

# Inspection Output (IOR)

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## Report Filters

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

Results All

## Inspection Information

Inspection Name	8618_Olympic Laterals	Operator(s)	OLYMPIC PIPE LINE COMPANY (30781) Lead Dennis Ritter	Plan Submitted	09/06/2023
Status	PLANNED	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, John Trier, Tom Green	Plan Approval	09/12/2023 by Scott Rukke
Start Year	2023	Director	Scott Rukke	All Activity Start	09/11/2023
System Type	HL			All Activity End	09/22/2023
Protocol Set ID	WA.HL.2022.02			Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

Intrastate laterals: these include the Seattle lateral (12" line, 12.83 miles long), SeaTac lateral (12" line, 5.54 miles long), Tacoma lateral (8" line, 3.72 miles long), Olympia lateral (6" line, 14.9 miles long), and Vancouver lateral (12" line, 4.4 miles long). The Olympia lateral has been out-of-service since early 2009. The 6" pipeline was purged and filled with nitrogen gas at 13 psig pressure. A section of the Olympia lateral was removed for construction of a new road at approximately MP 12.2 88th Ave in Tumwater.

The inspection will use the Core and UTC WA liquid operator question sets. The laterals contain 3 breakout or surge tanks-Tank 102 Seattld DF, Tank 103 Tacoma DF, Tank 107 Vancouver DF.

### Facilities visited and Total AFOD

Renton and Olympia Stations

Seattle DF

Seatac DF (did not enter)

Tacoma DF, Tacoma Junction

Vancouver DF, Vancouver Junction  
4 AFODs

4 non field days

### Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were two cathodic protection issues found during field recon, both at Vancouver DF. The operator has repaired both of these issues, as noted below.

1) Station was not isolated from the Vancouver lateral pipeline-The operator installed a bond across the isolation kit which ties the pipeline to the facility and removes the need for isolation. (see photo in attachments).

2) West side of tank bottom read on Tank 107 did not meet operator cathodic protection criteria--Operator took new natives and all meet -850 mV with IR taken into account or 100 mV shift (see attachments for new native reads).

### Primary Operator contacts and/or participants

Jim Bruen,

Jim Fraley

### Operator executive contact and mailing address for any official correspondence

Gerald Maret

VP, US Pipelines & Logistics

British Petroleum - North America

M. C. 95 305 Wacker Drive

Chicago Illinois 60606  
gerald.maret@bp.com

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88987 (1690)	Olympic Pipe Line - Intrastate Laterals	unit	88987	Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress	191	191	191	191	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.	88987 (1690)	Core, WUTC Standard Inspection	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, 114, GENERIC	P, R, O, S	Detail --

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Records and Field	--	09/11/2023	--		all planned questions	all assets	all types	191	191	191	191	100.0%
			09/22/2023										

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	Records	COMPLETED	12/12/2023	Records and Field	88987 (1690)
2.	Attendance List	Records and Field 1	COMPLETED	12/12/2023	Records and Field	88987 (1690)
3.	Breakout Tanks	Records and Field	COMPLETED	12/12/2023	Records and Field	88987 (1690)

## Results (all values, 191 results)

218 (instead of 191) results are listed due to re-presentation of questions in more than one sub-group.

### AR.IA: Integrity Assessments

- Question Result, ID, Sat, AR.IA.ASSESSCHEDULE.R, 195.452(l)(1)(ii) (195.452(b)(5), 195.452(c), 195.452(d), References 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 88987 (1690)  
 Result Notes Reviewed assessment timeline document showing the following
  - Renton to SeaTac-last run 11/21/19 due by 11/21/24
  - Renton to Seattle-last 1/7/19 due by 11/7/24
  - Tacoma junction to Tacoma DF-last run 12/8/19 due by 12/8/24
  - Vancouver junction to Vancouver-DF last run 11/15/19 due by 11/15/24

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

- Question Result, ID, NA, 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), References 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 88987 (1690)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. No ILI tools run on laterals since last inspection.

### AR.RCHCA: Repair Criteria (HCA)

- Question Result, ID, Sat, AR.RCHCA.IMSCHEDULE.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4))  
 References  
 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 88987 (1690)  
 Result Notes Reviewed Evaluation Summary and Repair Project Basis dated 4/13/2020 UT tool (first time)
  - Renton station to Seattle DF
  - Renton Station to Sea Tac DF
  - Immediate conditions none
  - 60-d conditions none
  - 180-d conditions 1 repair due date Oct 6, 2020--metal loss with seamweld at 7:43 clock position, external 50% metal loss. Dig date Sept 28, 2020, repaired 10/9/2020. Inside a casing, casing spacer removed coating caused corrosion.
  - 18 month conditions none
  - Tacoma Junction to Tacoma DF UT tool (first time)

ILI run Dec 8-9, 2019

Final Repair plan Apr 3, 2020

Immediate conditions-none

60-d conditions-none

180-d conditions-1, deadline for inspection Sept 30, 2020; 50% metal loss external; repair is recoat

Vancouver junction to Vancouver DF Tool run November 15, 2019. 1 Dig date 9 Aug 2021, Repair date 8/10/2021

immediate conditions-none

60-d conditions-none

180-d conditions-none

18 month conditions-1 external metal loss, corrosion--2 anomalies 1 reported as 26% actual was 13%; second was reported at 13% actual is 22.5%--repair is a recoat

## AR.RMP: Repair Methods and Practices

4. Question Result, ID, Sat, AR.RMP.METHOD.R, 195.404(c)(1) (195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1),  
References 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 88987 (1690)

Result Notes Reviewed USPL DRW-015-005, Exhibit 1 Repair and Inspection report

Renton station to Seattle DF

Renton Station to Sea Tac DF

180-d conditions 1 repair due date Oct 6, 2020--metal loss with seamweld at 7:43 clock position, external 50% metal loss. Dig date Sept 28, 2020, repaired 10/9/2020 per BP OM&ER 195.422. Inside a casing, casing spacer removed coating caused corrosion.

Installed new clockspring and new casing, casing vent and CP test points

Sta 113+03 to 113+15

OQ'd personnel-

Hanging H:

Covered tasks 32,39--Bernie Yost

32, 39,7.4,7.5,7.7--Justin Johnson

7.5,7.7,32,39,40.3-- Dave Walker

32,39,7.2,7.4,7.5--Colby Tyra

32,39--Kelly Cameron

Applus:

1.1,5.1,5.2,5.3,8.1,8.2,8.3,38.6,38.7-Ken Gula

Tacoma Junction to Tacoma DF UT tool (first time)

ILI run Dec 8-9, 2019

Final Repair plan Apr 3, 2020

Immediate conditions-none

60-d conditions-none

180-d conditions-1, deadline for inspection Sept 30, 2020; 50% metal loss external; repair is recoat with Denso 7200 epoxy

OQ'd personnel-

Hanging H:

Covered tasks 32,39--Bernie Yost

32, 39,7.4,7.5,7.7--Justin Johnson

32,39,7.2,7.5--Kyoel Meeker

Applus:

1.1,5.1,5.2,5.3,8.1,8.2,8.3,38.6,38.7-Ken Gula

Vancouver junction to Vancouver DF Tool run November 15, 2019. 1 Dig date 9 Aug 2021, Repair date 8/10/2021

immediate conditions-none

60-d conditions-none

180-d conditions-none

18 month 1 external metal loss, corrosion--2 anomalies 1 reported as 26% actual was 13%; second was reported at 13% actual is 22.5%--repair is a recoat

OQ'd personnel-

Hanging H:

Covered tasks 32,39--Bernie Yost

32, 39,7.4,7.5,7.7--Justin Johnson

32,39,7.2,7.5--Kyle Meeker

Applus:

1.1,5.1,5.2,5.3,8.1,8.2,8.3,38.6,38.7-Nathaniel Henderson

5. Question Result, ID, References Sat, 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 88987 (1690)

Result Notes Reviewed USPL DRW-015-005, Exhibit 1 Repair and Inspection report

Renton station to Seattle DF

Renton Station to Sea Tac DF

180-d conditions 1 repair due date Oct 6, 2020--metal loss with seamweld at 7:43 clock position, external 50% metal loss. Dig date Sept 28, 2020, repaired 10/9/2020 per BP OM&ER 195.422. Inside a casing, casing spacer removed coating caused corrosion.

Installed new clockspring and new casing, casing vent and CP test points

Sta 113+03 to 113+15

OQ'd personnel-

Hanging H:

Covered tasks 32,39--Bernie Yost

32, 39,7.4,7.5,7.7--Justin Johnson

7.5,7.7,32,39,40.3-- Dave Walker

32,39,7.2,7.4,7.5--Colby Tyra

32,39--Kelly Cameron

Applus:

1.1,5.1,5.2,5.3,8.1,8.2,8.3,38.6,38.7--Ken Gula

Tacoma Junction to Tacoma DF UT tool (first time)

ILI run Dec 8-9, 2019

Final Repair plan Apr 3, 2020

Immediate conditions-none

60-d conditions-none

180-d conditions-1, deadline for inspection Sept 30, 2020; 50% metal loss external; repair is recoat with Denso 7200 epoxy

OQ'd personnel-

Hanging H:

Covered tasks 32,39--Bernie Yost

32, 39,7.4,7.5,7.7--Justin Johnson

32,39,7.2,7.5--Kyoel Meeker

Applus:

1.1,5.1,5.2,5.3,8.1,8.2,8.3,38.6,38.7-Ken Gula

Vancouver junction to Vancouver DF Tool run November 15, 2019. 1 Dig date 9 Aug 2021, Repair date 8/10/2021

immediate conditions-none

60-d conditions-none

180-d conditions-none

18 month 1 external metal loss, corrosion--2 anomalies 1 reported as 26% actual was 13%; second was reported at 13% actual is 22.5%--repair is a recoat

OQ'd personnel-

Hanging H:

Covered tasks 32,39--Bernie Yost

32, 39,7.4,7.5,7.7--Justin Johnson

32,39,7.2,7.5--Kyle Meeker

Applus:

1.1,5.1,5.2,5.3,8.1,8.2,8.3,38.6,38.7-Nathaniel Henderson

6. 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 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No replaced pipe or components.

## CR.CRMRR: Roles and Responsibilities

7. Question Result, ID, References NA, CR.CRMRR.PRESSLIMITS.O, 195.446(b)(2)

Question Text *Are controllers aware of the current MOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MOP?*

Assets Covered 88987 (1690)

Result Notes No such activity/condition was observed during the inspection. Did not observe controllers on this inspection.

## CR.LD: Leak Detection (Non-CPM)

8. Question Result, ID, References NA, CR.LD.EVAL.R, 195.444(a) (195.444(b), 195.134(a), 195.134(b),)

Question Text *Do records show that the operator evaluated the capability of its leak detection system to protect the public, property, and the environment and modified as necessary?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPL operates a CPM leak detection system. It was last inspected in 2020 and meets API 1130 criteria.

9. Question Result, ID, References NA, CR.LD.LDSYSTEM.R, 195.404(c) (195.134(b), 195.444(b))

Question Text *Do records demonstrate the operator's leak detection system is performing within the system design requirements?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPL operates a CPM leak detection system. It was last inspected in 2020 and meets API 1130 criteria.

10. Question Result, ID, References NA, CR.LD.LDTRAINING.R, 195.507(a) (195.507(b))

Question Text *Do records show that pipeline controllers are trained to recognize leaks using the chosen leak detection method/system?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPL operates a CPM leak detection system. It was last inspected in 2020 and meets API 1130 criteria.

11. Question Result, ID, References NA, CR.LD.LDTRAINING.O, 195.505

Question Text *Are the Pipeline Controllers trained to recognize leaks?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPL operates a CPM leak detection system. It was last inspected in 2020 and meets API 1130 criteria.

12. Question Result, ID, References NA, CR.LD.ALARMDISPLAY.O, 195.444(b)

Question Text *Are the Leak Detection alarms adequate?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPL operates a CPM leak detection system. It was last inspected in 2020 and meets API 1130 criteria.

13. Question Result, ID, References NA, CR.LD.LDSTEST.R, 195.134(b) (195.444(b))

Question Text *Have leak detection system testing records and results been retained/available and indicate adequate results?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPL operates a CPM leak detection system. It was last inspected in 2020 and meets API 1130 criteria.

14. Question Result, ID, References NA, CR.LD.LDSINSTRUMENT.R, 195.444(b) (195.446(j))

Question Text *Do records indicate the calibration of field instrumentation used in the leak detection system was performed?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPL operates a CPM leak detection system. It was last inspected in 2020 and meets API 1130 criteria.

## DC.CO: Construction

15. Question Result, ID, References NA, DC.CO.ASMECONSTRUCTION.R,

Question Text *Do records indicate that new pipelines are designed and constructed in accordance with ASME B31.4?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

16. Question Result, ID, References Sat, DC.CO.VALVEPROTECT.O, 195.258(a)

Question Text *Are valves accessible to authorized employees and protected from damage or tampering?*

Assets Covered 88987 (1690)

Result Notes No new construction, but all valves were secured in a locked enclosure and the valves were chained and locked.

17. Question Result, ID, References Sat, DC.CO.VALVELOCATION.R, 195.266(f) (195.260(a), 195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))

Question Text *Do records indicate that valves are located as specified by 195.260?*

Assets Covered 88987 (1690)



Result Notes All laterals were installed prior to 1970. No new construction has occurred triggering the installation of new valves. Valves are currently located at the junction of each lateral, in/out of breakout tanks and to meet valve spacing requirements on transmission lines.

18. Question Result, ID, References Sat, DC.CO.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))

Question Text *Are valves located as specified by 195.260?*

Assets Covered 88987 (1690)

Result Notes No new construction. Noted valves at

inlet/outlet of breakout tanks Tanks 102, 103, 107

at river crossings: Duwamish, Green

at takeoff from mainline (laterals): Renton Station, Tacoma Junction, Olympia Station, Vancouver Junction

19. Question Result, ID, References Sat, DC.CO.RECORDS.R, 195.266(a) (195.266(b), 195.266(c), 195.266(d), 195.266(e), 195.266(f))

Question Text *Do records indicate that construction records are being maintained for the life of each pipeline?*

Assets Covered 88987 (1690)

Result Notes Reviewed hydro test for Renton to Seattle DF from 8/27/1965 conducted by Pacific Pipeline Construction Company.

67,744 feet of 12" 0.281 wall tested to 2070 psi 24 hr test. This is 110% of maximum operating pressure. 110% of 1877 psi. MODP is 1440.

## DC.COCMP: Construction - Pump Stations

20. Question Result, ID, References Sat, DC.COCMP.VALVEPROTECT.O, 195.258(a)

Question Text *Are valves accessible to authorized employees and protected from damage or tampering?*

Assets Covered 88987 (1690)

Result Notes No new construction, but all valves were secured in a locked enclosure and the valves were chained and locked.

21. Question Result, ID, References Sat, DC.COCMP.VALVELOCATION.R, 195.266(f) (195.260(a), 195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))

Question Text *Do records indicate that valves are located as specified by 195.260?*

Assets Covered 88987 (1690)

Result Notes No new construction, but all valves were secured in a locked enclosure and the valves were chained and locked. Noted valves at inlet and outlet of breakout tanks, lateral take-offs, river crossings. Seattle lateral had BVs at mileage points

Vancouver Lateral V1003 Vancouver DF

Seatac Lateral Green River BV

Seattle Lateral Henderson St BV

Seattle Lateral 6th and Charleston BV

22. Question Result, ID, References Sat, DC.COCMP.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))

Question Text *Are valves located as specified by 195.260?*

Assets Covered 88987 (1690)

Result Notes No new construction, but all valves were secured in a locked enclosure and the valves were chained and locked. Noted valves at inlet and outlet of breakout tanks, lateral take-offs, river crossings. Seattle lateral had BVs at mileage points

Vancouver Lateral V1003 Vancouver DF

Seatac Lateral Green River BV

Seattle Lateral Henderson St BV

Seattle Lateral 6th and Charleston BV

23. Question Result, ID, References **NA, DC.COCMP.PMPVENTILATE.O, 195.262(a)**  
Question Text *Is adequate ventilation provided in pump station buildings to prevent the accumulation of hazardous vapors?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**  
  
**Mainline pumps provide motive force for laterals.**
24. Question Result, ID, References **NA, DC.COCMP.PMPVAPOR.O, 195.262(a)**  
Question Text *Do pumping station buildings have devices to warn of the presence of hazardous vapors?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**  
  
**Mainline pumps provide motive force for laterals.**
25. Question Result, ID, References **NA, DC.COCMP.PMPOVERPRESS.O, 195.262(b)**  
Question Text *Do pumping stations have overpressure safety devices and emergency shutdown capability?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Mainline pumps provide motive force for laterals.**
26. Question Result, ID, References **NA, DC.COCMP.PMPPROPERTY.R,**  
Question Text *Do records indicate that pump stations are designed, sited, and constructed consistent with the requirements in WAC 480-75-380?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
27. Question Result, ID, References **NA, DC.COCMP.PMPPROPERTY.O, 195.262(d)**  
Question Text *Is pumping equipment installed on property that is under the control of the operator and at least 15.2 m (50 ft) from the boundary of the pump station?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Mainline pumps provide motive force for laterals.**
28. Question Result, ID, References **NA, DC.COCMP.PMPFIREPROT.O, 195.262(e)**  
Question Text *Is fire protection installed at each pump station?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Mainline pumps provide motive force for laterals.**

## DC.WELDINSPI: Construction Weld Inspection

29. Question Result, ID, References **NA, DC.WELDINSPI.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234)** (also presented in: References **TDC.WELDINSPI**)  
Question Text *Do records indicate welds are inspected to ensure compliance with the requirements of 195.228?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

30. Question Result, ID, **NA, DC.WELDINSP.WELDINSPECT.O, 195.228(a) (195.228(b), 195.234)** (also presented in: References **TDC.WELDINSP**)  
 Question Text *Are welds being inspected to ensure compliance with the requirements of 195.228?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
31. Question Result, ID, **NA, DC.WELDINSP.WELDNDT.R, 195.234(a) (195.234(b), 195.234(c))** (also presented in: References **TDC.WELDINSP**)  
 Question Text *Do records indicate adequate nondestructive testing and determination of standards of acceptability?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
32. Question Result, ID, **NA, DC.WELDINSP.WELDNDT.O, 195.234(a) (195.234(b), 195.234(c))** (also presented in: References **TDC.WELDINSP**)  
 Question Text *Are NDT activities performed in accordance with approved processes?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
33. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDT.R, 195.234(d) (195.266(a))** (also presented in: **TDC.WELDINSP**)  
 Question Text *Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
34. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a))** (also presented in: **TDC.WELDINSP**)  
 Question Text *Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
35. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a))** (also presented in: **TDC.WELDINSP**)  
 Question Text *Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
36. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a))** (also presented in: **TDC.WELDINSP**)  
 Question Text *Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **DC.WELDERQUAL: Construction Welder Qualification**

37. Question Result, ID, References **NA, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME Boiler & Pressure Vessel Code Section IX)** (also presented in: **TDC.WELDERQUAL**)  
 Question Text *Do records indicate that welders are qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **DC.WELDPROCEDURE: Construction Welding Procedures**

38. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b)** (also presented in: **TDC.WELDPROCEDURE**)

Question Text *Do records indicate welding procedures and qualifying tests recorded in detail?*

Assets Covered 88987 (1690)

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

## DC.DN: Design

39. Question Result, ID, References NA, DC.DN.VALVE.O, 195.116(f) (195.116(b), 195.116(c), 195.116(e))

Question Text *Do pipeline system valves meet the requirements of 195.116?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No new valves in system. Existing valves had appropriate name, rating and size on valve body.

40. Question Result, ID, References Sat, DC.DN.LDDESIGN.R, 195.134(a) (195.134(b), 195.134(c), 195.444(a), 195.444(b), 195.444(c))

Question Text *Do records indicate evaluation of the leak detection system for its capability to protect the public, property, and the environment?*

Assets Covered 88987 (1690)

Result Notes August 26, 2023 pig run refilling pig receiver 10 bbls, caused leak alarm to go off. Flowing 76,000bbls/hr. Much less than 8%. OPL has not conducted an actual test since 1998 as they have many operational incidents which allow for "testing".

41. Question Result, ID, References NA, DC.DN.LDDESIGN.O, 195.134(b) (195.134(c), 195.444(b), 195.444(c))

Question Text *Does the leak detection system perform to the system design requirements?*

Assets Covered 88987 (1690)

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

## DC.MO: Maintenance and Operations

42. Question Result, ID, References Sat, DC.MO.SAFETY.O, 195.422(a) (195.402(c)(14))

Question Text *Are pipeline maintenance construction and testing activities performed safely and in accordance with procedures to prevent damage to persons and property?*

Assets Covered 88987 (1690)

Result Notes Did not see any construction. All operator techs performed OQ tasks in a safe manner per procedures ie checked rectifier box for voltage prior to touching, called control room prior to operating valve, checked for bees prior to opening rectifier, valve controllers, etc.

43. Question Result, ID, References NA, DC.MO.MOVE.R,

Question Text *Do records indicate that a study was prepared before moving or lowering a hazardous liquid pipeline?*

Assets Covered 88987 (1690)

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

44. Question Result, ID, References NA, DC.MO.MOVE.O, 195.424(a) (195.424(b), 195.424(c))

Question Text *Does the operator perform pipeline movements in accordance with 195.424?*

Assets Covered 88987 (1690)

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

## DC.PT: Pressure Testing

45. Question Result, ID, References Sat, DC.PT.PRESSTEST.R, 195.310 (195.305(b))

Question Text *Are pressure test records available and adequate?*

Assets Covered 88987 (1690)

Result Notes Reviewed hydro test for Renton to Seattle DF from 8/27/1965.

67,744 feet of 12" 0.281 wall tested to 2070 psi 24 hr test. This is 110% of maximum operating pressure. 110% of 1877 psi. MODP is 1440.

46. Question Result, ID, NA, DC.PT.PRESSTEST.O, 195.302(a) (195.304, 195.305(a), 195.305(b), 195.306(a), 195.306(b),  
References 195.306(c), 195.306(d), 195.307(a), 195.307(b), 195.307(c), 195.307(d), 195.307(e), 195.308)  
Question Text *Is pressure testing being adequately conducted?*  
Assets Covered 88987 (1690)  
Result Notes No such activity/condition was observed during the inspection.
47. Question Result, ID, NA, DC.PT.PRESSTESTTIEIN.R, 195.308  
References  
Question Text *Do records indicate pipe associated with tie-ins has been pressure tested?*  
Assets Covered 88987 (1690)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
48. Question Result, ID, NA, DC.PT.PRESSTESTRPT.R,  
References  
Question Text *Do records indicate the operator filed a report with the commission at least 45 days prior to pressure testing when increasing the MOP of the pipeline?*  
Assets Covered 88987 (1690)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

## DC.TQOQ: Training and Qualification (OQ)

49. Question Result, ID, NA, DC.TQOQ.OQCONTRACTOR.R, 195.505(b) (Operators OQ program manual)  
References  
Question Text *Are qualification records for contractor personnel maintained?*  
Assets Covered 88987 (1690)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
50. Question Result, ID, NA, DC.TQOQ.OQCONTRACTOR.O, 195.505(b) (Operators OQ program manual)  
References  
Question Text *Do selected contractor individuals performing covered tasks demonstrate adequate skills and knowledge?*  
Assets Covered 88987 (1690)  
Result Notes No such activity/condition was observed during the inspection.
51. Question Result, ID, Sat, DC.TQOQ.RECORDS.R, 195.505(b) (Operators OQ program manual)  
References  
Question Text *Does the operator maintain qualification records for operator personnel?*  
Assets Covered 88987 (1690)  
Result Notes Monthly Tank inspections
- Tank 107 12/2022 to 1/2020 Brian Duran Nov 12, 2023 (3 year)
- Tank 102 12/2022 to 1/2020 John Lazzarini Sept 07, 2025, Aug 2022
- Tank 103 12/2022 to 1/2020 Darnell Richardson Feb 02, 2026, Feb 2023
- Patrolling
- Seatac-Spencer Rogerson, Derek Martin, Mark Skodje 1/2020 to 6/2020?
- Tacoma-Spencer Rogerson, Derek Martin 1/2020-6/2020?
- Gary Gomez Right of Way Surveillance 16 May 22 16 May 19
- Steve Kynaston 28 June 22 28 June 19

Derek Martin 16May22 16 May 19

Spencer Rogerson 15May22 15May19

Dean Christenson 3Jul22 3Jul19

Olympia-Steven Kynaston, Frederick Byerly, Dean Christenson 1/2020-4/2020?

Vancouver-Dean Christenson, Brian Duran, Steven Kynaston 1/2020-9/2020

52. Question Result, ID, References Sat, DC.TQOQ.OQPLAN.O, 195.505(b) (Operators OQ program manual)  
Question Text *Do selected operator individuals performing covered tasks demonstrate adequate skills and knowledge?*  
Assets Covered 88987 (1690)  
Result Notes Gerald Wismer-CP Reads, Rectifier inspection, test for isolation, Atmospheric Corrosion Inspection  
  
Brain Duran-operate valves, test tank level alarms, ROW patrol  
  
Jeffrey Peltzer-operate valves, ROW patrol
53. Question Result, ID, References NA, DC.TQOQ.EXCAVATE.R, 195.505(b) (ADB-06-01)  
Question Text *Do records demonstrate individuals who oversee marking, trenching and backfilling operations are qualified?*  
Assets Covered 88987 (1690)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
54. Question Result, ID, References NA, DC.TQOQ.EXCAVATE.O, 195.505(b) (ADB-06-01)  
Question Text *Do selected individuals who oversee marking, trenching and backfilling operations demonstrate adequate skills and knowledge?*  
Assets Covered 88987 (1690)  
Result Notes No such activity/condition was observed during the inspection.

## TDC.650REGS: New API 650 Tanks - Part 195 Requirements

55. Question Result, ID, References NA, TDC.650REGS.TANKSPEC.R, 195.132(b)(3) (API Std 650)  
Question Text *Do the design records and drawings indicate new aboveground atmospheric breakout tanks are designed and constructed to the specifications required by 195.132(b)(3)?*  
Assets Covered 88987 (1690)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
56. Question Result, ID, References NA, TDC.650REGS.REPAIRSPEC.R, 195.205(b)(1) (API Std 650, API Std 653)  
Question Text *Do records indicate breakout tanks were repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?*  
Assets Covered 88987 (1690)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
57. Question Result, ID, References NA, TDC.650REGS.CPDESIGN.O, 195.565 (195.563(d), API RP 651, Section 6.3.4, API RP 651, Section 6.3.5, API RP 651, Section 7.2.1)  
Question Text *Do field observations confirm new breakout tanks have cathodic protection installed in accordance with 195.565?*  
Assets Covered 88987 (1690)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
58. Question Result, ID, References Sat, TDC.650REGS.OVERFILLPROT.R, 195.428(c) (195.404(a), 195.404(b), 195.404(c), 195.132(b)(3), API Std 2350, Section 4.6, API Std 2350, Section 4.8)  
Question Text *Do records indicate product level alarm devices were installed and set to alarm at a level above the normal and overflow protection levels in accordance with 195.428(c)?*

Assets Covered 88987 (1690)

Result Notes Tanks were not constructed after Oct 2000 but do have overfill protection devices installed at normal and overfill levels.

59. Question Result, ID, Sat, TDC.650REGS.OVERFILLPROT.O, 195.428(c) (195.132(b)(3), API Std 2350, Section 4.6, API Std References 2350, Section 4.8)

Question Text *Do field observations confirm product level alarm devices were installed and set to alarm at the design levels (level above the normal and overfill protection levels) in accordance with 195.428(c)?*

Assets Covered 88987 (1690)

Result Notes Product overfill alarms are set at Hi and HI HI levels. HI HI is an independent alarm.

Checked HI, HI HI alarms on Tank 107 Vancouver DF OK

60. Question Result, ID, References Sat, TDC.650REGS.FIREEQUIP.O, 195.430(a) (195.430(b), 195.430(c))

Question Text *Do field observations confirm the necessary firefighting equipment to respond to emergencies is included at the facility's breakout tank area?*

Assets Covered 88987 (1690)

Result Notes Fire extinguishers and foam equipment at all DFs and junctions as well as stations.

## EP.ERL: Emergency Response Liquids

61. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 88987 (1690)

Result Notes This question was covered during the OPL mainline integrated inspection conducted by PHMSA CRO October 2023.

62. Question Result, ID, References NA, EP.ERL.NOTICES.R, 195.402(a) (195.402(e)(1))

Question Text *Do records indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures?*

Assets Covered 88987 (1690)

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

63. Question Result, ID, References NA, EP.ERL.AUTHORITIES.R, 195.402(a) (195.402(e)(7))

Question Text *Do records indicate that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLs)?*

Assets Covered 88987 (1690)

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

64. Question Result, ID, References NA, EP.ERL.POSTEVTREVIEW.R, 195.402(a) (195.402(e)(7), 195.402(e)(9))

Question Text *Do records indicate post-accident reviews of employee activities were performed to determine whether the procedures were effective in each emergency and take corrective action where deficiencies are found?*

Assets Covered 88987 (1690)

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

65. Question Result, ID, References NA, EP.ERL.COMMSYS.R, 195.408(b)

Question Text *Do records indicate emergency communication system(s) use was as required?*

Assets Covered 88987 (1690)

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

## EP.ETR: Emergency Training of Personnel

66. Question Result, ID, References **Sat, EP.ETR.TRAINING.R, 195.403(a)**  
 Question Text *Do records indicate the operator provided training to its emergency response personnel as required?*  
 Assets Covered **88987 (1690)**  
 Result Notes **This question was covered during the OPL mainline integrated inspection conducted by PHMS CRO October 2023. Reviewed training records with status for 2020, 2021 and 2022 for ERP. By contractual agreements, contractors are trained.**
67. Question Result, ID, References **Sat, EP.ETR.TRAININGREVIEW.R, 195.403(b)**  
 Question Text *Have annual reviews of the emergency response training program been conducted and appropriate changes made as necessary to ensure it is effective?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Reviewed records for 2021, 2022 and 2023. Asked for clarification regarding "did not review" -- all sections were reviewed, however only certain sections were "deep dived" into for review and updated.**
68. Question Result, ID, References **Sat, EP.ETR.TRAININGSUPERVISE.R, 195.403(c)**  
 Question Text *Do records indicate verification that supervisors are knowledgeable of emergency response procedures for which they are responsible?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Hazwoper 12 month refresher**
- Jeff Berry 28 Aug 20, 22 Sept 21**
- Dustin Lambert 10 Sep 20, 10 Sept 21**
- Joseph Paquette 15 Jan 21, 15 Jan 22**
- Nicholas Becker 16 May 22**
- Brian Suits 8 June 22**
69. Question Result, ID, References **NA, EP.ETR.TRAININGSUPERVISE.O, 195.403(c)**  
 Question Text *Do emergency response supervisors demonstrate adequate skills and knowledge?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such activity/condition was observed during the inspection.**

## **FS.TSAPIINSPECT: Tanks and Storage - Inspection**

70. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOINSPECTION.R, 195.404(c)(3) (195.432(a))**  
 Question Text *Do records document that breakout tanks that are not steel atmospheric or low pressure tanks or HVL steel tanks built according to API 2510 have been inspected at the proper interval and that deficiencies found during inspections have been corrected?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
71. Question Result, ID, References **Sat, FS.TSAPIINSPECT.BOINSRVCINSP.R, 195.404(c)(3) (195.432(b))**  
 Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received routine in-service inspections at the required intervals and that deficiencies found during inspections have been documented?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Tank 107 12/2022 to 1/2020 Brian Duran Nov 12, 2023 (3 year)**
- Tank 102 12/2022 to 1/2020 John Lazzarini Sept 07, 2025, Aug 2022**
- Tank 103 12/2022 to 1/2020 Darnell Richardson Feb 02, 2026, Feb 2023**



72. Question Result, ID, References **Sat, FS.TSAPIINSPECT.BOEXTINSP.R, 195.404(c)(3) (195.432(b))**  
 Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received external inspections at the required intervals and that deficiencies documented during inspections have been corrected within a reasonable time frame?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Tank 103 Tacoma Lateral**  
  
**Mistras Alec Arpino 10/8/2020**  
  
**No A or B recommendations. Several C and D recommendations.**  
  
**Tank 107 Vancouver**  
  
**Mistras Alec Arpino 10/6/2020**  
  
**No A or B recommendations. Several C recommendations.**
73. Question Result, ID, References **Sat, FS.TSAPIINSPECT.BOEXTUTINSP.R, 195.404(c)(3) (195.432(b))**  
 Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received ultrasonic thickness inspections at the required intervals and that deficiencies found during inspections have been documented?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Tank 103 Tacoma Lateral**  
  
**Mistras Alec Arpino 10/8/2020**  
  
**No A or B recommendations. Several C and D recommendations.**  
  
**Tank 107 Vancouver**  
  
**Mistras Alec Arpino 10/6/2020**  
  
**No A or B recommendations. Several C recommendations.**
74. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOINTINSP.R, 195.404(c)(3) (195.432(b))**  
 Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received formal internal inspections at the required intervals and that deficiencies found during inspections have been documented?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**  
  
**Seattle 2015**  
  
**Tacoma 2006**  
  
**Vancouver 2016**
75. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOEXTINSPAPI2510.R, 195.404(c)(3) (195.432(c))**  
 Question Text *Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 have received visual external inspections at the required intervals and that deficiencies found have been corrected?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
76. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOINTINSPAPI2510.R, 195.404(c)(3) (195.432(c))**

Question Text *Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 received internal inspections at the required intervals and that deficiencies found have been corrected?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## FS.FG: Facilities General

77. Question Result, ID, References Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: PD.SN)

Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*

Assets Covered 88987 (1690)

Result Notes Fenced Enclosures with padlocked gates. Signage, lighting: Renton Station, Olympia Station, Seattle DF, Seatac DF, Tacoma Junction and DF, Vancouver Junction and DF

78. Question Result, ID, References Sat, FS.FG.IGNITION.O, 195.438 (also presented in: PD.SN)

Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*

Assets Covered 88987 (1690)

Result Notes Signage on fencing around Block valves

Renton, Olympia, Tacoma stations,

Seattle Tacoma and Vancouver DFs

Tacoma and Vancouver junctions,

breakout tanks 102, 103 and 107 are located inside a fenced facility.

79. Question Result, ID, References Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: PD.SN)

Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*

Assets Covered 88987 (1690)

Result Notes Observed Operator signs with correct phone number to control room at Olympia and Renton stations; Seattle, Tacoma and Vancouver DFs, Tacoma and Vancouver Junctions, valves.

80. Question Result, ID, References Sat, FS.FG.FIREPROT.R, 195.404(c)(3) (195.430(a), 195.430(b), 195.430(c))

Question Text *Are records of inspections of firefighting equipment adequate?*

Assets Covered 88987 (1690)

Result Notes Seattle 2020-2022

Tacoma 2020-2022

Vancouver 2020-2022

81. Question Result, ID, References Sat, FS.FG.FIREPROT.O, 195.430(a) (195.430(b), 195.430(c), 195.262(e))

Question Text *Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly?*

Assets Covered 88987 (1690)

Result Notes Fire extinguishers and foam equipment at all DFs and junctions as well as stations. Checked all fire extinguisher records and random checks at DFs, stations, and junctions.

82. Question Result, ID, References NA, FS.FG.PSFIREPROTPWR.O, 195.262(e)

Question Text *Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## FS.PS: Pump Stations

83. Question Result, ID, References **NA, FS.PS.VENTILATION.O, 195.262(a)**  
Question Text *Has adequate ventilation been provided at pump station buildings?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
84. Question Result, ID, References **NA, FS.PS.VAPORALARM.O, 195.262(a)**  
Question Text *Have warning devices that warn of the presence of hazardous vapors been installed at pump station buildings?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
85. Question Result, ID, References **Sat, FS.PS.PSESD.O, 195.262(b)**  
Question Text *Has a device for activating emergency shutdown of the pump station been installed?*  
Assets Covered **88987 (1690)**  
Result Notes **ESDs noted at DFs, junctions and Stations.**
86. Question Result, ID, References **Sat, FS.PS.PSAUXPWR.O, 195.262(b)**  
Question Text *If power is needed to actuate safety devices, has an auxiliary power supply been provided?*  
Assets Covered **88987 (1690)**  
Result Notes **The ESDs have the PLC USB backup in a power outage. The signal would still initiate the alarm but no valves would close due to the lack of power. When power is restored if the station has not been reset the valves would then take the station lock out position until a station reset has taken place.**
87. Question Result, ID, References **NA, FS.PS.PSLOCATION.O, 195.262(d)**  
Question Text *Has on-shore pumping equipment been installed on property under the control of the operator and is that equipment at least 50 feet from the boundary of that property?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## FS.TS: Tanks and Storage

88. Question Result, ID, References **Sat, FS.TS.OVERFILLBO.R, 195.404(c)(3) (195.428(a), 195.428(c), 195.428(d))**  
Question Text *Do records document the inspection and testing of overfill protection devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*  
Assets Covered **88987 (1690)**  
Result Notes **Reviewed Tank 102, 103 and 107 semi annual inspections.**  
  
**April and October of each year or May and November for Tank 107**
89. Question Result, ID, References **Sat, FS.TS.OVERFILLBO.O, 195.428(c)**  
Question Text *Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*  
Assets Covered **88987 (1690)**  
Result Notes **Checked Hi level alarm at Vancouver DF. NOTE none of the tanks are new, constructed or significantly altered after October 2, 2000.**
90. Question Result, ID, References **Sat, FS.TS.BOINSPECTION.O, 195.432(a) (195.432(b), 195.432(c), 195.401(b))** (also presented in: References **FS.TSAPIINSPECT**)  
Question Text *Is the condition of steel atmospheric or low pressure tanks acceptable?*

Assets Covered 88987 (1690)

Result Notes Visually inspected Tanks for corrosion, bottom chime seal, stair condition, water around tank, dents/scrapes, hold downs, railings, signage, valves, level indicator, venting.

102 Seattle

103 Tacoma

107 Vancouver

91. Question Result, ID, References Sat, FS.TS.IGNITIONBO.R, 195.404(c) (195.405(a))

Question Text *Do records indicate protection against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities of aboveground breakout tanks?*

Assets Covered 88987 (1690)

Result Notes Tank 107 12/2022 to 1/2020 Brian Duran Nov 12, 2023 (3 year)

Tank 102 12/2022 to 1/2020 John Lazzarini Sept 07, 2025, Aug 2022

Tank 103 12/2022 to 1/2020 Darnell Richardson Feb 02, 2026, Feb 2023

92. Question Result, ID, References NA, FS.TS.FLOATINGROOF.R, 195.404(c) (195.405(b))

Question Text *Do records indicate access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance, or repair activities of in-service tanks is performed consistent with API Publication 2026?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

93. Question Result, ID, References NA, FS.TS.IMPOUNDBO.R, 195.404(c) (195.264(b))

Question Text *If a breakout tank first went into service after October 2, 2000 do records indicate it has an adequate impoundment?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

94. Question Result, ID, References NA, FS.TS.IMPOUNDBO.O, 195.264(b)

Question Text *If a breakout tank first went into service after October 2, 2000 does it have an adequate impoundment?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

95. Question Result, ID, References NA, FS.TS.VENTBO.R, 195.404(c) (195.264(d))

Question Text *Do records indicate that normal/emergency relief venting and pressure/vacuum-relieving devices installed on aboveground breakout tanks after October 2, 2000 are adequate?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

96. Question Result, ID, References NA, FS.TS.PRESSTESTBO.R, 195.310(a) (195.310(b), 195.307)

Question Text *Have aboveground breakout tanks been pressure tested to their corresponding API or ASME Standard or Specification and do pressure test records contain the required information?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## IM.PM: Preventive and Mitigative Measures

97. 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 88987 (1690)

Result Notes Reviewed Pipeline Integrity Management Review document for 2019-2020

Renton to Seattle DF-Deficiencies develop geohazard procedures for seismic, landslides and karst/subsidence. To be completed by end of 2020.

Renton to Seatac DF-Deficiencies develop geohazard procedures for seismic, landslides and karst/subsidence. To be completed by end of 2020.

Tacoma to Tacoma DF-Deficiencies develop geohazard procedures for seismic, landslides and karst/subsidence. To be completed by end of 2020.

Vancouver to Vancouver DF-Deficiencies develop geohazard procedures for seismic, landslides and karst/subsidence. To be completed by end of 2020.

## MO.LO: Liquid Pipeline Operations

98. Question Result, ID, References Sat, MO.LO.OMMANUALREVIEW.R, 195.402(a)

Question Text *Do records indicate annual reviews of the written procedures in the manual were conducted as required?*

Assets Covered 88987 (1690)

Result Notes Reviewed O&M revision log for 2020, 2021 and 2022. Annual review starts in April of each year.

99. Question Result, ID, References Sat, MO.LO.OMHISTORY.R, 195.404(a) (195.404(c), 195.9, 195.402(c)(1))

Question Text *Do records indicate current maps and records of the pipeline system are maintained and made available as necessary?*

Assets Covered 88987 (1690)

Result Notes Trailblazer is mapping system for most of BP. PODs is brought into Trailblazer GIS.

100. Question Result, ID, References NA, MO.LO.ABANDON.R, 195.402(a) (195.402(c)(10), 195.59)

Question Text *Do records indicate that pipeline segments and facilities were abandoned in accordance with requirements?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

101. Question Result, ID, References Sat, MO.LO.OMEFFECTREVIEW.R, 195.402(a) (195.402(c)(13), 195.404(a))

Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and corrective action taken where deficiencies are found?*

Assets Covered 88987 (1690)

Result Notes Reviewed 2022 Work Procedures Survey completed annually. Survey results are incorporated into OQ program and in conjunction with OMER depending on complexity.

## MO.LMOPP: Liquid Pipeline Overpressure Protection

102. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: FS.PS)

Question Text *Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?*

Assets Covered 88987 (1690)

Result Notes Thermal RVs for 2020-2022 (annual)

Seattle DF

Vancouver DF

SeatacDF

Tacoma DF

Relief Valves

Seatac DF

Seattle DF

Vancouver DF

TAcoma DF

## MO.LOMOP: Liquid Pipeline MOP

103. Question Result, ID, References Sat, MO.LOMOP.MOPDETERMINE.R, 195.402(c)(3) (195.406(a), 195.406(b), 195.302(b), 195.302(c))

Question Text *Do records indicate the maximum operating pressure was established in accordance with 195.406?*

Assets Covered 88987 (1690)

Result Notes Vancouver MODP 720 High High 792

Tacoma MODP 720 792

Seattle 720 792

Seatac 720 792

## MO.LMOPP: Liquid Pipeline Overpressure Protection

104. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: FS.PS)

Question Text *Are inspections of overpressure safety devices adequate (including HVL lines)?*

Assets Covered 88987 (1690)

Result Notes Checked thermal and surge relief overpressure devices at Renton, Olympia Stations; Seattle, Tacoma and Vancouver DFs.

No pump stations on laterals.

105. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426 (also presented in: FS.PS)

Question Text *Are launchers and receivers equipped with relief devices?*

Assets Covered 88987 (1690)

Result Notes Relief devices noted at Renton and Olympia Stations; Seattle Tacoma and Vancouver DF and Tacoma and Vancouver junctions

106. Question Result, ID, References Sat, MO.LMOPP.SURGEANALYSIS.R,

Question Text *Do records indicate that a surge analysis was completed to ensure that the surge pressure does not exceed one hundred ten percent of the MOP?*

Assets Covered 88987 (1690)

Result Notes Reviewed the following

Surge Study for the OPL "Return to 100% MODP", Detailed Report (Final) by Advantica, April 20, 2007.

Study used worst case scenerio for maximum pressure surge (ie 100% DRA, long spool down time for pumps, etc).

Study indicated a reduction of 50 psig at Castlerock and Olympia going into Portland and Linnton station to prevent exceedance of MODP. This was implemented, however, a RV was installed in Portland which allowed for the MODP to go back to the original discharge pressures of 1291 psig Olympia and 1393 psig Castlerock.

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

107. Question Result, ID, References **Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b))** (also presented in: PD.RW)

Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*

Assets Covered **88987 (1690)**

Result Notes **Reviewed patrolling records for the following laterals: 2020-12/2022**

The Vancouver, Olympia, and Tacoma laterals are flown as well as driven.

They are driven weekly because the Damage Prevention Team member is already out there, but also so don't have to worry if the pilot makes it up or not'

Seattle-Spencer Rogerson, Derek Martin, Mark Skodje 1/2020-5/2020? Field Maps application started in 5/2020. Previous patrols are paper.

6/5/2020 Renton to Seattle Delivery Ground patrol-all marked "no". If "yes" will generate an email to team lead and person doing patrol.

8/12/21 Renton to Seattle

Seatac-Spencer Rogerson, Derek Martin, Mark Skodje 1/2020 to 6/2020?

Tacoma-Spencer Rogerson, Derek Martin 1/2020-6/2020?

Olympia-Steven Kynaston, Frederick Byerly, Dean Christenson 1/2020-4/2020?

Vancouver-Dean Christenson, Brian Duran, Steven Kynaston 1/2020-9/2020

108. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 195.412(a)** (also presented in: PD.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered **88987 (1690)**

Result Notes **Mile markers are clearly visible. OK for driving and aerial patrols.**

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

109. Question Result, ID, References **Sat, MO.ABNORMAL.ABNORMAL.R, 195.404(b) (195.402(d)(1))**

Question Text *Do records indicate operator's personnel responded to indications of abnormal operations as required by the written procedures?*

Assets Covered **88987 (1690)**

Result Notes **P195.402(d) Abnormal Operations**

Event which exceeds design limits:

A. Unintended valve closure

B. Unintended station shut down

C. Comm failure

- D. SCADA failure
- E. Flow pressure deviations outside normal limits
- F. Operations of a safety device-
- G. HI HI tank alarms

WO 8481165 VAN DF Van inlet failed to open V1002 6/11/22

WO8363837 VAN DF receiver inlet failed to open V1002 2/24/22

WO8190071 VAN DF Tank 107 HI level 8/25/21-tank full needed to remove product.

WO8504954 TAC DF High pressure alarm 191 psi at meter PT 1003 7/8/22

WO8592539 TAC DF High downstream pressure PSV 750 9/16/22-Blown fuse on surge valve alarm

WO8448948 VAN DF High downstream pressure surge alarm 5/2/2022 set at 200 reached 207psi

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

110. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: PD.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 88987 (1690)

Result Notes Observed line markers along ROW. No issues note.

## MO.LM: Liquid Pipeline Maintenance

111. Question Result, ID, References Sat, MO.LM.VALVEMAIN.T.R, 195.404(c) (195.420(a), 195.420(b)) (also presented in: FS.VA)

Question Text *Do records indicate each mainline valve was inspected as required?*

Assets Covered 88987 (1690)

Result Notes Reviewed Work Order records indicating bi-annual inspections of valves:

Vancouver Lateral Vancouver Junction and Vancouver DF: Occurred in April and October 2020-2022-V1093, 1095, MOV 1002, V1091

Seattle Lateral Renton Station and Seattle DF: April and October 2020-2022--MOV 608, 609,MOV607, MP1.5, MP6, MP10

Tacoma Lateral Tacoma DF and Tacoma Junction: April and October 2020-2022--V712, 767, V952

Seatac Lateral Seatac DF, Renton Station: April and October 2020-2022-MOV1102, MOV 662 MP1, MP1.5

112. Question Result, ID, References Sat, MO.LM.VALVEMAIN.T.O, 195.420(a) (195.420(c)) (also presented in: FS.VA)

Question Text *Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?*

Assets Covered 88987 (1690)

Result Notes MP 5.9 Seattle Lateral Henderson St Block valve

MP 10 Seattle Lateral BV 6th and Charleston

MP 1.1 Seatac Lateral Green River BV



Inlet and outlet valves at Tank 102,103 and 107

Vancouver Lateral V1003 Vancouver DF

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

113. Question Result, ID, References **Sat, MO.ABNORMAL.ABNORMALREVIEW.R, 195.404(b) (195.402(d)(5))**

Question Text *Do records indicate post-event reviews of actions taken by operator personnel to determine the effectiveness of the abnormal operation procedures and whether corrective actions were taken where deficiencies were found?*

Assets Covered **88987 (1690)**

Result Notes **P195.402(d) Abnormal Operations**

Event which exceeds design limits:

- A. Unintended valve closure
- B. Unintended station shut down
- C. Comm failure
- D. SCADA failure
- E. Flow pressure deviations outside normal limits
- F. Operations of a safety device-
- G. HI HI tank alarms

WO 8481165 VAN DF Van inlet failed to open V1002 6/11/22

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WO8190071 VAN DF Tank 107 HI level 8/25/21-tank full needed to remove product.

WO8504954 TAC DF High pressure alarm 191 psi at meter PT 1003 7/8/22

WO8592539 TAC DF High downstream pressure PSV 750 9/16/22-Blown fuse on surge valve alarm

WO8448948 VAN DF High downstream pressure surge alarm 5/2/2022 set at 200 reached 207psi

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

114. Question Result, ID, References **NA, MO.RW.DEPTHSURVEY.R,**

Question Text *Do records indicate that depth of cover surveys were completed as required by WAC 480-75-640?*

Assets Covered **88987 (1690)**

Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. All constructed prior to 1970. However, OPL does collect depth of cover when they complete CIS work. There are no lateral sections which OPL requires lowering.**

115. Question Result, ID, References **NA, MO.RW.CHANGEINCLASS.R,**

Question Text *Do records indicate that the operator reevaluated class location periodically, but not less often than once every five years?*

Assets Covered **88987 (1690)**

Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

WAC 480-75-550 is for pipelines complying with 480-75-360 (class location) and 480-75-370 (design formula). It requires a re-evaluation of class location every 5 years. However, both the 360 and 370 WACs are for "new" pipelines. For the purposes of this code, that would for pipelines installed after 9/26/2002, the date the code was adopted. The laterals were installed in 1965 pre code (and pre federal code). Therefore this section does not apply to OPL laterals.

## MO.LC: Liquid Conversion

116. Question Result, ID, References **NA, MO.LC.CONVERSION.R, 195.5(c) (195.5(a), 195.5(d))**  
Question Text *Do records indicate the process was followed for converting any pipelines into Part 195 service?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## MO.EW: Extreme Weather

117. Question Result, ID, References **NA, MO.EW.EXTWEATHERINSPIMPL.R, 195.404(c) (195.414(a), 195.414(b), 195.414(c), 195.414(d))**  
Question Text *Do records indicate the operator conducted the required inspection following and extreme weather or natural disaster event?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
118. Question Result, ID, References **NA, MO.EW.EXTWEATHERINSPSAFE.O, 195.414(d)**  
Question Text *Are the pipeline facilities that were affected by an extreme weather or natural disaster event back to a safe operating condition?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## PD.DP: Damage Prevention

119. Question Result, ID, References **Sat, PD.DP.PROGRAM.R, 195.442(a)**  
Question Text *Do records indicate the damage prevention program is being carried out as written?*  
Assets Covered **88987 (1690)**  
Result Notes **Reviewed locate tickets from 2020, 2021 2022**

20101634 3/16/20 SeaTac not involved

20100947 3/18/20 Tacoma

21098443 3/12/21 Olympia Lateral

21099835 3/12/21 Renton Mainline

22208118 5/12/22 Tacoma Lateral

22207976 5/12/22 Renton Mainline

Positive response done by OPL sends to excavator and call center

120. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**  
Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*  
Assets Covered **88987 (1690)**

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

Positive response done by OPL sends to excavator and call center

121. Question Result, ID, References Sat, PD.DP.COMMISSIONREPORT.R,

Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-75-630(6)?*

Assets Covered 88987 (1690)

Result Notes Aerial Patrol-if anywhere close-reported to field personnel and they treat it as an emergency and dispatch to site. One call ticket is made for those.

Field patrol-similar report to one call center.

122. Question Result, ID, References Sat, PD.DP.LOCATES.R,

Question Text *Do records indicate hazardous liquid pipeline locations have been marked in the timeframe outlined in RCW 19.122?*

Assets Covered 88987 (1690)

Result Notes Reviewed locate tickets from 2020, 2021 2022

20101634 3/16/20 SeaTac not involved

20100947 3/18/20 Tacoma

21098443 3/12/21 Olympia Lateral

21099835 3/12/21 Renton Mainline

22208118 5/12/22 Tacoma Lateral

22207976 5/12/22 Renton Mainline

Positive response done by OPL sends to excavator and call center

None in OPL system since last inspection.

## PD.PA: Public Awareness

123. Question Result, ID, References NC, PD.PA.AUDIENICEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*

Assets Covered 88987 (1690)

Result Notes Formal Public Awareness inspection was conducted by UTC in October 2020-no findings

This inspection reviewed the 4-year effectiveness review conducted in 2022.

124. Question Result, ID, References NC, PD.PA.EDUCATE.R, 195.440(d) (195.440(f))

Question Text *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a hazardous liquid or carbon dioxide pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; and (5) Procedures to report such an event?*

Assets Covered 88987 (1690)

Result Notes Formal Public Awareness inspection was conducted by UTC in October 2020-no findings

This inspection reviewed the 4-year effectiveness review conducted in 2022.

125. Question Result, ID, References **NC, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f))**  
Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?*  
Assets Covered **88987 (1690)**  
Result Notes Formal Public Awareness inspection was conducted by UTC in October 2020-no findings  
  
This inspection reviewed the 4-year effectiveness review conducted in 2022.
126. Question Result, ID, References **NC, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1)**  
Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1?*  
Assets Covered **88987 (1690)**  
Result Notes Formal Public Awareness inspection was conducted by UTC in October 2020-no findings  
  
This inspection reviewed the 4-year effectiveness review conducted in 2022.
127. Question Result, ID, References **NC, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 Section 2.3.1)**  
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
Assets Covered **88987 (1690)**  
Result Notes Formal Public Awareness inspection was conducted by UTC in October 2020-no findings  
  
This inspection reviewed the 4-year effectiveness review conducted in 2022.
128. Question Result, ID, References **Sat, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**  
Question Text *Has an audit or review of the public awareness program implementation been performed annually since the program was developed?*  
Assets Covered **88987 (1690)**  
Result Notes **2007, 2011, 2015, 2019, 2022**
129. Question Result, ID, References **Sat, PD.PA.AUDITMETHODS.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**  
Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of the public awareness program implementation?*  
Assets Covered **88987 (1690)**  
Result Notes **3rd party contractor CYERA (2022)**
130. Question Result, ID, References **Sat, PD.PA.PROGRAMIMPROVE.R, 195.440(c) (API RP 1162 Section 8.3)**  
Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*  
Assets Covered **88987 (1690)**  
Result Notes **PAP Strategic Communication Roadmap 2022-2025**  
  
**Pilot use of USPS deliverability tracking system**  
  
**Chinese languages zip 98108 King? Not completed due to too many dialects.**
131. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 Sections 8.4)**  
Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*  
Assets Covered **88987 (1690)**

Result Notes Effectiveness Review for period 2018-2021 completed November 29, 2022 CYERA

Reviewed recommendations and progress. No issues noted.

AP WO EX and PO all represented

Enertech does mailings started in 2022-sending a BP specific brochure or OPL for PNW.

132. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 195.440(c) (API RP 1162 Section 8.4.1)

Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*

Assets Covered 88987 (1690)

Result Notes Effectiveness Review for period 2018-2021 completed November 29, 2022 CYERA

Section 4.0 of Effectiveness review

AP EO EX PO

133. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(c) (API RP 1162 Section 8.4.2)

Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered 88987 (1690)

Result Notes Effectiveness Review for period 2018-2021 completed November 29, 2022 CYERA

Section 4.0

AP 43% EO 92% EX 59% PO 78%

134. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 195.440(c) (API RP 1162 Section 8.4.3)

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered 88987 (1690)

Result Notes Reviewed Section 7.0 Efforts to Measure Message Comprehension and Knowledge

AP awareness table of recognizing a leak 2007-2021

Know of whether a pipeline is near you

Contact info

811 awareness

Hazards

EO

awareness of pipelines

Are you informed

EX

811 awareness

Signs of a leak

Potential Hazards of a leak

PO

Awareness of pipelines

811

135. Question Result, ID, References Sat, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 Section 8.4.4)

Question Text *Did the operator attempt to measure bottom-line results of the program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*

Assets Covered 88987 (1690)

Result Notes Hits use CGA tracking tool

Near misses-not following dig law; not following BP requirements

10/19/21 air knife disbonded top of coating when potholing

136. Question Result, ID, References Sat, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered 88987 (1690)

Result Notes PAP Strategic Communication Roadmap 2022-2025

Pilot use of USPS deliverability tracking system

Chinese languages zip 98108 King? Not completed due to too many dialects.

## RPT.RR: Regulatory Reporting (Traditional)

137. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 195.49 (195.13(b), 195.15(b))

Question Text *Do the records indicate that complete and accurate Annual Reports have been submitted?*

Assets Covered 88987 (1690)

Result Notes Reviewed annual reports for

2020 (6/09/21)2 anomaly digs,

2021 (6/08/22) 1 anomaly dig,

2022 (5/25/23) 0 anomaly digs-Note discrepancy in mileage 46.6 miles v 46.7 miles? Discussed with OPL and they believe its a rounding error based on mileage database.

1970-79 10.5 miles pipe 2022, 41.1 miles HCA-commercial nav 0.7

1970-79 10.5 miles pipe 2021, 41.4 miles HCA-commercial nav 2.9

1970-79 10.2 miles pipe 2020, 41.4 miles HCA-commercially nav 2.9

3 breakout tanks

138. Question Result, ID, References NA, RPT.RR.GRAVITY.R, 195.49 (195.13(b))

Question Text *Do Annual Reports include applicable information for gravity lines?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

139. Question Result, ID, References **NA, RPT.RR.REGONLYGATHER.R, 195.49 (195.15(b))**  
 Question Text *Do Annual Reports include applicable information for regulated-only gathering lines?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
140. Question Result, ID, References **NA, RPT.RR.ACCIDENTREPORT.R, 195.54(a) (195.50(a), 195.50(b), 195.50(c), 195.50(d), 195.50(e), 195.13(b), 195.15(b))**  
 Question Text *Do records indicate the original accident reports were filed as required?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
141. Question Result, ID, References **NA, RPT.RR.ACCIDENTREPORTSUPP.R, 195.54(b) (195.13(b), 195.15(b))**  
 Question Text *Do records indicate accurate supplemental accident reports were filed and within the required timeframe?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
142. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 195.52(a) (195.52(b), 195.52(c), 195.52(d))**  
 Question Text *Do records indicate immediate notifications of accidents were made in accordance with 195.52?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
143. Question Result, ID, References **NA, RPT.RR.SRCR.R, 195.56(a) (195.55(a), 195.55(b), 195.56(b), 195.13(b), 195.15(b))**  
 Question Text *Do records indicate Safety-Related Condition Reports were filed as required?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
144. Question Result, ID, References **NA, RPT.RR.NPMSABANDONWATER.R, 195.59(a)**  
 Question Text *Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
145. Question Result, ID, References **Sat, RPT.RR.NPMSANNUAL.R, 195.61(a) (195.61(b))**  
 Question Text *Do records indicate: NPMS submissions are completed each year, on or before June 15, representing all in service, idle and retired assets as of December 31 of the previous year, and if no modifications occurred an email to that effect was submitted?*  
 Assets Covered **88987 (1690)**  
 Result Notes **2/6/23 OSAVE notification from NPMS**  
**4/29/22 OSAVE notification from NPMS**  
**5/24/21 OSAVE notification from NPMS**
146. Question Result, ID, References **Sat, RPT.RR.PIPELINEMAPPING.R,**  
 Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*  
 Assets Covered **88987 (1690)**  
 Result Notes **OPL's lines are shown on UTC mapping. May need to prepare a procedure for updates.**
147. Question Result, ID, References **NA, RPT.RR.CONSTRUCTIONREPORT.R,**  
 Question Text *Do records indicate operator has reported all construction of new pipelines intended to operate at 20% SMYS or greater at least 45 days prior to construction?*  
 Assets Covered **88987 (1690)**

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

148. Question Result, ID, References NA, RPT.RR.DIRTREPORTS.R,

Question Text Do records indicate that the operator has submitted reports of damage to the commission using the Damage Information Reporting Tool (DIRT) within 45 days?

Assets Covered 88987 (1690)

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

## TD.ATM: Atmospheric Corrosion

149. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 195.589(c) (195.583(a), 195.583(b), 195.583(c))

Question Text Do records document inspection of aboveground pipe exposed to atmospheric corrosion?

Assets Covered 88987 (1690)

Result Notes Reviewed records 2020-2023

Only one facility was poor-Van Junction MLV 1090 10/18/22 poor surface rusting

150. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 195.583(c) (195.581(a))

Question Text Is aboveground pipe that is exposed to atmospheric corrosion protected?

Assets Covered 88987 (1690)

Result Notes Observed breakout tanks 102,103 and 107 as well as all above ground pipe in Renton and Olympia stations and at Seattle, Tacoma and Vancouver DFs. No issues noted with coatings.

## TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection

151. Question Result, ID, References Sat, TD.CPBO.BO.R, 195.589(c) (195.573(d))

Question Text Do records adequately document when and how cathodic protection systems were inspected on breakout tanks?

Assets Covered 88987 (1690)

Result Notes Reviewed records for annual testing which includes breakout tanks 102,103,107 for 2020 to 2023 OK

152. Question Result, ID, References Concern, TD.CPBO.BO.O, 195.573(d)

Question Text Are cathodic protection monitoring tests performed correctly on breakout tank bottoms?

Assets Covered 88987 (1690)

Result Issue Summary Tank 107 S -1927 -971 E -1984 -783 -577 N -2242 -941 **W -1667 -735 -677 Low read on west side of tank. Native is within 100mv. Does not meet protection criteria.**

Gerald Wismer took new native reads and then new PSP reads on Tank 107. Meets criteria see attachments.

Result Notes Tank 102 N -1684 -1357 E -1098 -1001 W -2073 -1405 S -1075 -915

Tank 103 E -2833 -1073 N -3455 -1992 W -3320 -1885 S -2706 -1302

Tank 107 S -1927 -971 E -1984 -783 -577 N -2242 -941 **W -1667 -735 -677 Low read on west side of tank. Native is within 100mv. Does not meet protection criteria.**

153. Question Result, ID, References NA, TD.CPBO.DEFICIENCYBO.R, 195.589(c) (195.573(e))

Question Text Do records document adequate operator actions taken to correct any identified deficiencies in breakout tank corrosion control?

Assets Covered 88987 (1690)

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

## TD.CP: External Corrosion - Cathodic Protection



154. Question Result, ID, References **NA, TD.CP.NEWOPERATE.R, 195.589(c) (195.563(a))**  
 Question Text *Do records document when cathodic protection was operational on constructed, relocated, replaced, converted to service, or otherwise changed pipelines?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
155. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 195.589(c) (195.573(b)(1), 195.573(b)(2))**  
 Question Text *Do records document the adequate re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
156. Question Result, ID, References **Sat, TD.CP.ISOLATE.R, 195.589(c) (195.575(a), 195.575(b), 195.575(d))**  
 Question Text *Do records document adequate electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No low reads which did not meet criteria., no shorted casings. Tacoma DF has low reads and is on workplan for 2023.**
157. Question Result, ID, References **Concern, TD.CP.ISOLATE.O, 195.575(a) (195.575(b), 195.575(d))**  
 Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*  
 Assets Covered **88987 (1690)**  
 Result Issue Summary **-1773 -1246 Isolation Station pipeline -1772 -1247 not isolated**  
  
 Gerald Wismer bonded across the isolation kit-see attachments  
 Result Notes **Isolation between Vancouver DF and Vancouver lateral**  
  
**-1773 -1246 Isolation Station pipeline -1772 -1247 not isolated**  
  
 Renton station and Seattle lateral -2387 -1203 pipeline -1936 -942  
  
 Seatac lateral -3026 -1327 -1553 -894 Renton station
158. Question Result, ID, References **Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP.MONITOR, TD.CP.EXPOSED)**  
 Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No annual reads which did not meet criteria. Tacoma DF is experiencing current loss. BP is working on a plan for 2023.**
159. Question Result, ID, References **Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CP.MONITOR)**  
 Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Trailblazer online mapping system.**  
  
**Test Stations, rectifiers, casings, etc.**

## TD.CP.MONITOR: External Corrosion - Cathodic Protection Monitoring

160. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEADINSTALL.R, 195.589(c) (195.567(b))**  
 Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart H?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Test leads on all test stations to get reads.**
161. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEADINSTALL.O, 195.567(a) (195.567(b))**  
 Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart H?*  
 Assets Covered **88987 (1690)**  
 Result Notes **All leads tested were attached and produced good PSP reads**
162. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEADMAINT.R, 195.589(c) (195.567(c))**  
 Question Text *Do records document that CP test lead wires have been properly maintained?*  
 Assets Covered **88987 (1690)**  
 Result Notes **2020**
- 10th st casing Renton to Seattle 12" lateral-new leads in 2020**
- 2021 SE 128th ST New TS for casing.**
- 12" Vancouver to Vancouver DF replaced TS for a bad one Sta 54+12-Lower River Rd crossing**
- 2022**
- 12" Renton to Seattle East Marginal Way under W. Seattle Bridge replaced Big Fink.**
- Beacon St, replaced Big Fink**
- 14th Ave replaced riser and reattached wires.**
163. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEADMAINT.O, 195.567(c)**  
 Question Text *Are CP test lead wires properly maintained?*  
 Assets Covered **88987 (1690)**  
 Result Notes **All leads tested were attached and produced good PSP reads**
164. Question Result, ID, References **Sat, TD.CPMONITOR.MONITOR.O, 195.571**  
 Question Text *Do the methods for taking CP monitoring readings allow for the application of appropriate CP monitoring criteria?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Checked PSP reads at areas noted in Attachments. All met criteria except West read on tank 107 in Vancouver.**
165. Question Result, ID, References **Sat, TD.CPMONITOR.TEST.R, 195.589(c) (195.573(a)(1))**  
 Question Text *Do records adequately document required tests have been done on pipe that is cathodically protected?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Reviewed Lateral annual CP tests 2020 to 2022**
- 2022 replaced RMUs so only have "on" reads**
- RE-ST-12 STP #2A -906 -782mv**
- RE valve 662 -765**

Tacoma DF-low reads but meet criteria with 100mv shift

166. Question Result, ID, References **Sat, TD.CPMONITOR.CIS.R, 195.589(c) (195.573(a)(2))**  
Question Text *Do records document, when circumstances dictated a need for close interval surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys?*  
Assets Covered **88987 (1690)**  
Result Notes **Seatac Lateral 5/30/18**  
  
**Seattle Lateral 5/30/18**  
  
**Tacoma Lateral 4/11/19**  
  
**RE-ST-12 STP #2A -906 -782m**  
  
**Vancouver Lateral 4/26/22**
167. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.R, 195.589(c) (195.573(c))**  
Question Text *Do records document adequate electrical checks of rectifiers, interference bonds, diodes, and reverse current switches and at the required intervals?*  
Assets Covered **88987 (1690)**  
Result Notes **Reviewed rectifier and bond checks for 2020 to 2022.**  
  
**bonds**  
  
**Olympia to Oly DF**  
  
**Shell-Shell tank farm**  
  
**Tacoma DF - NuStar tank farm**
168. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.O, 195.573(c)**  
Question Text *Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*  
Assets Covered **88987 (1690)**  
Result Notes **Checked the following rectifiers**  
  
**Renton Station/Seattle and Seatac laterals**  
  
**Seattle DF**  
  
**Vancouver DF**  
  
**Tacoma DF**
169. Question Result, ID, References **NA, TD.CPMONITOR.INTFRCURRENT.R, 195.589(c) (195.577(a))**  
Question Text *Do records document that the operator has an effective program in place to minimize the detrimental effects of interference currents on their pipeline system, and is minimizing detrimental effects of interference currents from their CP systems on other underground metallic structures?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No detrimental currents noted during inspection interval.**
170. Question Result, ID, References **NA, TD.CPMONITOR.INTFRCURRENT.O, 195.577(a)**  
Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*  
Assets Covered **88987 (1690)**

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

## TD.COAT: External Corrosion - Coatings

171. Question Result, ID, References **NA, TD.COAT.NEWPIPEINSPECT.R,**  
Question Text *Do records indicate that the operator electrically inspected all new coated pipe using a holiday detector?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
172. Question Result, ID, References **NA, TD.COAT.NEWPIPE.R, 195.589(c) (195.557(a), 195.559, 195.401(c))**  
Question Text *Do records document that coatings for pipelines constructed, relocated, replaced, or otherwise changed meet the requirements of §195.559?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
173. Question Result, ID, References **NA, TD.COAT.CONVERTPIPE.R, 195.589(c) (195.557(b), 195.559)**  
Question Text *Do records document that pipelines that have been converted to liquid service and were constructed after the applicable date in 195.401(c) have external coating?*  
Assets Covered **88987 (1690)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
174. Question Result, ID, References **NA, TD.COAT.COATAPPLY.O, 195.561(a) (195.561(b), 195.559(b), 195.252(b))**  
Question Text *Is protective coating adequately applied?*  
Assets Covered **88987 (1690)**  
Result Notes **No such activity/condition was observed during the inspection.**

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

175. Question Result, ID, References **Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 195.589(c) (195.569)**  
Question Text *Do records document that exposed buried piping was adequately examined for corrosion and deteriorated coating?*  
Assets Covered **88987 (1690)**  
Result Notes **10/6/20 Seattle Lateral ILI dig**  
  
**113+03**  
  
**tool called 50% metal loss on weld seam**  
  
**Installed 3 clocksprings and recoated with Denso 7200**  
  
**6/30/20 Tacoma Lateral**  
  
**94+83 95+04**  
  
**-1653 mv**  
  
**tool called 50% metal loss 0.41"x0.75"**  
  
**Recoated with Denso 7200**  
  
**8/20/21 Vancouver lateral**  
  
**16+72 17+26**

tool called external corrosion 16% and 20%

recoated with Denso 7200

176. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 195.569

Question Text *Verify that exposed buried piping is examined for corrosion and deteriorated coating.*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

177. Question Result, ID, References NA, TD.CPEXPOSED.EXTCORRODEREPAIR.R, 195.589(c) (195.585(a), 195.585(b))

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 88987 (1690)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## TD.ICP: Internal Corrosion - Preventive Measures

178. Question Result, ID, References NA, TD.ICP.INVESTREMEDI.R, 195.589(c) (195.579(a))

Question Text *Do records document investigation and mitigation of the corrosive effects of hazardous liquids or carbon dioxide being transported?*

Assets Covered 88987 (1690)

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

179. Question Result, ID, References NA, TD.ICP.INHIBITOR.R, 195.589(c) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text *Do records document that corrosion inhibitors have been used in sufficient quantity?*

Assets Covered 88987 (1690)

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

180. Question Result, ID, References NA, TD.ICP.EXAMINE.R, 195.589(c) (195.579(c), 195.579(a))

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered 88987 (1690)

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

181. Question Result, ID, References Sat, TD.ICP.BOLINING.R, 195.589(c) (195.579(d))

Question Text *Do records document the adequate installation of breakout tank bottom linings?*

Assets Covered 88987 (1690)

Result Notes Tanks 102 Seattle DF 103 Tacoma DF and 107 Vancouver DF all have epoxy internal liners.

## TQ.PROT9: OQ Protocol 9

182. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 195.501(a) (195.509(a))

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*

Assets Covered 88987 (1690)

Result Notes Insp/Test/Repair Overfill Dev OQTNK05

Brian Duran May09,2025;

Insp Breakout Tanks API 653 monthly OQTNK01;

Brian Duran Nov 12, 2023

Maintain and Inspection Valves OQVAL02

Jeffrey Peltzer Oct 26, 2025

Brian Duran Oct 06, 2025

CP P-195.551, USPL-GMS-004-001 Generic Maintenance Strategy (GMS) for Atmospheric Storage Tanks-  
PSP reads pipeline, PSP reads BOTs, isolation, rectifier inspection: Gerald Wismer

183. Question Result, ID, References Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 195.501(a) (195.509(a))

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered 88987 (1690)

Result Notes CP P-195.551, USPL-GMS-004-001 Generic Maintenance Strategy (GMS) for Atmospheric Storage Tanks-  
PSP reads pipeline, PSP reads BOTs, isolation, rectifier inspection: Gerald Wismer

Valve inspection and operation P-195.258

ROW/patrolling P-195.412 and 412(a)

Verified the following were qualified:

Insp/Test/Repair Overfill Dev OQTNK05

Brian Duran May09,2025;

Insp Breakout Tanks API 653 monthly OQTNK01;

Brian Duran Nov 12, 2023

Maintain and Inspection Valves OQVAL02

Jeffrey Peltzer Oct 26, 2025

Brian Duran Oct 06, 2025

CP P-195.551, USPL-GMS-004-001 Generic Maintenance Strategy (GMS) for Atmospheric Storage Tanks-  
PSP reads pipeline, PSP reads BOTs, isolation, rectifier inspection: Gerald Wismer

184. Question Result, ID, References Sat, TQ.PROT9.AOCRECOG.O, 195.501(a) (195.509(a))

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered 88987 (1690)

Result Notes Brian Duran-Insp/Test/Repair Overfill device OQTNK05 5/9/2025

Brian Duran-Insp Breakout tanks API 653 monthly OQTNK01 11/12/23

Jeffrey Peltzer-Maintain/Inspect valves-OQVAL02 10/26/25

Gerald Wismer-Take Pipe to Soil Reading

Gerald Wismer-Rectifier inspect/maintain

Gerald Wismer-Atmospheric corrosion inspect/maintain

Asked individual employees what were AOCs for task they were performing and what to do if abnormal

185. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 195.501(a) (195.509(a))**  
 Question Text *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*  
 Assets Covered **88987 (1690)**  
 Result Notes **Brian Duran-Insp/Test/Repair Overfill device OQTNK05 5/9/2025**
- Brian Duran-Insp Breakout tanks API 653 monthly OQTNK01 11/12/23**
- Jeffrey Peltzer-Maintain/Inspect valves-OQVAL02 10/26/25**
- Gerald Wismer-Take Pipe to Soil Reading**
- Gerald Wismer-Rectifier inspect/maintain**
- Gerald Wismer-Atmospheric corrosion inspect/maintain**
186. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 195.501(a) (195.509(a))**  
 Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **TQ.OQ: Operator Qualification**

187. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.R, 195.507(a) (195.507(b))**  
 Question Text *Are adequate records containing the required elements maintained for contractor personnel?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Contractor employees:**
- NDE Acuren Inspection**
- Carlos Roderos**
- Visual 5/12/22**
- NDT Radiographic 9/22/22**
- NDT Mag Particle 9/22/22**
- Hanging H Companies**
- Josh Littleton Coatings, jeeping 9/24/24**
- Max Lohman Coating jeeping 4/3/26**
- Marion Martin Coatings, jeeping 6/13/25**
- Payton Thayer Coatings, jeeping 9/24/24**
- Colby Tyra Coatings, jeeping 12/7/25**
- Michael Wilson hydrotest, welder 4/3/26**
- Patrick Helleck hydrotest welder 4/3/26**

OPL employees:

Insp/Test/Repair Overfill Dev OQTNK05

Brian Duran May09,2025;

Insp Breakout Tanks API 653 monthly OQTNK01;

Brian Duran Nov 12, 2023

Maintain and Inspection Valves OQVAL02

Jeffrey Peltzer Oct 26, 2025

Brian Duran Octo 06, 2025

CP P-195.551, USPL-GMS-004-001 Generic Maintenance Strategy (GMS) for Atmospheric Storage Tanks-  
PSP reads pipeline, PSP reads BOTs, isolation, rectifier inspection: Gerald Wismer

188. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 195.507(a) (195.507(b))

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 88987 (1690)

Result Notes Gary Gomez Right of Way Surveillance 16 May 22 16 May 19

Steve Kynaston 28 June 22 28 June 19

Derek Martin 16May22 16 May 19

Spencer Rogerson 15May22 15May19

Dean Christenson 3Jul22 3Jul19

NDE Acuren Inspection

Carlos Roderos

Visual 5/12/22

NDT Radiographic 9/22/22

NDT Mag Particle 9/22/22

## TQ.QU: Qualification of Personnel - Specific Requirements

189. Question Result, ID, References Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b)) (also presented in: TD.CP)

Question Text *Is qualification of supervisors in corrosion control procedures documented?*

Assets Covered 88987 (1690)

Result Notes Brian Stone

NACE coating inspector 2 Exp 9/31/22

CP2 Exp 12/31/22

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



190. Question Result, ID, References **Sat, TQ.QUOMCONST.INSPECTORQUAL.R, 195.204**  
Question Text *Do records indicate adequate qualification documentation for personnel who conduct pipe or pipeline system construction inspections? (TQ.QUOMCONST.INSPECTORQUAL.R) (detail)*  
Assets Covered **88987 (1690)**  
Result Notes **ILI integrity digs**

James Cargill Tulsa Inspection Service

Visually inspect DOT welds 1/22/21, 1/18/24

Mainline reroute Milton MP 130

Visually inspect pipe and components prior to install 1/22/21, 1/18/24

## **TQ.TROMCONST: Training of Personnel - O and M Construction**

191. Question Result, ID, References **Sat, TQ.TROMCONST.NDT.R, 195.234(b)(2)**  
Question Text *Is training for personnel, who perform nondestructive testing of welds, documented and demonstrated?*  
Assets Covered **88987 (1690)**  
Result Notes **NDE Acuren Inspection on Mainline reroute Milton 2023**

Carlos Roderos

Visual 5/12/22

NDT Radiographic 9/22/22

NDT Mag Particle 9/22/22

## **TDC.WELDPROCEDURE: New Tank Piping - Construction Welding Procedures (Re-Presented)**

192. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b)** (also presented in: DC.WELDPROCEDURE)  
Question Text *Do records indicate welding procedures and qualifying tests recorded in detail?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **TDC.WELDERQUAL: New Tank Piping - Construction Welder Qualification (Re-Presented)**

193. Question Result, ID, References **NA, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME Boiler & Pressure Vessel Code Section IX)** (also presented in: DC.WELDERQUAL)  
Question Text *Do records indicate that welders are qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **TDC.WELDINSP: New Tank Piping - Construction Weld Inspection (Re-Presented)**

194. Question Result, ID, References **NA, DC.WELDINSP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234)** (also presented in: DC.WELDINSP)  
Question Text *Do records indicate welds are inspected to ensure compliance with the requirements of 195.228?*  
Assets Covered **88987 (1690)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

195. Question Result, ID, **NA**, DC.WELDINSP.WELDINSPECT.O, 195.228(a) (195.228(b), 195.234) (also presented in: References DC.WELDINSP)  
 Question Text *Are welds being inspected to ensure compliance with the requirements of 195.228?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
196. Question Result, ID, **NA**, DC.WELDINSP.WELDNDT.R, 195.234(a) (195.234(b), 195.234(c)) (also presented in: DC.WELDINSP)  
 Question Text *Do records indicate adequate nondestructive testing and determination of standards of acceptability?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
197. Question Result, ID, **NA**, DC.WELDINSP.WELDNDT.O, 195.234(a) (195.234(b), 195.234(c)) (also presented in: DC.WELDINSP)  
 Question Text *Are NDT activities performed in accordance with approved processes?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
198. Question Result, ID, **NA**, DC.WELDINSP.GIRTHWELDNDT.R, 195.234(d) (195.266(a)) (also presented in: DC.WELDINSP)  
 Question Text *Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
199. Question Result, ID, **NA**, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a)) (also presented in: References DC.WELDINSP)  
 Question Text *Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
200. Question Result, ID, **NA**, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a)) (also presented in: DC.WELDINSP)  
 Question Text *Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
201. Question Result, ID, **NA**, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a)) (also presented in: DC.WELDINSP)  
 Question Text *Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?*  
 Assets Covered **88987 (1690)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **FS.TSAPIINSPECT: Tanks and Storage - Inspection**

202. Question Result, ID, **Sat**, FS.TS.BOINSPECTION.O, 195.432(a) (195.432(b), 195.432(c), 195.401(b)) (also presented in: References FS.TS)  
 Question Text *Is the condition of steel atmospheric or low pressure tanks acceptable?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Visually inspected Tanks for corrosion, bottom chime seal, stair condition, water around tank, dents/scrapes, hold downs, railings, signage, valves, level indicator, venting.**

**102 Seattle**

**103 Tacoma**

**FS.PS: Pump Stations**

203. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: MO.LMOPP)

Question Text Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?

Assets Covered 88987 (1690)

Result Notes Thermal RVs for 2020-2022 (annual)

Seattle DF

Vancouver DF

SeatacDF

Tacoma DF

Relief Valves

Seatac DF

Seattle DF

Vancouver DF

TAcoma DF

204. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: MO.LMOPP)

Question Text Are inspections of overpressure safety devices adequate (including HVL lines)?

Assets Covered 88987 (1690)

Result Notes Checked thermal and surge relief overpressure devices at Renton, Olympia Stations; Seattle, Tacoma and Vancouver DFs.

No pump stations on laterals.

205. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426 (also presented in: MO.LMOPP)

Question Text Are launchers and receivers equipped with relief devices?

Assets Covered 88987 (1690)

Result Notes Relief devices noted at Renton and Olympia Stations; Seattle Tacoma and Vancouver DF and Tacoma and Vancouver junctions

**FS.VA: Valves**

206. Question Result, ID, References Sat, MO.LM.VALVEMAIN.T.R, 195.404(c) (195.420(a), 195.420(b)) (also presented in: MO.LM)

Question Text Do records indicate each mainline valve was inspected as required?

Assets Covered 88987 (1690)

Result Notes Reviewed Work Order records indicating bi-annual inspections of valves:

Vancouver Lateral Vancouver Junction and Vancouver DF: Occurred in April and October 2020-2022-V1093, 1095, MOV 1002, V1091

Seattle Lateral Renton Station and Seattle DF: April and October 2020-2022--MOV 608, 609,MOV607, MP1.5, MP6, MP10

Tacoma Lateral Tacoma DF and Tacoma Junction: April and October 2020-2022--V712, 767, V952

Seatac Lateral Seatac DF, Renton Station: April and October 2020-2022-MOV1102, MOV 662 MP1, MP1.5

207. Question Result, ID, References Sat, MO.LM.VALVEMAIN.T.O, 195.420(a) (195.420(c)) (also presented in: MO.LM)

Question Text *Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?*

Assets Covered 88987 (1690)

Result Notes MP 5.9 Seattle Lateral Henderson St Block valve

MP 10 Seattle Lateral BV 6th and Charleston

MP 1.1 Seatac Lateral Green River BV

Inlet and outlet valves at Tank 102,103 and 107

Vancouver Lateral V1003 Vancouver DF

## PD.PA: Public Awareness

208. Question Result, ID, References Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also presented in: EP.ERL)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 88987 (1690)

Result Notes This question was covered during the OPL mainline integrated inspection conducted by PHMSA CRO October 2023.

## PD.RW: ROW Markers, Patrols, Monitoring

209. Question Result, ID, References Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: MO.RW)

Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*

Assets Covered 88987 (1690)

Result Notes Reviewed patrolling records for the following laterals: 2020-12/2022

The Vancouver, Olympia, and Tacoma laterals are flown as well as driven.

They are driven weekly because the Damage Prevention Team member is already out there, but also so don't have to worry if the pilot makes it up or not'

Seattle-Spencer Rogerson, Derek Martin, Mark Skodje 1/2020-5/2020? Field Maps application started in 5/2020. Previous patrols are paper.

6/5/2020 Renton to Seattle Delivery Ground patrol-all marked "no". If "yes" will generate an email to team lead and person doing patrol.

8/12/21 Renton to Seattle

Seatac-Spencer Rogerson, Derek Martin, Mark Skodje 1/2020 to 6/2020?

Tacoma-Spencer Rogerson, Derek Martin 1/2020-6/2020?

Olympia-Steven Kynaston, Frederick Byerly, Dean Christenson 1/2020-4/2020?

Vancouver-Dean Christenson, Brian Duran, Steven Kynaston 1/2020-9/2020

210. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 195.412(a)** (also presented in: MO.RW)  
 Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Mile markers are clearly visible. OK for driving and aerial patrols.**
211. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c))** (also presented in: MO.RW)  
 Question Text *Are line markers placed and maintained as required?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Observed line markers along ROW. No issues note.**

## **PD.SN: Facilities Signage and Security**

212. Question Result, ID, References **Sat, FS.FG.FACPROTECT.O, 195.436** (also presented in: FS.FG)  
 Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Fenced Enclosures with padlocked gates. Signage, lighting: Renton Station, Olympia Station, Seattle DF, Seatac DF, Tacoma Junction and DF, Vancouver Junction and DF**
213. Question Result, ID, References **Sat, FS.FG.IGNITION.O, 195.438** (also presented in: FS.FG)  
 Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Signage on fencing around Block valves**
- Renton, Olympia, Tacoma stations,**
- Seattle Tacoma and Vancouver DFs**
- Tacoma and Vancouver junctions,**
- breakout tanks 102, 103 and 107 are located inside a fenced facility.**
214. Question Result, ID, References **Sat, FS.FG.SIGNAGE.O, 195.434** (also presented in: FS.FG)  
 Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Observed Operator signs with correct phone number to control room at Olympia and Renton stations; Seattle, Tacoma and Vancouver DFs, Tacoma and Vancouver Junctions, vavles.**

## **TD.CP: External Corrosion - Cathodic Protection**

215. Question Result, ID, References **Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b))** (also presented in: TQ.QU)  
 Question Text *Is qualification of supervisors in corrosion control procedures documented?*  
 Assets Covered **88987 (1690)**  
 Result Notes **Brian Stone**
- NACE coating inspector 2 Exp 9/31/22**
- CP2 Exp 12/31/22**

## **TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring**

216. Question Result, ID, References **Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e))** (also presented in: TD.CP, TD.CPEXPOSED)

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 88987 (1690)

Result Notes No annual reads which did not meet criteria. Tacoma DF is experiencing current loss. BP is working on a plan for 2023.

217. Question Result, ID, References Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CP)

Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*

Assets Covered 88987 (1690)

Result Notes Trailblazer online mapping system.

Test Stations, rectifiers, casings, etc.

## **TD.CPEXPOSED: External Corrosion - Exposed Pipe**

218. Question Result, ID, References Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR)

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 88987 (1690)

Result Notes No annual reads which did not meet criteria. Tacoma DF is experiencing current loss. BP is working on a plan for 2023.

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.