

POST INSPECTION MEMORANDUM

Inspector: Scott Rukke /UTC 3/20/2013
Reviewed: Joe Subsits /UTC 3/22/2013
Peer Reviewed: _____
Follow-Up Enforcement: Three Violations
PCP* PCO* NOA WL LOC
Director Approval: _____

Date: March 20, 2013

Operator Inspected: Phillips 66 Corporation **OPID:** 31684 **Region:** Western

Unit Address:
6317 E. Sharp Ave.
Spokane, WA 99212

Unit Inspected: Yellowstone Pipe Line – Spokane/Moses Lake **Unit ID:** 515
Unit Type: Interstate
Inspection Type: I01-Follow up to low reads found during the standard inspection.
Record Location: Spokane, WA
Inspection Dates: February 27, 2013
Team: Scott Rukke / UTC
AFOD: 1
SMART Activity Number:

Operator Contact: Mike Donally, DOT Coordinator
Phone: (406) 855-6913 **Fax:** (406) 543-5669 **Emergency:** 888-267-2290

Unit Description:

The Spokane District consists of:

- 14 miles of 10" mainline from the Washington State line to the Spokane Terminal;
- 4.94 miles of 10" transfer line from the Spokane Terminal to North Spokane Junction;
- 0.4 miles of 8" transfer line from North Spokane Junction to North Spokane Terminal;
- 1.34 miles of 8" transfer line from North Spokane Terminal to Hillyard Manifold;
- 24 miles of 8" mainline from Spokane Terminal to Fairchild;
- 0.91 miles of inactive 6" Geiger Spur Line from Geiger Junction to Geiger Delivery Station.

Three pump stations are located at Spokane Terminal (300 HP), North Spokane Terminal (150 HP), and Fairchild (150 HP, idled). Breakout Tank Facilities are located at Spokane Terminal (12 tanks), North Spokane Terminal (9 tanks), Fairchild (2 tanks, idled), and Geiger Delivery Station (2 tanks, idled).

The Moses Lake District consists of 87 miles of 6" mainline from Fairchild to Moses Lake Terminal. There is 1 mile of inactive 6" line that extends from Moses Lake Terminal to the Moses Lake Airport and to Boeing Field.

Facilities Inspected:

This inspection consisted of a follow-up to the original inspection conducted in 2012. Originally three probable violations were noted in addition to one area of concern.

Persons Interviewed:

Mike Kuntz, Area Supervisor
Mike Donally, DOT Coordinator
Larry Ferguson, Corrosion Specialist

Follow up on the history of prior offenses that are still open:**Recommendations:**

Send a Notice of Probable Violations (NOPV) for items 1-3 below and follow-up on the area of concern.

Comments:

Three items were originally identified as probable violations and one area of concern:

(1) NOPV

49 CFR 195.573(a)(1) What must I do to Monitor External Corrosion Control?

Phillips 66 procedure MPR-6018, section 7.3.2.3, states that "...each and every test station may not need to be read in order to determine that the system has adequate cathodic protection ...". Phillips 66 has several test stations that were not read between 2009 and 2012 due to accessibility issues and/or the inability to find them. It is unclear whether these test stations were necessary to determine whether the system had adequate cathodic protection. Phillips must either survey all the test stations or show that the level of protection is adequate at the unmonitored portion of the system.

Follow up, 2/27/2013:

All test stations that have accessibility issues were accessed and CP readings obtained. One test station appears to be missing and it is redundant. Reads were taken on both sides of the missing test station and CP levels were good. This test station will be removed from the annual survey. All CP readings were good.

(2) NOPV

49 CFR 195.402(a) Procedural Manual for Operations, Maintenance, and Emergencies.

Phillips 66 procedure MPR-6005 requires control center contact, and a record of this contact each time block valves are maintained and operated. Control center contact was not done during the last valve maintenance survey conducted in October 2012 and employees stated they were unaware of the requirement at the time of the survey. The use of incorrect forms and conflicting procedures as detailed below, partly contributed to the employees not making contact. Phillips 66 procedure MPR-6005 and MPR 2814 each reference a different form revision number to be used when filling out and recording valve survey information. Records reviewed during this inspection indicated that at least three different form revisions were being used. These forms were dated 3/9/2004, 8/28/2006, 4/18/2012 and all indicated they were revision No.1. It appears that when the form is changed or revised that the revision number is not carried forward on the form. Phillips 66 needs to perform valve operation and maintenance work in accordance with an appropriate procedure.

Follow up, 2/27/2013:

Not addressed during this follow up inspection.

(3) NOPV

49 CFR 195.402(a) Procedural Manual for Operations, Maintenance, and Emergencies. Phillips 66 procedure MPR-2301 requires that each time a company employee has contact with an emergency official, that this information be recorded on form MPA 2830-A titled, "A Report of Contact with Emergency Officials." Phillips 66 employees have not been recording this information and were unaware of the existence of this form. Phillips needs to record information as required in their procedure.

Follow up, 2/27/2013:

Not addressed during this follow up inspection.

(4) AOC

49 CFR 195.571 What criteria must I use to determine the adequacy of cathodic protection? During the field portion of the Parkwater Terminal (Spokane) inspection, it was determined that the ground bed was disconnected from the rectifier resulting in low CP values at Tanks 70, 71, 72, and 74. The ground bed has been off line since the summer of 2012. Also, a low reading was found at the 6-inch outlet from the Spokane manifold to Moses Lake. It was felt that there was a damaged wire to the ground bed. A follow-up field inspection should be performed to ensure timely compliance with these low readings.

Follow up, 2/27/2013:

The ground bed was repaired and we verified that all tanks in the Parkwater Terminal (Spokane) now have adequate CP levels.

Recommendations:

Perform follow-up next year and maintain regular inspection schedule.

Attachments:

- Field Data Collection Form – follow-up