

**Utilities and Transportation Commission**  
**Standard Inspection Report for Intrastate Hazardous Liquid Systems**  
**Records Review and Field Inspection**

S – Satisfactory    U – Unsatisfactory    N/A – Not Applicable    N/C – Not Checked  
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Inspection Checklist, Cover Letter and Field Report, IMP and OQ Field Validation Forms** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
<b>Inspection ID/ Docket Number</b>	5845		
<b>Inspector Name &amp; Submit Date</b>	Dave Cullom 6/25/14		
<b>Chief Engineer Name &amp; Review Date</b>	Joe Subsits, 7/1/2014		
Operator Information			
<b>Name of Operator:</b>	Swissport Fueling Inc	<b>OPID #:</b>	32517
<b>Name of Unit(s):</b>	SeaTac Fuel Facilities LLC, 2350 S. 190th Seattle, WA		
<b>Records Location:</b>	Seattle--Seatac Airport		
<b>Date(s) of Last Review:</b>	3/19-3/21/2012	<b>Inspection Date</b>	June 3-4, 2014

**Inspection Summary:**  
 This inspection consisted of a records and field review of T-115, and associated regulated line pipe. I followed up on several previous findings to ensure they were resolved. Specifically, I did verify that Swissport blind flanged their internal plant piping to prevent any other tanks from being used to relieve surge or to store product for continued transportation. This was one of several action items I checked from our last 2012 standard audit. I also looked at the over pressure protection equipment records that are being maintained and tested Olympic to ensure they are being serviced at the required interval. There was difficulty obtaining records by the operator (Swissport) from Olympic to demonstrate compliance for the annual relief testing, but we were eventually able to obtain and review these records. The CP issues have been resolved, but the 100mV shift has to be used in some cases to demonstrate adequate polarization.

Issues – Item of Concern

The operator does need to review and follow API 653 recommendations or justify why the recommendation is not necessary..

<b>HQ Address:</b> 42025 Aviation Dr Suite 350 Dulles, VA 20166		<b>System/Unit Address:</b> SeaTac Fuel Facilities LLC 2350 S 190 <sup>th</sup> St Seattle, WA 98188	
<b>Co. Official:</b>	Mark Norris	<b>Phone No.:</b>	703-742-4319
<b>Phone No.:</b>	703-742-4319	<b>Fax No.:</b>	703-661-3984
<b>Fax No.:</b>	703-661-3984	<b>Emergency Phone No.:</b>	206-499-8687
<b>Emergency Phone No.:</b>	206-499-8687		
Persons Interviewed	Title	Phone No.	
Jennifer Morrow	Operations Supervisor	(360) 246-0407	
Nestor Soriano	Operations Manager	(206) 849-9692	
Dean Williams	General Manager	(206) 246-0407	

**UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since**

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<b>the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.</b>		
(check one below and enter appropriate date)		
Team inspection was performed (Within the past five years.) or,	Date:	
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	2009

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
<b>Subparts A - C</b>	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

**Comments:**

RECORDS REVIEW			S	U	NA	NC
<b>CONVERSION TO SERVICE</b>						
1.	195.5(a)(2)	All aboveground segments of the pipeline, and appropriately selected underground segments must be visually inspected for physical defects and operating conditions which reasonably could be expected to impair the strength or tightness of the pipeline.			X	
2.	195.5(c)	Pipeline Records (Life of System)			X	
3.		Pipeline Investigations			X	
4.		Pipeline Testing			X	
5.		Pipeline Repairs			X	
6.		Pipeline Replacements			X	
7.		Pipeline Alterations			X	
<b>REGULATED RURAL GATHERING LINES</b>			S	U	NA	NC
8.	195.11(a)	Operator has identified pipelines that are Regulated Rural Gathering Lines that meet all of the following criteria: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter from 6 5/8 inches to 8 5/8 inches; (2) located in or within one-quarter mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
9.	195.11(b)	Operator has prepared written procedures to carry out the requirements of <b>195.11</b> . (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> <li>• Subpart B Reporting</li> <li>• Corrosion Control</li> <li>• Damage Prevention</li> <li>• Public Awareness</li> <li>• Establish MAOP</li> <li>• Line Markers</li> <li>• Operator Qualification</li> </ul>			X	
10.	195.11(c)	If a new USA is identified after July 3, 2008, the operator must implement the requirements in paragraphs (b)(2 - 8), and (b)(11) for affected pipelines within 6 months of identification. For steel pipelines, comply with the deadlines in paragraphs (b)(9 & 10).			X	

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<b>11.</b>	<b>195.11(d)</b>	<p>Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <p>(1) Segment identification records required in paragraph (b)(1) of this section and the records required to comply with (b)(10) of this section, for the life of the pipe.</p> <p>(2) Records necessary to demonstrate compliance (b)(2 – 9 &amp; 11) of this section according to the record retention requirements of the referenced section or subpart.</p>			X	
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**Comments:**  
1-11 No conversion to service or rural gathering lines.

<b>LOW-STRESS PIPELINES IN RURAL AREA</b>			<b>S</b>	<b>U</b>	<b>NA</b>	<b>NC</b>
<b>12.</b>	<b>195.12(a)</b>	<p>Operator has identified pipelines that are Regulated Low-stress Pipelines in Rural Areas that meet all of the following criteria: (except for those already covered by 49 CFR 195) (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <p>(1) nominal diameter of 8 5/8 inches or more;</p> <p>(2) located in or within one-half mile of a USA</p> <p>(3) operates at an MOP established under §195.406 that is:</p> <p style="margin-left: 20px;">(i) greater than 20% SMYS; or</p> <p style="margin-left: 20px;">(ii) if the stress level is unknown, or not steel; &gt; 125 psig.</p>			X	
<b>13.</b>	<b>195.12(b)</b>	<p>Operator has prepared written procedures to carry out the requirements of <b>195.12.</b> (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <ul style="list-style-type: none"> <li>• Subpart B Reporting</li> <li>• Establish Integrity Management Plan</li> <li>• All Part 195 Safety Requirements</li> </ul>			X	
<b>14.</b>	<b>195.12 (c)(1)</b>	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).			X	
<b>15.</b>	<b>195.12(d)</b>	If, after July 3, 2008, a new USA is identified, the operator must implement the requirements in paragraphs (b)(2)(i) for affected pipelines within 12 months of identification. (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			X	
<b>16.</b>	<b>195.12(d)</b>	<p>Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).</p> <p>(1) Segment identification records required in paragraph (b)(1) for the life of the pipeline.</p> <p>(2) Records necessary to demonstrate compliance (b)(2 – 4) according to the record retention requirements of the referenced section or subpart.</p>			X	

**Comments:**  
12-16 No low stress pipelines in a rural area

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REPORTING						
17.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	<b>Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002</b>	X			
		Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted? <b>***Notes – The first submission was in 2014***</b>				
18.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	X			
19.	195.48/.49	Complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year for each commodity, and each state a pipeline traverses by June 15 of each calendar year. <b>*****Notes – The 2013 report was sent March 4<sup>th</sup> 2014****</b>	X			
20.	195.52	Immediate notice to NRC (800) 424-8802, or electronically at <a href="http://www.nrc.uscg.mil">http://www.nrc.uscg.mil</a> , of certain events, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. (Amdt. 195-95, 75 FR 72878, November 26, 2010, eff. 1/1/2011). <b>***Notes – Spill calculation in Appendix T and the NRC reference is in their spill contingency plan.***</b>	X			
21.	195.54(a)	Accident Report - file as soon as practicable, but no later than 30 days after discovery. Submittal must be electronically to <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> (Amdt. 195-95, 75 FR 72878, November 26, 2010) <b>***Notes – None***</b>				X
22.	195.54 (b)	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) <b>***Notes – None***</b>				X
23.	195.56(a)	SRC Report is required to be filed within five (5) working days of the determination and within ten (10) working days after discovery 195.56(a) (195.55(a)) <b>***Notes – Chapter 11 pg 19****</b>	X			
24.	195.56(b)	SRC Report requirements, including corrective actions (taken and planned) <b>***Notes – Chapter 11 pg 19****</b>	X			
25.	195.57	Do records indicate reports were submitted within 60 days of completing inspection of underwater pipelines? 195.413(a) (195.57) <b>***Notes – None***</b>				X
26.	195.59	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? <b>***Notes – None***</b>				X
27.	195.64	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> (Amdt. 195-95, 75 FR 72878, Nov.26, 2010, eff. 1/1/2011).	X			
28.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction <b>***Notes – No construction during this inspection time period.***</b>				X
29.	480-75-620	Was MOP changed based on hydrotest? Report submitted? <b>***Notes – None ***</b>				X
30.	480-75-630(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours of discovery) for events which results in; a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection. <b>***Notes – None ***</b>				X

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31.	480-75-630(2)	Written reports to the commission within 30 calendar days of the incident. The report must include the following: a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; (b) The extent of injuries and damage; (c) A description of the incident including date, time, and place; (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident; (e) The date and time the pipeline returns to safe operations; and (f) The date, time, and type of any temporary or permanent repair. <b>***Notes – None ***</b>			X	
32.	480-75-630(3)	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline. <b>***Notes – None ***</b>			X	
33.	480-75-630(4)	<b>Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission’s Virtual DIRT system or on-line damage reporting form)				
34.	480-75-630(4)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) <b>***Notes – None ***</b>			X	
35.	480-75-630(4)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed? <b>***Notes – None ***</b>			X	
36.	480-75-630(4)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? <b>Note:</b> Records maintained for two years and made available to the commission upon request. <b>***Notes – None ***</b>			X	
37.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities?				
38.	480-75-630(5)(a)	<ul style="list-style-type: none"> <li>Notification requirements for excavators under RCW 19.122.050(1) <b>***Notes – None ***</b></li> </ul>			X	
39.	480-75-630(5)(b)	<ul style="list-style-type: none"> <li>A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and <b>***Notes – None ***</b></li> </ul>			X	
40.	480-75-630(5)(c)	<ul style="list-style-type: none"> <li>Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. <b>***Notes – None ***</b></li> </ul>			X	
41.	480-75-630(6)	<b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b> <ul style="list-style-type: none"> <li>An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (630(6)(a)</li> <li>A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b) <b>***Notes – None ***</b></li> </ul>			X	

**Comments:**

CONSTRUCTION			S	U	NA	NC
42.	195.204	Construction Training/Qualification records including personnel who conduct visual inspections (e.g. inspectors of welds)			X	
43.	195.214(b)	Detailed Test Results to Qualify Welding Procedures and Qualifying tests			X	

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44.	195.222(a)	Welders must be qualified in accordance with <b>Section 6 of API Standard 1104 (20<sup>th</sup> edition 2005, including errata/addendum 7/2007 and errata 2 12/2008) or Section IX of the ASME Boiler and Pressure Vessel Code (2007 edition, July 1, 2007)</b> , except that a welder qualified under an earlier edition than currently listed in <b>195.3</b> may weld, but may not requalify under that earlier edition. (Amdt 195-94 Pub. 8/11/10 eff. 10/01/10).			X	
45.	195.222(b)	Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has (1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 9 of API 1104.			X	
46.	195.226(a)	Arc burns must be repaired.			X	
47.	195.226(b)	If a notch is not repairable by grinding, a cylinder of the pipe containing the entire notch must be removed. Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? ( <b>Ammonium Persulfate</b> ).			X	
48.	195.226(c)	The ground wire may not be welded to the pipe/fitting being welded.			X	
49.	195.228/.234	Do procedures require welds to be nondestructively tested to ensure their acceptability according to <b>API 1104</b> and as per <b>195.228(b)</b> and per the requirements of <b>195.234</b> in regard to the number of welds to be tested?			X	
50.	195.234(b)	Nondestructive testing of welds performed: (1) In accordance with written procedures for <b>NDT</b> (2) By qualified personnel (3) By a process that will indicate any defects that may affect the integrity of the weld			X	
51.	195.234(d) 195.266(a)	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?			X	
52.	195.234(e) 195.266(a)	Do records demonstrate all girth welds installed each day in selected locations specified in §195.234(e) are nondestructively tested over their entire circumference?			X	
53.	195.234(f) 195.266(a)	Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?			X	
54.	195.234(g) 195.266(a)	Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?			X	
55.	195.266	Construction Records maintained for life of pipeline				
56.	195.266(b)	Amount, Location, Cover of each Size of Pipe Installed			X	
57.	195.266(c)	Location of each Crossing with another Pipeline			X	
58.	195.266(d)	Location of each buried Utility Crossing			X	
59.	195.266(e)	Location of Overhead Crossings			X	
60.	195.266(f)	Location of each Valve and Test Station			X	
<b>PRESSURE TESTING</b>			<b>S</b>	<b>U</b>	<b>NA</b>	<b>NC</b>
61.	195.302(a)	Pipelines, and each pipeline segment that has been relocated, replaced, or otherwise changed, must be pressure tested without leakage (see .302(b), .303, and .305(b) for exceptions).			X	

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62.	195.302(b)/ .302(c)	<p>Except for lines converted under <b>§195.5</b>, the following pipelines <i>may</i> be operated without having been pressure tested per Subpart E and without having established MOP under <b>195.406(a)(5)</b> [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure].</p> <ul style="list-style-type: none"> <li>- .302(b)(2)(ii): Any carbon dioxide pipeline constructed before July 12, 1991, that is located in a rural area as part of a production field distribution system.</li> <li>- .302(b)(3): Any low-stress pipeline constructed before August 11, 1994, that does not transport HVL.</li> <li>- .302(b)(4)/.303: Those portions of older hazardous liquid and carbon dioxide pipelines for which an operator has elected the risk-based alternative under §195.303 and which are not required to be tested based on the risk-based criteria.</li> </ul> <p><i>Note: (An operator that elected to follow a risk-based alternative must have developed plans that included the method of testing and a schedule for the testing by December 7, 1998. The compliance deadlines for completion of testing are as shown in the table in §195.303, and in no case was testing to be completed later than 12/07/2004).</i></p>				
63.		Have all pipelines <u>other than those described above</u> been pressure tested per Subpart E?			X	
64.		If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under <b>195.406(a)(5)</b> , in accordance with <b>.302(c)</b> ?			X	
65.	195.304	Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required.			X	
66.	195.305(a)	<p>All pipe, all attached fittings, including components, must be pressure tested in accordance with <b>195.302</b>.</p> <p><b>Note:</b> A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory.</p>			X	
67.	195.305(b)	Manufacturer testing of components. Records available and adequate?			X	
68.	195.306	Appropriate test medium			X	
69.	195.308	Pipe associated with tie-ins pressure tested?			X	
70.	195.310(a)	Pipeline Test Records for useful life of facilities?			X	
71.	195.310(b)	Do test records required by paragraph (a) include:				
72.	195.310(b)(1)	Pressure recording charts			X	
73.	195.310(b)(2)	Test instrument calibration records			X	
74.	195.310(b)(3)	Name of operator, person responsible, test company used, if any			X	
75.	195.310(b)(4)	Date and time of test			X	
76.	195.310(b)(5)	Minimum test pressure			X	
77.	195.310(b)(6)	Test medium			X	
78.	195.310(b)(7)	Description of the facility tested and the apparatus			X	
79.	195.310(b)(8)	Explanation of any pressure discontinuities, including test failures that appear on the pressure recording charts.			X	
80.	195.310(b)(9)	Where elevation differences in the test section exceed <b>100 feet</b> , a profile of the elevation over the entire length of the test section must be included			X	
81.	195.310(b)(10)	Temperature of the test medium or pipe during the test period			X	

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Comments:  
**42-81 Notes – No construction, fabrication or pressure testing since at least the last two inspections.**

INTERNAL DESIGN PRESSURE PROCEDURES		S	U	NA	NC
.402(c)/.422	Internal design pressure for pipe in a pipeline is determined in accordance with the requirements of this section and the formula: $P = (2 St/D) \times E \times F$ . <b>.106 In Chapter 28, it has Barlow's formula.</b>	X			

OPERATION & MAINTENANCE		S	U	NA	NC
82.	<b>195.402(a)</b>	Annual Review of O&M Manual (1 per yr/15 months) ****Notes – Manual reviewed/revised several times in 2012, once in 2013, and 2014.****	X		
83.		Appropriate parts must be kept at locations where O&M activities are conducted ****Notes - In control room ****	X		
84.	<b>195.402(c)(4)</b>	Determination of Areas requiring immediate response for Failures or Malfunctions ****Notes- Section 8 of the spill plan has the response plans for small, medium, and large spills****	X		
85.	<b>195.402(c)(5)</b>	Pipeline accidents analyzed to determine their causes ***Notes – No accidents****			X
86.	<b>195.402(c)(10)</b>	Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards.  Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per <b>195.59</b> ****Notes – None of these types of tasks have been conducted****			X
87.	<b>195.402(c)(12)</b>	Establishment/Maintaining liaison with Fire, Police, and other Public Officials *****Notes - The local fire comes and drills every year*****	X		
88.	<b>195.402(c)(13)</b>	Periodic review of personnel work – effectiveness of normal O&M procedures and corrective action when deficiencies are found *****Notes – Every year they do a practical evaluation of CTs*****	X		
89.	<b>195.402(c)(15)</b>	Implementing the applicable control room management procedures required by <b>195.446</b> . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010) ****Update – I discussed with our chief via phone on 7/1/14 and it was determined that Swissport does not require a control room program. ****			X
90.	<b>195.402(e)(1)</b>	Records that indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures. ****Notes – No events*****			X
91.	<b>195.402(e)(2)</b>	Prompt and effective response to each type of emergency <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response ****Notes – No events*****			X
92.	<b>195.402(e)(7)</b>	Records indicating 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)? ****Notes – No accidents/responses, but they periodically do drill with local first responders.****	X		
93.	<b>195.402(e)(9)</b>	Post accident review of employees' activities to determine if procedures were effective and corrective action was taken? ****Notes – No events*****			X
94.	<b>195.402(e)(10)</b>	Actions to be taken by a controller during an emergency in accordance with <b>195.446</b> . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). *****Notes – Controllers all the way to operators have the training*****	X		

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95.	195.403(a)	Records of operator provided training to its emergency response personnel as required	X			
96.	195.403(b)(1)	Annual review with personnel on performance in meeting the objectives of the emergency response training program (1 per yr/15 months)	X			
97.	195.403(b)(2)	Make appropriate changes to the emergency response training program (1 per yr/15 months) ***Notes – Made changes about 5 years ago, no changes recently***	X			

**Comments:**

OPERATION & MAINTENANCE (Cont)			S	U	NA	NC
98.	195.403(c)	Verification of supervisor knowledge of emergency response procedures (1 per yr/15 months) *****Notes – They take tests every year – they are available, but are in storage*****	X			
99.	195.404(a)(1)	Maps and Records of the following facilities maintained and made available: i. Breakout tanks ii. Pump stations iii. Scraper and sphere facilities iv. Pipeline valves v. Facilities to which 195.402(c)(9) applies vi. Rights-of-way vii. Safety devices to which 195.428 applies *****Notes – In manuals and in the conference room on the wall*****	X			
100.	195.404(a)(2)	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines. *****Notes – No crossings of these types. It is in a terminal/tank farm*****			X	
101.	195.404(a)(3)	The maximum operating pressure of each pipeline in accordance with 195.406 *****Notes - Pg 34 Chapter 18 has this*****	X			
102.	195.404(a)(4)	The diameter, grade, type, and nominal wall thickness of all pipe.	X			
103.	195.404(b)(2) 195.402(d)(1)	Response to any emergency or abnormal operations applicable under 195.402 (maintained for at least 3yrs) as required by written procedures ***Notes – They have not have any instances during this inspection time period.*****			X	
104.	195.404(b) 195.402(d)(5)	Periodic review of personnel work – effectiveness of abnormal operation procedures/corrective action taken when deficiencies found.	X			
105.	195.404(c)(1)	The date, location, and description of each repair made on the pipe and maintain it for the life of the pipe. *****Notes – No T-115 repairs made during this inspection time period*****			X	
106.	195.404(c)(2)	The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least 1 year. *****Notes – Maintained for life*****	X			
107.	195.404(c)(3)	Each inspection and test required by Subpart F shall be maintained for at least 2 years, or until the next inspection or test is performed, whichever is longer. *****Notes – Maintained for life.*****	X			
108.	195.406(a)/ .406(a)(1)	Except for surge pressures and other variations from normal operations, no operator shall operate a pipeline above the MOP, and the MOP may not exceed any of the following; • The internal design pressure of the pipe determined by 195.106.	X			

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109.	480-75-620	Change in MOP? Changed based on hydrotest? ****Notes – None***			X	
110.	195.408(b)	Records indicating emergency communication system(s) use was as required ****Notes – None, but operated during exercises.*****			X	
111.	195.412(a)	Operator must inspect the right-of-way at intervals not exceeding <b>3 weeks</b> , but at least <b>26 times each calendar year</b>	X			
112.	195.412(b)	Records indicating ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed ***Notes – None – In a gated tank farm****			X	
113.	480-75-640	Depth of cover surveys and mitigation***Notes – None – In a gated tank farm****			X	
114.	195.420(b)	Mainline valves inspected to determine that it is functioning properly at intervals not exceeding <b>7½ months</b> , but at least <b>twice</b> each calendar year. ***Notes – None****			X	
115.	480-75-500	Pipe movement study per API 1117 ***Notes – No pipe moving or relocating has been done of in-service pipe****			X	
116.	195.428(a)	Insp. of overpressure safety devices ( <b>1 per yr/15 months non-HVL; 2 per yr/7½ months HVL</b> ) *****Pressure relief for T-115 100 psig Surge Relief Valve checked 2/26/14, 2/12/13. I was able to obtain the pressure testing records for The OPL 8 inch ANSI 150 system high pressure relief valve. The PRV was set to 150 psig. It was checked 2/28/14, 3/29/13, and 3/28/12 by OPL****	X			
117.	195.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE <b>5 yrs</b> ). ***Notes – None****			X	
118.	195.428(c)	Above ground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to section 5.1.2 of API Standard 2510. Amt. 195-86 Pub. 06/09/06 eff. 07/10/06.  Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 unless operator noted in procedures manual (195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank. ***Notes – None –No bullet tanks.****			X	
119.	195.428(d)	Inspection of Overfill Systems ( <b>1 per yr/15 months non-HVL; 2 per yr/7½ months HVL</b> )	X			
120.	480-75-300 (3)	Leak detection and alarm records ****Notes – A spill will make an alarm – sheen alarm in tank farm****	X			
121.	480-75-320	Surge analysis done? *****Notes – There is only several hundred feet of piping within the tank farm. The line pipe and tankage handles the surge of the SeaTac lateral. *****			X	
122.	195.430	Inspection of Fire Fighting Equipment ***Notes – They have quarterly, semi- annual, and annual checks****	X			
123.	195.432(c)	<b>Breakout Tanks:</b> Inspect the physical integrity of in-service steel aboveground breakout tanks built to <b>API Standard 2510</b> according to <b>Section 6 of API 510</b> . Amt. 195-86 Pub. 06/09/06 eff 07/10/06. <b>Note: For Break-out tank unit inspection, refer to Breakout Tank Form</b> ***Notes – None –No bullet tanks.****			X	

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<b>PUBLIC AWARENESS PROGRAM PROCEDURES</b> (In accordance with API RP 1162)			S	U	NA	NC	
<b>124.</b>	<b>195.440 (e &amp; f)</b>	<b>PUBLIC AWARENESS PROGRAM</b>				X	
		Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements – Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc). See table below.					
		Operators in existence on June 20, 2005, must have completed their written program no later than June 20, 2006					
		<b>API RP 1162 Baseline* Recommended Message Delivery Frequencies</b>					
		<b>Stakeholder Audience (Hazardous Liquid Operators)</b>					<b>Baseline Message Frequency (Starting from Effective Date of Plan)</b>
		Residence along right-of-way and Places of Congregation					2 Years
		Emergency Officials					Annual
		Public Officials					3 Years
		Excavator and Contractors					Annual
		One-Call Centers					As required of one-call center
* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, record keeping, program evaluation, etc.							
<b>125.</b>	<b>.440(g)</b>	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.				X	
<b>126.</b>	<b>.440(i)</b>	Records indicating that the continuing public education program evaluation process has been implemented and do records indicate that continuous improvement is being implemented				X	

**Comments:**  
 \*\*\*Notes 124-126 – The UTC inspected the program last year in 2013.\*\*\*\*\*

<b>DAMAGE PREVENTION PROGRAM</b>			S	U	NA	NC
<b>127.</b>	<b>195.442(a)</b>	Records indicating the damage prevention program is being carried out as written			X	
<b>128.</b>	<b>195.442(c)(1)</b>	List of Current Excavators			X	
<b>129.</b>	<b>195.442(c)(2)</b>	Notification of Public/Excavators			X	
<b>130.</b>	<b>195.442(c)(3)</b>	Notifications of planned excavations. (One -Call Records)			X	
<b>131.</b>	<b>195.442(c)(4)</b>	If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings.			X	
<b>132.</b>	<b>195.442(c)(5)</b>	Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.			X	
<b>133.</b>	<b>195.442(c)(6)</b>	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
<b>134.</b>		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline?			X	
<b>135.</b>		2. In the case of blasting, does the inspection include leakage surveys? (required)			X	

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136.		Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence?			X	
137.	<b>OPERATOR QUALIFICATION</b>					
138.	195.507(a) .507(b)	Are personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
139.	195.507(a) .507(b)	Are qualification records available for contractor personnel that contain the required elements?	X			

**Comments:**  
 \*\*\*Notes 127-136 – This system is entirely within a gated terminal with no public access.\*\*\*\*\*

<b>CPM SYSTEMS</b>			<b>S</b>	<b>U</b>	<b>NA</b>	<b>NC</b>
140.		Each CPM system employed on a pipeline segment should be fully described and the documentation readily available for reference by the users and by those employees responsible for the maintenance and support of the CPM system				
141.	195.444	a. General Information (this information is usually available as a part of normal Control Center information). b. A system map, profile and detailed physical description for each pipeline segment. c. A summary of the characteristics of each product transported.			X	
142.		<b>CPM Specific Information:</b>				
143.	195.444	a. A tabulation of the inputs used in the CPM procedure for each pipeline segment. b. A general description of the CPM outlining its principles of operation. c. A list of special considerations or step-by-step procedures to be used in evaluating CPM results and for requesting assistance with alarm evaluation, e.g., on-call support phone numbers where this systems is implemented.			X	
144.		d. Details of the expected performance of the leak detection system under normal and line upset conditions; and the effects of system degradation on the leak detection results. e. CPM pipeline controller training manuals or information. f. CPM alarm thresholds for the various applications.			X	

**Comments:**  
 \*\*\*Notes 124-126 –No CPM system.\*\*\*\*\*

<b>CORROSION CONTROL</b>			<b>S</b>	<b>U</b>	<b>NA</b>	<b>NC</b>
145.	195.589(c) 195.555	Supervisors maintain thorough knowledge of corrosion procedures. ***Notes – Dan Liss is Swissport's integrity manager. He is NACE Basic Corrosion, CP Intro, Theory and Interpretation. I talked to Jason Kadlec and Dan Liss about CP issues in a phone interview.***	X			

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146.	195.589(c) 195.567(c)	Test lead maintenance / Frequent enough intervals	X			
147.	480-75-510	Corrosion remediation within 90 days <b>****Notes – It is the manual Chapter XXVIII Section k****</b>	X			
148.	195.589(c) 195.569	Inspection of Exposed Buried Pipelines (External Corrosion)	X			
149.	195.589(c) 195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (1 per yr/15 months) <b>****Notes – Are they coming in October? Yes, and I asked Dan about the annual testing.****</b>	X			
150.	195.589(c) 195.573(a)(2)	Close Interval Surveys - when circumstances dictated a need for surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys? <b>****Notes – Not needed for such a small area of tankage pipe****</b>			X	
151.	195.589(c) 195.573(b)(1) & (2)	External Corrosion Control, Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/NTE 39 months) <b>***Notes – None****</b>			X	
152.	195.589(c) 195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers <b>***Notes – None****</b>			X	
153.	195.589(c) 195.573(e)	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?	X			
154.	195.589(c) 195.575(a-d)	Electrical isolation inspection, testing and monitoring (if applicable)	X			
155.	195.589(c) 195.577(a)	Testing for Interference Currents	X			
156.	195.589(c) 195.579(a)	Corrosive effects investigation <b>***Notes – None****</b>			X	
157.	195.589(c) 195.579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (2 per yr/NTE 7½ months) <b>***Notes – None****</b>			X	
158.	195.589(c) 195.579(b)(1-3)	Corrosion inhibitors used in sufficient quantities	X			
159.	195.589(c) 195.579(a)(c)	Inspection of Removed Pipe for Internal Corrosion <b>***Notes – No pipe removed during this inspection cycle.****</b>			X	
160.	195.589(c) 195.583(a-c)	Atmos. Corr. Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) <b>***Notes – 2012 and 2013 looked at. They look at it monthly****</b>	X			
161.	195.589(c) 195.585(a)	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG <b>***Notes – None****</b>			X	
162.	195.585(b)	Localized Corrosion Pitting – replace, repair, reduce MOP <b>***Notes – None****</b>			X	
163.	195.589(a)&(b) 195.563(a)	Cathodic Protection Do records document when cathodic protection was operational on constructed, relocated, replaced, or otherwise changed pipelines within the last 5 years? (Maps showing anode location, test stations, CP systems, protected pipelines, etc.)	X			

<b>Comments:</b>
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FIELD REVIEW			S	U	N/A	N/C
164.	195.262(a)	Has adequate ventilation been provided at pump station buildings?	X			
165.	195.262(a)	Have warning devices that warn of the presence of hazardous vapors been installed at new pump station buildings? <b>***Notes – No new pump station buildings****</b>			X	
166.	195.262(b)	Has a device for activating emergency shutdown of the pump station been installed? <b>***Notes – Not a pump station -****</b>			X	
167.	195.262(b)	If power is needed to actuate safety devices, has an auxiliary power supply been provided? <b>***Notes – No power needed - mechanical PSVs****</b>			X	

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FIELD REVIEW			S	U	N/A	N/C
168.	195.262(b)	Have safety devices been installed to prevent over-pressuring new or modified pumping equipment? <b>***Notes – No new construction***</b>			X	
169.	195.262(d)	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? <b>***Notes – None***</b>			X	
170.	195.262(e)	Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps?	X			
171.	195.302	Is pressure testing being adequately conducted? (.304, .305, .306, .307) <b>***Notes – No new construction***</b>			X	
172.	195.308	Pre-pressure Testing Pipe - Marking and Inventory <b>***Notes – No pretested pipe observed in the field.***</b>			X	
173.	195.402(c)(13)	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site. <b>***Notes – No new construction***</b>	X			
174.	195.403(c)	Supervisor Knowledge of Emergency Response Procedures	X			
175.	195.410	Are line markers placed and maintained as required? 195.410(a) (195.410(b); 195.410(c); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20) <b>***Notes – These regulated facilities are inside a secured terminal.***</b>			X	
176.	480-75-540	Markers at exposed areas <b>***Notes – These regulated facilities are inside a secured terminal.***</b>			X	
177.	195.412	Are the ROW conditions acceptable for the type of patrolling used? <b>***Notes – These regulated facilities are inside a secured terminal.***</b>			X	
178.	195.420 (a), (b)	Valve Maintenance & Operation	X			
179.	195.420(c)	Valve Protection from Unauthorized Operation and Vandalism <b>***Notes – These regulated facilities are inside a secured terminal.***</b>			X	
180.	195.426	Are launchers and receivers equipped with relief devices? <b>***Notes – I did not observe and launchers or receivers that were part of this inspection unit.***</b>			X	
181.	195.428(a)	Are inspections of overpressure safety devices adequate (including HVL lines)? ? <b>***Notes – We looked at records. OPL personnel were not on site to perform a field test.***</b>	X			
182.	195.428(a)	Do pressure control devices installed on HVL pressure breakout tanks appear to be in satisfactory mechanical condition and to be functioning properly? ? <b>***Notes – None.***</b>			X	
183.	195.428(c)	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.] ? <b>***Notes – T-115 was not built or altered after 2000***</b>			X	
184.	480-75-320	Relief Device set at or below MOP <b>****Notes - Swissport relief has 100lb fracture pins in it and I verified. MOP is 275 per the manual. The OPL relief has 150lb fracture pins in it per OPL's last three years inspection records provided to Swissport. ***</b>	X			

<b>Comments:</b>
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FIELD REVIEW (Cont)			S	U	N/A	N/C
185.	480-75-300	Leak Detection – 8% in 15 Minutes <b>****Notes – They have sheen alarms that will detect leaks at a much lower limit than 8% Also, this is process piping so leak detection is not required****</b>			X	

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186.	480-75-300	Leak detection at flow and no flow conditions****Notes – They have sheen alarms that will detect leaks at a much lower limit than 8% Also, this is process piping so leak detection is not required****			X	
187.	195.430	Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly? (195.430(a) (195.430(b); 195.430(c); 195.262(e))	X			
188.	195.432	Breakout Tanks	X			
189.	480-75-330	Do Breakout Tanks have independent overfill alarms?	X			
190.	195.434	Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?	X			
191.	195.436	Security - Pumping Stations - Breakout Tanks	X			
192.	195.438	Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?	X			
193.	195.446(a)	Is the SCADA display representative of the system configuration? 195.404(a) (195.505(f); 195.446(h))	X			
194.	195.446(b)	Do operating personnel know the MOP of respective pump stations and associated alarm settings?	X			
195.	195.446(h)	Do controllers demonstrate adequate skills and knowledge? 195.505(b) (195.446(g)(2)) **Notes – We will need to check this in a control room audit****				X
196.	195.501-195.509	<b>Important:</b> Per OPS, the OQ Field Inspection Protocol Form 15 shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database located at <a href="http://primis.phmsa.dot.gov/oqdb/home">http://primis.phmsa.dot.gov/oqdb/home</a> <b>Form Completed/Uploaded? Y/N Will do after Senior Engineer review</b>				
197.	195.571	Cathodic Protection (test station readings, other locations to ensure adequate CP levels)	X			
198.	195.573	Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?	X			
199.	195.575	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? 195.575(a) (195.575(b); 195.575(c); 195.575(d))	X			
200.	195.583	Atmospheric corrosion - Exposed pipeline components, (splash zones, water spans, soil/air interface, under thermal insulation, disbonded coatings, pipe supports, deck penetrations, etc.) 195.583(c) (195.581(a))	X			

<b>Comments:</b>

**Recent PHMSA Advisory Bulletins (Last 2 years)**

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-12-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations

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ADB-12-09	Oct 11, 12	Communication During Emergency Situations
ADB-12-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB -12-06	May 7, 12	Verification of Records Establishing MAOP and MOP.
ADB-12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB -12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>