



FEDEX Tracking No. 7721 3178 9482

December 08, 2014

Washington Utilities and Transportation Commission
ATTN: David D. Lykken, Pipeline Safety Director
1300 S. Evergreen Park Dr. S.W.
Olympia, Washington 98504

RE: 2014 Hazardous Liquid Pipeline Integrity Management Inspection – Tidewater Terminal Company (Insp. No. 5826)

Mr. Lykken,

On June 16 – 19, 2014 staff from the Washington Utilities and Transportation Commission (UTC) conducted a hazardous liquid inspection at the Tidewater Terminal Company (Tidewater), Snake River Terminal Facility.

The inspection found 22 probable violations as noted in the report dated October 24, 2014 received from UTC. Please find Tidewater’s response to each of the probable violations on the enclosed spreadsheet. Each finding includes Tidewater’s proposed corrective action to the probable violation, the responsible Tidewater employee and the proposed date of completion.

Should you have any questions or concerns, please do not hesitate to contact the undersigned at (360) 759-0306 or bill.collins@tidewater.com or Brian Rankin at (360) 759-0338 or brian.rankin@tidewater.com.

Respectfully,

William H. Collins,
Director, EHS&S

STATE OF WASH.
UTIL. AND TRNG.
COMMISSION
RECEIVED
PROCEDS MANGEMENT
2014 DEC -9 AM 10:28

Number	Regulation	Reference Question	Regulation Statement	Finding	Corrective Action	Responsible Person	Due Date
1	49 CFR 195.452 (h)(4)(iii)(I)	IA RECORD Question #4 for Repair Criteria - Inclusion of All Repair Criteria	(h) What actions must an operator take to address integrity issues? (4) Special requirements for scheduling remediation (iii) 180-Day conditions. Except for conditions listed in paragraph (h)(4)(i) or (ii) of this section, and operator must schedule evaluation and remediation of the following within 180 days of discovery of the condition: (I) A gouge or groove greater than 12.5% of nominal wall.	From the Review of the results of integrity assessments and remediation projects, the ILI vendor did not categorize a defect with a gouge of 48% wall loss as a 180-day condition for remediation.	1. Tidewater will specify in Statement of Work/Contract for ILI vendors specific criteria for reporting of anomalies including the reporting of any item that meets any identified repair requirements. 2. As part of the ILI process (outlined in the IMP) Tidewater will formally review the results with the vendor to ensure that all identified anomalies are properly categorized. This review will be documented. 3. Add the corrective actions described above to the Validation of ILI Results paragraph of Section 7.3, In-Line Inspections. 4. In 2014 Tidewater added procedures to the Integrity Management program outlining requirements for Temporary and Long-Term Pressure Reduction, Discovery of Condition, Schedule for Evaluation and Remediation, and Special Requirements for Scheduling Remediation (including immediate, 60-Day and 180-Day repair conditions) to ensure anomalies and conditions are properly identified and repaired. This was not in place in 2010.	1. Ron McClary 2. Ron McClary 3. Brian Rankin 4. Brian Rankin	1. 12/31/2014 2. 12/31/2014 (Actual review will occur in 2015 during next ILI). 3. 1/15/2015 4. Complete
2	49 CFR 195.452 (h)(4)(iii)(I)	IA OBSERVATION Question #5 for Repair Criteria - Inclusion of All Repair Criteria	(h) What actions must an operator take to address integrity issues? (4) Special requirements for scheduling remediation (iii) 180-Day conditions. Except for conditions listed in paragraph (h)(4)(i) or (ii) of this section, and operator must schedule evaluation and remediation of the following within 180 days of discovery of the condition: (I) A gouge or groove greater than 12.5% of nominal wall.	Document observed for pipe section cut-out for the gouge of 48% wall loss exceeded the 180-day condition for remediation.	1. In 2014 Tidewater added procedures to the Integrity Management program outlining requirements for Temporary and Long-Term Pressure Reduction, Discovery of Condition, Schedule for Evaluation and Remediation, and Special Requirements for Scheduling Remediation (including immediate, 60-Day and 180-Day repair conditions) to ensure anomalies and conditions are properly identified and repaired. This was not in place in 2010.	1. Brian Rankin	1. Complete
3	49 CFR 195.452 (f)(4)	IA RECORD Question #8 for Repair Criteria - Categorization of Defects	(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program: (4) Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis (see paragraph (h) of this section).	Records did not demonstrate that Tidewater categorized anomalies in accordance with 195.452(h)(4). The MFL tool discovery was August 11, 2010, and with a gouge measuring 48% wall loss was not remediated until May 25, 2011.	1. In 2014 Tidewater added procedures to the Integrity Management program outlining requirements for Temporary and Long-Term Pressure Reduction, Discovery of Condition, Schedule for Evaluation and Remediation, and Special Requirements for Scheduling Remediation (including immediate, 60-Day and 180-Day repair conditions) to ensure anomalies and conditions are properly identified and repaired. This was not in place in 2010.	1. Brian Rankin	1. Complete
4	49 CFR 195.452 (h)(3)	IA RECORD Question for #10 for Repair Criteria - IM Schedule	(h) What actions must an operator take to address integrity issues? (3) Schedule for evaluation and remediation. An operator must complete remediation of a condition according to a schedule prioritizing the conditions for evaluation and remediation. If an operator cannot meet the schedule for any condition, the operator must explain the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety or environmental protection.	Tidewater records did not provide justification for a gouge with 48% metal loss that was not repaired in 180 days.	1. In 2014 Tidewater added procedures to the Integrity Management program outlining requirements for Schedule for Evaluation and Remediation, and Special Requirements for Scheduling Remediation (including immediate, 60-Day and 180-Day repair conditions) to ensure anomalies and conditions are properly identified and repaired. As part of the Schedule for Evaluation and Remediation chapter the procedure is outlined for notifying PHMSA and UTC should the repair not be completed as scheduled in accordance with 49 CFR 195.452(m). This was not in place in 2010.	1. Brian Rankin	1. Complete
5	49 CFR 195.452 (h)(1), (4)	IA PROCEDURE Question #9 for Repair Criteria - Pressure Reduction	(h) What actions must an operator take to address integrity issues? (1) General requirements. An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with 195.422 when making a repair. (4) Special requirements for scheduling remediation - (i) Immediate repair conditions. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formula in Section 451.6.2.2 (b) of ANSI/ASME B31.4 (incorporated by reference see 195.3).	Tidewater's procedure (IMP Manual Section 1.2) does not specify a reduction in normal operating pressure when immediate repair conditions are discovered.	1. Section 1.2 of the Integrity Management Plan currently reads "To maintain safety, the operating pressure shall be either temporarily reduced or shut down until a repair is completed of the conditions listed in Table 1-1 of this section." Tidewater will remove the words "of this section" and add "(Immediate Repair Conditions)" as Table 1-1 outlines Immediate Repair Conditions.	1. Brian Rankin	1. 1/15/2015

6	49 CFR 195.452 (f)(3)	IA PROCEDURE Question #6 for In-Line Inspection - IMP Assessment Methods	(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect the operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program: (3) An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure;	Tidewater IMP procedure (IMP Manual Section 3.3) needs to identify all potential threats to the Burlington Northern Railroad (BNRR) pipeline including shorted casing, ground fault from AC current, train derailment, etc.	1. Tidewater will add the identified items to the risk review as part of the annual review.	1. Brian Rankin	1. 1/31/2015
7	49 CFR 195.452 (f)(4)	IA PROCEDURE Question #10 for In-Line Inspection - Validation of ILI Results	(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect the operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program: (4) Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis.	Tidewater IMP procedure (IMP Manual Section 7.3) does not provide a process for validating tool performance to guarantee the tool performance criteria were met.	1. Working with a third-party consultant (Willbros), Tidewater will develop process/criteria for validating tool performance to guarantee performance criteria were met. 2. Tidewater will include the process for validating tool performance to guarantee the tool performance criteria were met in IMP Manual Section 7.3.	1. Ron McClary 2. Brian Rankin	1. 12/31/2014 2. 1/15/2015
8	49 CFR 195.452 (j)(1), (5)(i)	IA PROCEDURE Question #14 for In-Line - ILI Acceptance Criteria	(j) What is a continual process of evaluation and assessment to maintain a pipeline's integrity? - (1) General. After completing the baseline integrity assessment, an operator must continue to assess the line pipe at specified intervals and periodically evaluate the integrity of each pipeline segment that could affect a high consequence area. (5) Assessment methods. An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies. (i) Internal inspection tool or tools capable of detecting corrosion and deformation anomalies including dents, gouges and grooves;	Tidewater IMP procedure does not include acceptance criteria for a successful ILI run such as: missing data, lost sensor channels, distance inaccuracy, velocity overruns or under runs, and physical damage to the sensors.	1. Working with a third-party consultant (Willbros), Tidewater will determine and define acceptance criteria for a successful ILI run including, but not limited to: missing data, lost sensor channels, distance inaccuracy, velocity over and under runs, and physical damage to the sensors. 2. Tidewater will include these criteria in Section 7.3 of the IMP Manual and specify that this information shall be included in the records of all future ILI runs.	1. Ron McClary 2. Brian Rankin	1. 12/31/2014 2. 1/15/2015
9	49 CFR 195.452 (c)(1)(i)(A)	IA RECORD Question #15 for In-Line Inspection - ILI Acceptance Criteria	(c) What must be in the baseline assessment plan? (1) An operator must include each of the following elements in its written baseline assessment plan: (i) The methods selected to assess the integrity of the line pipe. An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies. (A) Internal inspection tool or tools capable of detecting corrosion and deformation anomalies including dents, gouges and grooves:	Tidewater records did not include ILI tool acceptance criteria for evaluating vendor's data including physical damage to the sensors, lost sensor channels during data collection, distance inaccuracy, velocity over runs or under runs, etc.	1. Working with a third-party consultant (Willbros), Tidewater will determine and define acceptance criteria for a successful ILI run including, but not limited to: missing data, lost sensor channels, distance inaccuracy, velocity over and under runs, and physical damage to the sensors. 2. Tidewater will include these criteria in Section 7.3 of the IMP Manual and specify that this information shall be included in the records of all future ILI runs.	1. Ron McClary 2. Brian Rankin	1. 12/31/2014 2. 1/15/2015
10	49 CFR 195.452 (l)(1)(ii)	IA RECORD Question #16 for In-Line Inspection - Quality of ILI Data Analysis	(l) What records must be kept? (1) An operator must maintain for review during an inspection: (ii) Documents to support the decisions and analysis, including any modifications, justifications, variances, deviations and determinations made, and actions taken, to implement and evaluate each element of the integrity management program listed in paragraph (f) of this section.	Tidewater records did not include information to demonstrate the accuracy of the ILI tool run.	1. Working with a third-party consultant (Willbros), Tidewater will determine what information is needed/required to demonstrate the accuracy of future ILI tool runs. 2. Tidewater will add to section 7.3 of the IMP that ILI records shall include information to demonstrate the accuracy of the ILI tool run. This information shall be communicated to the vendors and noted in the records of all future ILI runs.	1. Ron McClary 2. Brian Rankin	1. 12/31/2014 2. 1/15/2015
11	49 CFR 195.452 (b)(6)	IA RECORD Question #19 for In-Line Inspection - Industry Practices	(b) What program and practices must operators use to manage pipeline integrity? Each operator of a pipeline covered by this section must: (6) Follow recognized industry practices in carrying out this section,.....	Tidewater records did not include any reference to recognized industry practice standards that the ILI vendor used such as API 1160, NACE SP0502 or NACE RP0102.	1. Tidewater will add to Section 7.3 of the IMP that all ILI activities shall be done in accordance with an recognized industry standard such as API 1160, NACE SP0502 or NACE RP0102 and that this shall be communicated to the vendors and noted and referenced in the records of all future ILI runs.	1. Brian Rankin	1. 1/15/2015
12	49 CFR 195.452 (f)(3)	IA PROCEDURE Question #12 for Repair Methods & Practices - Crack Repair Criteria	(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect the operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program: (3) An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure (see paragraph (g) of this section);	Tidewater's procedure (IMP Manual Section 1.6) does not exclude SCC as a threat or include remedial actions for SCC. Data is not gathered to evaluate potential threats whenever the pipeline is exposed.	1. Tidewater has instituted a policy that whenever pipeline is exposed an evaluation will be conducted for SCC conditions (typically black on white magnetic particle testing). To date Tidewater has conducted five evaluations on four different pipelines with no results (installation dates ranging from 1983 to 2000). To date no indications of SCC were found. 2. Tidewater will add this policy of evaluation to section 1.6 of the Integrity Management Program as well as our Exposed Pipe Inspection Procedure (located in Appendix 500C of the Pipeline Operations and Maintenance Manual) . 3. Using the results of the evaluation, as well as other information, Tidewater will re-evaluate the risk of SCC as part of its annual risk assessment as part of the continuing evaluation and assessment.	1. Ron McClary 2. Brian Rankin 3. Ron McClary	1. Complete 2. 1/15/2015 3. 1/31/2015

13	49 CFR 195.452 (g)	IA RECORD Question #13 for Repair Methods & Practices - Crack Repair Criteria	(g) What is an information analysis? In periodically evaluating the integrity of each pipeline segment (paragraph (j) of this section), an operator must analyze all available information about the integrity of the entire pipeline and the consequences of a failure.	Tidewater does not have records for excluding SCC as a threat or for evaluating the exposed pipeline for the threat of SCC.	<p>1. Tidewater has instituted a policy that whenever pipeline is exposed an evaluation will be conducted for SCC conditions (typically black on white magnetic particle testing). To date Tidewater has conducted five evaluations on four different pipelines with no results (installation dates ranging from 1983 to 2000). To date no indications of SCC were found.</p> <p>2. Tidewater will add this policy of evaluation to section 1.6 of the Integrity Management Program as well as our Exposed Pipe Inspection Procedure (located in Appendix 500C of the Pipeline Operations and Maintenance Manual).</p> <p>3. Using the results of the evaluation, as well as other information, Tidewater will re-evaluate the risk of SCC as part of its annual risk assessment as part of the continuing evaluation and assessment.</p>	<p>1. Ron McClary 2. Brian Rankin 3. Ron McClary</p>	<p>1. Complete 2. 1/15/2015 3. 1/31/2015</p>
14	49 CFR 195.452 (f)(4)	IA PROCEDURE Question #14 for Repair Methods & Practices - NDE for Cracks	(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect the operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program: (4) Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis (see paragraph (h) of this section).	Tidewater does not have a procedure for evaluating the exposed pipeline for the threat of crack like features or SCC.	<p>1. Tidewater has instituted a policy that whenever pipeline is exposed an evaluation will be conducted for SCC conditions (typically black on white magnetic particle testing). To date Tidewater has conducted five evaluations on four different pipelines with no results (installation dates ranging from 1983 to 2000). To date no indications of SCC were found.</p> <p>2. Tidewater will add this policy of evaluation to section 1.6 of the Integrity Management Program as well as our Exposed Pipe Inspection Procedure (located in Appendix 500C of the Pipeline Operations and Maintenance Manual).</p> <p>3. Using the results of the evaluation, as well as other information, Tidewater will re-evaluate the risk of SCC as part of its annual risk assessment as part of the continuing evaluation and assessment.</p>	<p>1. Ron McClary 2. Brian Rankin 3. Ron McClary</p>	<p>1. Complete 2. 1/15/2015 3. 1/31/2015</p>
15	49 CFR 195.452 (l)(1)(ii)	IA RECORD Question #15 for Repair Methods & Practices - NDE for Cracks	(l) What records must be kept? (1) An operator must maintain for review during an inspection: (ii) Documents to support the decisions and analysis, including any modifications, justifications, variances, deviations and determinations made, and actions taken, to implement and evaluate each element of the integrity management program listed in paragraph (f) of this section.	Tidewater does not have records for evaluating the exposed pipeline for the threat of crack like features or SCC. Tidewater has not provided evidence to eliminate SCC as a threat. SCC needs to be assumed as a threat until Tidewater provides evidence to the contrary.	<p>1. Tidewater has instituted a policy that whenever pipeline is exposed an evaluation will be conducted for SCC conditions (typically black on white magnetic particle testing). To date Tidewater has conducted five evaluations on four different pipelines with no results (installation dates ranging from 1983 to 2000). To date no indications of SCC were found.</p> <p>2. Tidewater will add this policy of evaluation to section 1.6 of the Integrity Management Program as well as our Exposed Pipe Inspection Procedure (located in Appendix 500C of the Pipeline Operations and Maintenance Manual).</p> <p>3. Using the results of the evaluation, as well as other information, Tidewater will re-evaluate the risk of SCC as part of its annual risk assessment as part of the continuing evaluation and assessment.</p>	<p>1. Ron McClary 2. Brian Rankin 3. Ron McClary</p>	<p>1. Complete 2. 1/15/2015 3. 1/31/2015</p>
16	49 CFR 195.452 (j)(5)	IA RECORD Question #6 for Continual Evaluation & Assessment	(j) What is a continual process of evaluation and assessment to maintain a pipeline's integrity? - (5) Assessment methods. An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies.	Tidewater does not have records to determine if their pipelines are susceptible to cracks, SCC or has exhibited crack-like features. If the threat of SCC has not been determined, it needs to be assumed that SCC is a threat. If SCC is a threat, an appropriate assessment must be done.	<p>1. Tidewater has instituted a policy that whenever pipeline is exposed an evaluation will be conducted for SCC conditions (typically black on white magnetic particle testing). To date Tidewater has conducted five evaluations on four different pipelines with no results (installation dates ranging from 1983 to 2000). To date no indications of SCC were found.</p> <p>2. Tidewater will add this policy of evaluation to section 1.6 of the Integrity Management Program as well as our Exposed Pipe Inspection Procedure (located in Appendix 500C of the Pipeline Operations and Maintenance Manual).</p> <p>3. Using the results of the evaluation, as well as other information, Tidewater will re-evaluate the risk of SCC as part of its annual risk assessment as part of the continuing evaluation and assessment.</p>	<p>1. Ron McClary 2. Brian Rankin 3. Ron McClary</p>	<p>1. Complete 2. 12/31/2014 3. 1/31/2015</p>

17	49 CFR 195.452 (f)(1)	IA PROCEDURE Question #13 for HCA Air Dispersion Analysis	(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect the operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program: (1) A process for identifying which pipeline segments could affect a high consequence area;	Tidewater does not have a procedure for air dispersion analysis for volatile liquid vapor release scenarios.	1. Tidewater will perform an air dispersion analysis and incorporate the analysis into the applicable Integrated Contingency Plan(s). This analysis has been included into the 2015 budget.	1. Stephanie Kranz	1. 3/31/2015
18	49 CFR 195.452 (f)(1)	IA RECORD Question #14 for HCA Air Dispersion Analysis	(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect the operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program: (1) A process for identifying which pipeline segments could affect a high consequence area;	Tidewater has not developed records of air analysis for dispersion of volatile liquid vapor releases.	1. Tidewater will perform an air dispersion analysis and incorporate the analysis into the applicable Integrated Contingency Plan(s). This analysis has been included into the 2015 budget.	1. Stephanie Kranz	1. 3/31/2015
19	49 CFR 195.452 (i)(2)	IA PROCEDURE Question #6 for Preventive & Mitigative Measures - Decision Basis	(i) What preventive and mitigative measures must an operator take to protect the high consequence area? (2) Risk analysis criteria. In identifying the need for additional preventive and mitigative measures, an operator must evaluate the likelihood of a pipeline release occurring and how a release could affect the high consequence area. This determination must consider all relevant risk factors.....	Tidewater procedure (IMP Manual Section 3.0) needs to consider input from operations, maintenance, engineering, and corrosion control to be considered in decision-making process.	1. Tidewater will add requirements for Operations Management, Maintenance, Engineering, and Corrosion Control to participate in the annual risk review as well as any new risk assessment that may occur in the future to Section 3.0 of the IMP.	1. Brian Rankin	1. 1/15/2015
20	49 CFR 195.452 (i)(2)	IA RECORD Question #7 for Preventive & Mitigative Measures - Decision Basis	(i) What preventive and mitigative measures must an operator take to protect the high consequence area? (2) Risk analysis criteria. In identifying the need for additional preventive and mitigative measures, an operator must evaluate the likelihood of a pipeline release occurring and how a release could affect the high consequence area. This determination must consider all relevant risk factors.....	Tidewater needs to develop records of input from operations, maintenance, engineering, and corrosion control to be considered in decision-making process.	1. Tidewater will add requirements for Operations Management, Maintenance, Engineering, and Corrosion Control to participate in the annual risk review as well as any new risk assessment that may occur in the future to Section 3.0 of the IMP.	1. Brian Rankin	1. 1/15/2015
21	49 CFR 195.452(g)	IA PROCEDURE Question #3 for Risk Analysis - SCC Risk	(g) What is an information analysis? In periodically evaluating the integrity of each pipeline segment (paragraph (j) of this section), an operator must analyze all available information about the integrity of the entire pipeline and the consequences of a failure.	Tidewater does not have a procedure for assessment processes to determine if SCC is a threat on the pipeline. Records do not eliminate SCC as a threat.	1. Tidewater has instituted a policy that whenever pipeline is exposed an evaluation will be conducted for SCC conditions (typically black on white magnetic particle testing). To date Tidewater has conducted five evaluations on four different pipelines with no results (installation dates ranging from 1983 to 2000). To date no indications of SCC were found. 2. Tidewater will add this policy of evaluation to section 1.6 of the Integrity Management Program as well as our Exposed Pipe Inspection Procedure (located in Appendix 500C of the Pipeline Operations and Maintenance Manual) . 3. Tidewater will add SCC as an issue to be considered during pipeline risk assessments in Table 3-1. 3. Using the results of the evaluation, as well as other information, Tidewater will re-evaluate the risk of SCC as part of its annual risk assessment as part of the continuing evaluation and assessment.	1. Ron McClary 2. Brian Rankin 3. Brian Rankin 3. Ron McClary	1. Complete 2. 12/31/2014 3. 12/31/2014 3. 1/31/2015
22	49 CFR 195.452(g)	IA RECORD Question #4 for Risk Analysis - SCC Risk	(g) What is an information analysis? In periodically evaluating the integrity of each pipeline segment (paragraph (j) of this section), an operator must analyze all available information about the integrity of the entire pipeline and the consequences of a failure.	The SCC threat has not been incorporated into Tidewater's risk assessment. Tidewater has not determined whether SCC is a threat to the system.	1. Tidewater has instituted a policy that whenever pipeline is exposed an evaluation will be conducted for SCC conditions (typically black on white magnetic particle testing). To date Tidewater has conducted five evaluations on four different pipelines with no results (installation dates ranging from 1983 to 2000). To date no indications of SCC were found. 2. Tidewater will add this policy of evaluation to section 1.6 of the Integrity Management Program as well as our Exposed Pipe Inspection Procedure (located in Appendix 500C of the Pipeline Operations and Maintenance Manual) . 3. Tidewater will add SCC as an issue to be considered during pipeline risk assessments in Table 3-1. 3. Using the results of the evaluation, as well as other information, Tidewater will re-evaluate the risk of SCC as part of its annual risk assessment as part of the continuing evaluation and assessment.	1. Ron McClary 2. Brian Rankin 3. Brian Rankin 3. Ron McClary	1. Complete 2. 1/15/2015 3. 1/15/2015 3. 1/31/2015