

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			
Docket Number	Insp # 2623		
Inspector Name & Submit Date	Dennis Ritter/Al Jones March 29, 2012		
Chief Eng Name/Review/Date	J. Subsits 3/30/2012		
Operator Information			
Name of Operator:	Swissport Fueling Inc	OPID #:	32517
Name of Unit(s):	SeaTac Fuel Facilities LLC, 2350 S. 190 th Seattle, WA		
Records Location:	Seattle--Seatac Airport		
Date(s) of Last Review:	April 2009	Inspection Date	3/19-3/21/2012

<p>Inspection Summary:</p> <ul style="list-style-type: none"> Swissport requested a new OPID as a result of numerous facilities around the country. New OPID is 32517. Emergency valves and pressure relief is maintained by Olympic Pipeline and records were provided by Swissport. Swissport needs a written procedure to estimate hazardous liquid spill volumes should they occur. Swissport needs to obtain construction records from Olympic Pipeline for regulated pipeline facilities as necessary for operating the system. Swissport will need to have a control room inspection as operations are controlled remotely via a computer interface (not part of this standard inspection). Low CP read -0.682, on Cell 1 of Tank 115 tank bottom which is less than required -0.85 per Manual.

HQ Address: 42025 Aviation Dr Suite 350 Dulles, VA 20166		System/Unit Address: SeaTac Fuel Facilities LLC 2350 S 190 th St Seattle, WA 98188	
Co. Official:	Mark Norris	Phone No.:	(206) 246-0407
Phone No.:	(703) 742-4319	Fax No.:	(206) 246-0409
Fax No.:	(703) 742-4388	Emergency Phone No.:	(206) 988-4989
Emergency Phone No.:	(206) 499-8687		
Persons Interviewed	Title	Phone No.	
Nestor Soriano	QA/QC Supervisor	(206) 849-9692	
Rachel Drummond	Lead	206-419-9564	
Dean Williams	General Manager	206-246-0407	

UTC staff did not conduct an O&M procedures inspection as part of this Standard Inspection as the O&M was written in 2009. This checklist focuses on Records and Field items per a routine standard inspection.			
(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:	April 2009

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PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
Subparts A - C	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
CONVERSION TO SERVICE						
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	
REGULATED RURAL GATHERING LINES			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 195.11 . (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> • Subpart B Reporting • Corrosion Control • Damage Prevention • Public Awareness • Establish MAOP • Line Markers • Operator Qualification 			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). (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			X	
11.	195.11(d)	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (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. (2) Records necessary to demonstrate compliance (b)(2 – 9 & 11) of this section according to the record retention requirements of the referenced section or subpart.			X	

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Comments:
 1.-7 No conversions
 8.-11. No rural gathering lines

LOW-STRESS PIPELINES IN RURAL AREA		S	U	NA	NC	
12.	195.12(a)	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). (1) nominal diameter of 8 5/8 inches or more; (2) located in or within one-half 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
13.	1959.12(b)	Operator has prepared written procedures to carry out the requirements of 195.12. (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> • Subpart B Reporting • Establish Integrity Management Plan • All Part 195 Safety Requirements 				X
14.	195.12 (c)(1)	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).				X
15.	195.12(d)	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
16.	195.12(d)	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) for the life of the pipeline. (2) Records necessary to demonstrate compliance (b)(2 – 4) according to the record retention requirements of the referenced section or subpart.				X

Comments:
 12.-16. No low stress rural pipelins

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REPORTING						
17.	49 U.S.C. 60132, Subsection (b) ADB-08-07	Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to http://www.npms.phmsa.dot.gov/submission/to-review-existing-data-on-record . Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates.		X		
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? No pipes >250 psi			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. (NOTE: August 15, 2011 for the year 2010). (Amdt. 195-95, 75 FR 72877, November 26, 2010, eff. 1/1/2011). 8/29/2011	X			
20.	195.50	Accident report criteria, as detailed under 195.50. A release that results in, 5 gallons or more, death or personal injury necessitating hospitalization , an explosion or fire not intentionally set by the operator , or total estimated property damage including clean-up and product lost equaling \$50,000 or more. (Note: A release of less than 5 gals may still require reporting. See 195.50(b) and 195.52(a)(4) for additional requirements and exemptions for maintenance work under 5 BLS). No Spills			X	
21.	195.52	Immediate notice to NRC (800) 424-8802, or electronically at http://www.nrc.uscg.mil , 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). Swissport does not have a written procedure		X		
22.	195.54(a)	Accident Report - file as soon as practicable, but no later than 30 days after discovery. Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov (Amdt. 195-95, 75 FR 72878, November 26, 2010). No accidents			X	
23.	195.54 (b)	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) No supplemental required			X	
24.	195.55	Safety-related conditions (SRC) - criteria No safety related conditions			X	
25.	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 No SRC filed			X	
26.	195.56(b)	SRC Report requirements, including corrective actions (taken and planned) No SRC filed			X	
27.	195.58	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://opsweb.phmsa.dot.gov unless an alternative reporting method is authorized IAW with paragraph (d) of this section. (Amdt. 195-95, 75 FR 72878, Nov. 26, 2010, eff. 1/1/2011).	X			
28.	195.59	Abandoned Underwater Facility Reports No underwater facilities			X	
29.	195.64	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://opsweb.phmsa.dot.gov (Amdt. 195-95, 75 FR 72878, Nov.26, 2010, eff. 1/1/2011).	X			
30.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction No new construction			X	
31.	480-75-620	Was MOP changed based on hydrotest? Report submitted? No change in MOP			X	
32.	480-75-630(3)	24 hour notification for emergency shutdown, material defects or damage that impact service ability. None of these conditions apply since last inspection			X	

Comments:
17. Submission to NPMS-Swissport has not submitted any information to NPMS. They believed they were exempt due to the short length of pipe they operate.

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CONSTRUCTION			S	U	NA	NC
33.	195.204	Construction Inspector Training/Qualification			X	
34.	195.214(b)	Test Results to Qualify Welding Procedures			X	
35.	195.222(a)	Welders must be qualified in accordance with Section 6 of API Standard 1104 (20th edition 2007, including errata 2008) or Section IX of the ASME Boiler and Pressure Vessel Code (2007 edition, July 1, 2007) , except that a welder qualified under an earlier edition than currently listed in 195.3 may weld, but may not requalify under that earlier edition. (Amdt 195-94 Pub. 8/11/10 eff. 10/01/10).			X	
36.	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	
37.	Alert Notice 3/13/87	In the welding of repair sleeves and fittings, do the operator's procedures give consideration to the use of low hydrogen welding rods, cooling rate of the weld, metallurgy of the materials being welded (weldability carbon equivalent) and proper support of the pipe in the ditch?				
38.	195.226(a)	Arc burns must be repaired.			X	
39.	Alert Notice 3/24/10	In the welding of pipe and fittings, do the operator's procedures give consideration to girth weld bevels being properly transitioned and aligned, girth weld pipe ends meeting API 5L pipe end diameter and diameter out-of-roundness specifications, and API 1104 alignment and allowable "high-low" criteria, particularly in large diameter pipe (> 20" diameter)?			X	
40.	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? (Ammonium Persulfate).			X	
41.	195.226(c)	The ground wire may not be welded to the pipe/fitting being welded.			X	
42.	195.228/.234	Do procedures require welds to be nondestructively tested to ensure their acceptability according to API 1104 and as per 195.228(b) and per the requirements of 195.234 in regard to the number of welds to be tested?			X	
43.	195.234(b)	Nondestructive testing of welds must be performed: 1. In accordance with written procedures for NDT 2. By qualified personnel 3. By a process that will indicate any defects that may affect the integrity of the weld			X	
44.	195.589	Cathodic Protection			X	
45.	195.266	Construction Records			X	
46.	195.266(a)	Total Number of Girth Welds			X	
47.		Number of Welds Inspected by NDT			X	
48.		Number of Welds Rejected			X	
49.		Disposition of each Weld Rejected			X	
50.	195.266(b)	Amount, Location, Cover of each Size of Pipe Installed			X	
51.	195.266(c)	Location of each Crossing with another Pipeline			X	
52.	195.266(d)	Location of each buried Utility Crossing			X	
53.	195.266(e)	Location of Overhead Crossings			X	
54.	195.266(f)	Location of each Valve and Test Station			X	
PRESSURE TESTING			S	U	NA	NC
55.	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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56.	195.302(b)/ .302(c)	<p>Except for lines converted under §195.5, the following pipelines <i>may</i> be operated without having been pressure tested per Subpart E and without having established MOP under 195.406(a)(5) [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure].</p> <ul style="list-style-type: none"> - .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. - .302(b)(3): Any low-stress pipeline constructed before August 11, 1994, that does not transport HVL. - .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. <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>				
57.		Have all pipelines <u>other than those described above</u> been pressure tested per Subpart E?			X	
58.		If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under 195.406(a)(5) , in accordance with .302(c) ?			X	
59.	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	
60.	195.305(a)	<p>All pipe, all attached fittings, including components, must be pressure tested in accordance with 195.302.</p> <p>Note: 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	
61.	195.305(b)	Manufacturer Testing of Components			X	
62.	195.306	Appropriate Test Medium			X	
63.	195.308	Pipe associated with tie-ins pressure tested?			X	
64.	195.310(a)	Pipeline Test Records for useful life of facilities?			X	
65.	195.310(b)	Do test records required by paragraph (a) include:				
66.	195.310(b)(1)	Pressure recording charts			X	
67.	195.310(b)(2)	Test instrument calibration records			X	
68.	195.310(b)(3)	Name of operator, person responsible, test company used, if any			X	
69.	195.310(b)(4)	Date and time of test			X	
70.	195.310(b)(5)	Minimum test pressure			X	
71.	195.310(b)(6)	Test medium			X	
72.	195.310(b)(7)	Description of the facility tested and the apparatus			X	
73.	195.310(b)(8)	Explanation of any pressure discontinuities, including test failures that appear on the pressure recording charts.			X	
74.	195.310(b)(9)	Where elevation differences in the test section exceed 100 feet , a profile of the elevation over the entire length of the test section must be included			X	
75.	195.310(b)(10)	Temperature of the test medium or pipe during the test period			X	

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Comments:
 33-75-No new construction or pressure testing since last inspection

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: $P = (2 St/D) \times E \times F$. .106		X		

OPERATION & MAINTENANCE			S	U	NA	NC
76.	195.402(a)	Annual Review of O&M Manual (1 per yr/15 months)	X			
77.		Appropriate parts must be kept at locations where O&M activities are conducted	X			
78.	195.402(c)(4)	Determination of Areas requiring immediate response for Failures or Malfunctions			X	
79.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes			X	
80.	195.402(c)(10)	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 195.59			X	
81.	195.402(c)(12)	Establishment/Maintaining liaison with Fire, Police, and other Public Officials	X			
82.	195.402(c)(13)	Periodic review of personnel work – effectiveness of normal O&M procedures	X			
83.	195.402(c)(15)	Implementing the applicable control room management procedures required by 195.446 . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010).				X
84.	195.402(d)(1)	Response to Abnormal Pipeline Operations			X	
85.	195.402(d)(5)	Periodic review of personnel work – effectiveness of abnormal operation procedures			X	
86.	195.402(e)(1)	Notices which require immediate response			X	
87.	195.402(e)(2)	Prompt and effective response to each type of emergency Note: Review operator records of previous accidents and failures including third-party damage and leak response			X	
88.	195.402(e)(7)	Notifications to Fire, Police, and other Public Officials of an emergency			X	
89.	195.402(e)(9)	Post accident review of employees’ activities to determine if procedures were effective and corrective action was taken?			X	
90.	195.402(e)(10)	Actions to be taken by a controller during an emergency in accordance with 195.446 . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010).			X	
91.	195.403(b)(1)	Review with personnel their performance in meeting the objectives of the emergency response training program (1 per yr/15 months)	X			
92.	195.403(b)(2)	Make appropriate changes to the emergency response training program (1 per yr/15 months)	X			

Comments:

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Comments:
 Internal Design Pressure 195.402- Swissport did not obtain these records from former operator Olympic Pipeline when they took over operations in 2002. Swissport has information in their O&M manual referencing pipe material data and hydrotesting done in 2003 to support MOP of 275 psi (100% SMYS using 24000 for pipe yield strength is 1581psi which makes pipe low stress). This information was obtained from Olympic Pipeline but without supporting documentation. Additionally, the prv/rupture disc is set at 150 psi on the inlet to Tank 115 for pressure surges which is well below the MOP of 275psi.
 78. Entire facility is located within fenced area which has no public access.
 79. No failures or malfunctions
 80. No pipeline accidents
 81. Covered in Local Procedures for Covered Tasks
 82. Training records located in M&O Training Records
 83. Swissport does have a control room and this inspection does need to be scheduled in the future, it was not part of this inspection.
 84-90. No abnormal operations
 87. Note, when ESD is activated, block valve inside of fuel terminal remains static—cannot open or shut. So product continues to flow and Swissport needs to manipulate product internally within the tank farm.

OPERATION & MAINTENANCE (Cont)			S	U	NA	NC
93.	195.403(c)	Verification of supervisor knowledge of emergency response procedures (1 per yr/15 months)	X			
94.	195.404(a)(1)	Maps or Records of the following facilities: 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	X			
95.	195.404(a)(2)	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines.	X			
96.	195.404(a)(3)	The maximum operating pressure of each pipeline.	X			
97.	195.404(a)(4)	The diameter, grade, type, and nominal wall thickness of all pipe.		X		
98.	195.404(b)(1)	Pump Station Daily Discharge Pressure (maintain for at least 3yrs)			X	
99.	195.404(b)(2)	Any emergency or abnormal operations applicable under 195.402 (maintained for at least 3yrs)			X	
100.	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 .			X	
101.	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 .			X	
102.	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 .	X			
103.	195.406(a)/ .406(a)(1)	Except for surge pressures and other variations from normal operations, operator shall NOT 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			
104.	480-75-620	Change in MOP? Changed based on hydrotest?			X	
105.	195.408(b)(2)	Filing and disposition of notices of abnormal or emergency conditions.			X	
106.	195.412(a)	Operator must inspect the right-of-way at intervals not exceeding 3 weeks , but at least 26 times each calendar year			X	
107.	195.412(b)	Operator must inspect each crossing under a navigable waterway to determine the crossing condition at intervals not exceeding 5 years .			X	
108.	480-75-640	Depth of cover survey			X	
109.	195.420(b)	Mainline valves inspected to determine that it is functioning properly at intervals not exceeding 7½ months , but at least twice each calendar year.	X			
110.	480-75-500	Pipe movement study per API 1117			X	

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111.	195.428(a)	Insp. of overpressure safety devices (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL)	X			
112.	195.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE 5 yrs).			X	
113.	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.			X	
114.	195.428(d)	Inspection of Overfill Systems (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL)	X			
115.	480-75-300 (3)	Leak detection and alarm records	X			
116.	480-75-320	Surge analysis done?			X	
117.	195.430	Inspection of Fire Fighting Equipment	X			
118.	195.432(c)	Breakout Tanks: Inspect the physical integrity of in-service steel aboveground breakout tanks built to API Standard 2510 according to Section 6 of API 510. Amt. 195-86 Pub. 06/09/06 eff 07/10/06. Note: For Break-out tank unit inspection, refer to Breakout Tank Form	X			

		PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162)			
		S	U	NA	NC
119.	195.440 (e & f)	PUBLIC AWARENESS PROGRAM			
		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			
		API RP 1162 Baseline* Recommended Message Delivery Frequencies			
		Stakeholder Audience (Hazardous Liquid Operators)	Baseline Message Frequency (Starting from Effective Date of Plan)		
		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.			
120.	.440(g)	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		
121.	.440(i)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010.</u>	X		

Comments:

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Comments:

97. Need to add type of pipe to this section (XVIII) and obtain records from Olympic Pipeline.
 98. Swissport does have the ability to pump product (which does not meet specifications) back into Olympic’s pipeline using their transfer pumps. This makes the pumps, the line back to Olympic’s facility jurisdictional. This has not been used since the last inspection so there is no record of it.
 99-101. No abnormal operations or repairs since last inspection.
 104. No change in MOP since last inspection.
 105 No abnormal operating conditions since last inspection
 106. No right of way, entire facility is within secure fenced compound.
 107. No navigable water crossings
 108. No depth of cover survey required since last inspection
 109. Inspect monthly as part of Breakout tank inspection (valves at inlet and outlet).
 110. No pipe movement study since last inspection.
 112 No HVL tanks.
 113. No repairs or significantly alterations to Tank 115 since last inspection.
 116. No surge analysis done since last inspection.

DAMAGE PREVENTION PROGRAM			S	U	NA	NC
122.	195.442(c)(1)	List of Current Excavators			X	
123.	195.442(c)(2)	Notification of Public/Excavators			X	
124.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records)			X	
125.	195.442(c)(4)	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	
126.	195.442(c)(5)	Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.			X	
127.	195.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
128.		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline?			X	
129.		2. In the case of blasting, does the inspection include leakage surveys? (required)			X	
130.		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	

Comments:

121. Burns and McDonnell 3rd party review states program meets API 1162.
 122-130. 195.442(d)(2). Entire facility is within security controlled fenced perimeter due to airport activities therefore exempt from damage prevention program.

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131. Damage Prevention (Operator Internal Performance Measures)		S	U	NA	NC
132.	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)			X	
133.	Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?			X	
134.	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?			X	
135.	Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?			X	
136.	Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.			X	
137.	Are locates are being made within the timeframes required by state law and regulations? Examine record sample.			X	
138.	195.507(b) Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?			X	
139. Damage Prevention – Data Gathering Only					
140.	Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do	Y/N	N		
141.	Request data for last calendar year	Number of hazardous liquid-related one-call locate requests completed in the field		0	
142.		Number of third-party damages incurred		0	
143.		Cause of damage, where cause of damage is classified as one of the following:		N/A	
144.		1. Inaccurate locate		0	
145.		2. Failure to use reasonable care		0	
146.		3. Excavated prior to a locate being conducted; or		0	
147.		4. Excavator failed to call for a locate		0	

Comments:
 132-138. 195.442(d)(2). Entire facility is within security controlled fenced perimeter due to airport activities therefore exempt from damage prevention program.
 140-147 No projects since last inspection and facility is exempt per 195.442(d)(2).

CPM Systems		S	U	NA	NC
148.	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			X	
149.	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	
150.		CPM Specific Information:		X	

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151.	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	
152.		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:
148-152. Swissport does not use a CPM system for leak monitoring.

CORROSION CONTROL			S	U	NA	NC
153.	195.555	Supervisors maintain thorough knowledge of corrosion procedures.	X			
154.	195.567	Test Lead Maintenance, frequent enough intervals	X			
155.	480-75-510	Corrosion remediation within 90 days			X	
156.	195.569	Inspection of Exposed Buried Pipelines (External Corrosion)			X	
157.	195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (1 per yr/15 months)	X			
158.	195.573(a)(2)	Close Interval surveys (meeting the circumstances determined by the operator)			X	
159.	195.573(b)	External Corrosion Control, Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/NTE 39 months)			X	
160.	195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers	X			
161.	195.573(d)	External Corrosion Control - Bottom of Breakout Tanks	X			
162.	195.573(e)	Corrective actions as required by .401(b) and, if IMP pipeline, 195.452(h).			X	
163.	195.575	Electrical isolation inspection, testing and monitoring (if applicable)	X			
164.	195.577	Testing for Interference Currents			X	
165.	195.579(a)	Corrosive effect investigation			X	
166.	195.579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (2 per yr/NTE 7½ months)			X	
167.	195.579(c)	Inspection of Removed Pipe for Internal Corrosion			X	
168.	195.583(a)	Atmos. Corr. Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore)	X			
169.	195.585(a)	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG			X	
170.	195.585(b)	Localized Corrosion Pitting – replace, repair, reduce MOP			X	
171.	195.589(a)&(b)	Cathodic Protection (Maps showing anode location, test stations, CP systems, protected pipelines, etc.)	X			

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Comments:
155-156. No corrosion remediation or buried pipe inspection since last inspection 158. No survey since last inspection, Swisport will ask their NACE inspector (Norton) whether a close interval survey is necessary. 159. No unprotected pipe 162. No corrective actions 164 No interference currents 165-167. No corrosive materials 169-170 No corrosion

FIELD REVIEW			S	U	N/A	N/C
172.	195.262	Pumping Stations – Adequate Ventilation			X	
173.	195.262	Station Safety Devices			X	
174.	195.308	Pre-pressure Testing Pipe - Marking and Inventory			X	
175.	195402(c)(13)	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site.	X			
176.	195.403	Supervisor Knowledge of Emergency Response Procedures	X			
177.	195.410	Right-of-Way Markers			X	
178.	480-75-540	Markers at exposed areas			X	
179.	195.412	ROW/Crossing Under Navigable Waters			X	
180.	195.420	Valve Maintenance	X			
181.	195.420	Valve Protection from Unauthorized Operation and Vandalism	X			
182.	195.426	Scraper and Sphere Facilities and Launchers			X	
183.	195.428	Pressure Limiting Devices	X			
184.	195.428	Relief Valves - Location - Pressure Settings - Maintenance	X			
185.	480-75-320	Relief Device set at or below MOP	X			
186.	195.428	Pressure Controllers			X	

Comments:
172-173 No pump stations 174. No pretested pipe 177. No right of way to mark 178. No exposed pipe 179. No water crossings 182. No scraper or sphere facilities (Olympic owns them). 186 No pressure controllers.

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FIELD REVIEW (Cont)			S	U	N/A	N/C
187.	480-75-300	Leak Detection – 8% in 15 Minutes			X	
188.	480-75-300	Leak detection at flow and no flow conditions			X	
189.	195.430	Fire Fighting Equipment	X			
190.	195.432	Breakout Tanks	X			
191.	480-75-330	Do Breakout Tanks have independent overfill alarms?	X			
192.	195.434	Signs - Pumping Stations - Breakout Tanks	X			
193.	195.436	Security - Pumping Stations - Breakout Tanks	X			
194.	195.438	No Smoking Signs	X			
195.	195.446	Control Room(s)	X			
196.	195.501-195.509	Important: 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 http://primis.phmsa.dot.gov/oqdb/home Form Completed? Y/N Y				
197.	195.571	Cathodic Protection (test station readings, other locations to ensure adequate CP levels)	X			
198.	195.573	Rectifiers, Reverse Current Switches, Diodes, Interference Bonds		X		
199.	195.575	Electrical Isolation; shorted casings			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.)	X			

Comments: 187-188. Leak detection requirement not intended for inter plant piping 198. Swissport had low CP read (-0.692on Cell 1 which is the tank bottom.

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Oil Pollution Act (49 CFR 194)

Field Verification of Facility Response Plan Information			Y	N	N/A
201.		Is there a copy of the approved Facility Response Plan present? [See Guidance OPA-1]			X
202.	194.111	RSPA Tracking Number: N/A Approval Date:			
203.	194.107	Are the names and phone numbers on the notification list in the FRP current?[OPA-2]	X		
204.	194.107	Is there written proof of a contract with the primary oil spill removal organization (OSRO)? [OPA-3]	X		
205.	194.107	Are there complete records of the operator's oil spill exercise program? [OPA-4]	X		
206.	194.117	Does the operator maintain records for spill response training (including HAZWOPER training)? [OPA-5]	X		

Comments (If any of the above is marked N or N/A, please indicate why, either in this box or in a referenced note):

Swissport has an exemption from WA DOE (letter dated 10/9/2007) for coverage under Chapter 90.56 RCW, WAC 173-180 and 173-182. This letter states because they have a Port of Seattle approved spill control system, they are no longer required to maintain an approved oil spill contingency plan, operations manual, prevention plan or training and certification plan.

OPA-1 - RSPA Tracking Number: This is also known as the “sequence number.” It is a four-digit number that PHMSA HQ assigns to each facility response plan (FRP). If the operator does not know their sequence number, they should look on their copy of the FRP for the sequence number. Also, PHMSA HQ always puts the sequence number in every plan-related letter to operators. If the operator is a new operator without a plan, the unit has a new owner, or the unit has new facilities not incorporated into the existing OPA-90 Plan, the answer is NO. Direct the operator to contact L.E. Herrick, 202-366-5523.

Copy of approved FRP: Every oil pipeline operator must have an FRP approved by PHMSA. The operator should be able to produce their PHMSA plan approval letter. When PHMSA HQ approves a plan, the approval is valid for five years from the date of the approval letter.

OPA-2 - Names and phone numbers: Operators are required to keep the notification lists in their FRP current. The inspector should examine the notification list in the FRP and spot-check the accuracy of the names and phone numbers when they interview the operator. It is critical to check the Qualified Individual (QI) and Alternate QI data.

OPA-3 - Proof of OSRO contract: Operators whose FRP’s state that they are relying on clean-up contractors for spill response are required to have contracts with the oil spill removal organizations (OSRO’s) that they cite in the FRP. The inspector should ask to see documentation that the operator has a contract in place with the primary OSRO listed in the FRP.

OPA-4 - Exercise documentation: Operators are required to conduct a variety of spill response exercises under Part 194, and make their exercise records available to PHMSA for inspection. Inspectors should check to see if the operator lists the date, time, location and names of exercise participants. If the inspector has doubts about whether the operator’s exercise documentation is accurate, it should be noted on the inspection form so that PHMSA HQ can follow up with the operator. The documentation should include annual spill management team tabletop exercises, quarterly internal notification drills, and annual response equipment deployment drills? The drill does not necessarily need to include a pipeline spill scenario, but should test the operator’s personnel, equipment, resources, and response strategies needed for responding to a comparable pipeline spill.

OPA-5 - Training records: Operators are required to train their personnel to carry out their individual roles under the FRP. The inspector should spot-check the files of key personnel listed in the FRP to ensure that they have been trained to carry out their duties in a response. Special attention should be given to documenting the safety training required under OSHA’s Hazwoper standard (29 CFR 1910.120). Each person involved in a spill response is required under 194.117 to have training commensurate with their duties.

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Recent PHMSA Advisory Bulletins (Last 2 years)

Leave this list with the operator.

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-01	Jan 26, 2010	Pipeline Safety: Leak Detection on Hazardous Liquid Pipelines
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe
ADB-10-04	April 29, 2010	Pipeline Safety: Implementation of Electronic Filing for Recently Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-05	June 28, 2010	Pipeline Safety: Updating Facility Response Plans in Light of Deepwater Horizon Oil Spill
ADB-10-06	August 3, 2010	Pipeline Safety: Personal Electronic Device Related Distractions
ADB-10-08	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation

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