911(l))
Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*
Assets Covered 86256 (92)
Result Notes IEPs gas line is not in an HCA

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

38. Question Result, ID, **Sat**, TQ.QUOMCONST.INSPECTOR.P, 192.241(a) (192.241(c), 192.805(b), 192.328(a), 192.328(b))
References
Question Text *Does the process require welding inspection personnel to be adequately trained and qualified?*
Assets Covered 86256 (92)
Result Notes OQ manual Section 6 - Contractors

and O&M Sections 6.06 Welding
39. Question Result, ID, **NA**, TQ.QUOMCONST.INSPECTOR.R, 192.241(a) (192.241(c), 192.807(a), 192.807(b))
References
Question Text *Do records indicate adequate qualification documentation for personnel who conduct welding inspections?*
Assets Covered 86256 (92)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
40. Question Result, ID, **NA**, TQ.QUOMCONST.INSPECTOR.O, 192.241(a) (192.241(c))
References
Question Text *Does the welding inspector demonstrate adequate skills and knowledge?*
Assets Covered 86256 (92)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
41. Question Result, ID, **NA**, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))
References
Question Text *Do records indicate the qualification of nondestructive testing personnel?*
Assets Covered 86256 (92)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
42. Question Result, ID, **NA**, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c),
References 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))
Question Text *Do records indicate that welders are adequately qualified?*
Assets Covered 86256 (92)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
43. Question Result, ID, **Sat**, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b),
References 192.805(b))
Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*
Assets Covered 86256 (92)
Result Notes OQ Section Contractors & O&M Section 3.05 Welding, API 1104.
44. Question Result, ID, **NA**, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))
References
Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*
Assets Covered 86256 (92)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
45. Question Result, ID, **NA**, TQ.QUOMCONST.WELDER.O, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c),
References 192.229(d), 192.803, 192.328(a), 192.328(b))
Question Text *Do welders demonstrate adequate skills and knowledge?*

Assets Covered 86256 (92)

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

46. Question Result, ID, References Sat, TQ.QUOMCONST.NDT.P, 192.243(b)(2) (192.803, 192.805(b), 192.805(h), 192.328(a), 192.328(b))

Question Text *Does the process require nondestructive testing of welds to be performed by personnel who are trained and qualified in the established procedures and with the testing equipment employed?*

Assets Covered 86256 (92)

Result Notes O&M 6.06.4.14 Non-Destructive Testing

47. Question Result, ID, References NA, TQ.QUOMCONST.NDT.O, 192.243(b)(2) (192.803, 192.328(a), 192.328(b))

Question Text *Do nondestructive testing personnel demonstrate adequate skills and knowledge?*

Assets Covered 86256 (92)

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

TQ.TR: Training of Personnel

48. Question Result, ID, References Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))

Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*

Assets Covered 86256 (92)

Result Notes O&M Section 3.13 Training Program

ERM Section 11.0 Emergency Exercises

49. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text *Is training for emergency response personnel documented?*

Assets Covered 86256 (92)

Result Notes Reviewed records of ERM review done by Kevin Davis.

List of content items and who was in each session.

50. Question Result, ID, References NA, TQ.TR.TRAINING.O, 192.615(b)(2) (192.805(b))

Question Text *Do emergency response personnel demonstrate adequate skills and knowledge?*

Assets Covered 86256 (92)

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

51. Question Result, ID, References Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)

Question Text *Does the process require review of emergency response personnel performance?*

Assets Covered 86256 (92)

Result Notes ERM Section 11.0 - Emergency Response and equipment exercises

Reviewed Kevin Davis evaluation for the the response of a fake incident.

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