

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			
Inspection ID/ Docket Number	6188		
Inspector Name & Submit Date	Dennis Ritter, May 18, 2015 Derek Norwood		
Chief Engineer Name & Review Date	Joe Subsits, May 28, 2015		
Operator Information			
Name of Operator:	Tidewater Terminal Company	OPID #:	31051
Name of Unit(s):	Tidewater Terminal Company-Pasco		
Records Location:	Pasco		
Date(s) of Last Review:	July 8-11, 2013	Inspection Date(s)	May 4-6, 2015

Inspection Summary:

An inspection of Tidewater Terminal Company's Snake River Terminal was conducted from May 4, 2015 to May 6, 2015 with the exit interview conducted on the afternoon of May 6, 2015. Findings from this inspection are summarized below. This inspection included a review of operation and maintenance records, construction records, OQ records and field verification and the following pipeline facilities.

Breakout tanks: Tank 1,2, 27, 32, 33
 Rectifiers 1 and 2 for Tank farm 1 and 2 respectively
 Blockvalve 1 on SRT to BNSF 4" line
 Multiple CP test sites (see Field notes)
 Isolation test points
 Rights-of-way
 Markers
 Signage
 Security

1) **49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07**-- 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?

Breakout tanks are not depicted on NPMS as required. Note: Tidewater stated they didn't know they needed to do this as the PIMMA program does not specifically ask for this information. NOPV

2) **§195.428 Overpressure safety devices and overfill protection systems** (a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

(d) After October 2, 2000, the requirements of paragraphs (a) and (b) of this section for inspection and testing of pressure control equipment apply to the **inspection and testing of overfill protection systems**.

Although the operator did provide records of testing the overfill protection devices, the person performing the test, Jim Hines, was not qualified to do so. This would make the test validation questionable for those conducted by Mr. Hines. NOPV

3) **§195.507 Recordkeeping**

Each operator shall maintain records that demonstrate compliance with this subpart

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Inspection Summary:

(a) *Qualification records shall include:*

- (1) *Identification of qualified individual(s);*
- (2) *Identification of the covered tasks the individual is qualified to perform;*
- (3) *Date(s) of current qualification; and*
- (4) *Qualification method(s).*

(b) *Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task.*

Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

The following were noted:

- John Hines performed task-030 “Test overflow protective devices (liquid)” multiple times in 2013 and 2014 (10/10/13), however, Tidewater’s records, energyworld.net, shows no record of being qualified to perform this task.
- Karen Scott performed Task XXX Monthly Breakout Tank visual inspection, multiple times in 2013/2014, however, Tidewater’s records, energyworld.net, shows no record of being qualified to perform this task.
- Tim Berry performed task XXX- inspect and operate gate valve during field inspection, however, Tidewater’s records, energyworld.net, shows no record of being qualified to perform this task.

NOPV

4) **§195.571 What criteria must I use to determine the adequacy of cathodic protection?** *Cathodic protection required by this Subpart must comply with one or more of the applicable criteria and other considerations for cathodic protection contained in paragraphs 6.2 and 6.3 of NACE SP 0169 (incorporated by reference, see § 195.3). The following is taken from Tidewater’s O&M Manual:*

401.2 Criteria for Achieving Cathodic Protection

(a) *Any of the below listed criteria, when complied with separately or collectively will indicate adequate cathodic protection has been achieved for steel pipe or external carbon steel storage tank bottoms.*

- *A negative (cathodic) potential of at least 850 mV with the current applied. This potential shall be measured with respect to a saturated copper/copper sulfate reference electrode (CSE) contacting the electrolyte. Consideration must be given to voltage drops other than those across the structure-to-electrolyte boundary for valid interpretation of this voltage measurement.*

The following were noted:

- During the field portion of the inspection, P/S readings were taken on the chime at 4 quadrants of selected breakout tanks. Tank 32 on the north side had a reading of -472 mV with current applied. This is well below the acceptance criteria. The other three quadrants were well above the acceptable range. Tidewater has the annual CP survey scheduled for July, 2015 and they will have their CP specialist look into this issue.
- During the field portion of the inspection, P/S readings were taken at various formal test stations as well as at locations where the pipelines were above ground (block valves). At one location, adjacent to Tesoro’s tank farm, the P/S reads were -612, -613 and -612 mV for the three SRT to Tesoro 6-inch pipelines. This is well below the acceptance criteria. Tidewater was aware of this situation and was actively pursuing the problem.

AOC-Tidewater has 90 days to investigate the low reads and mitigate as necessary.

5) **§195.307 Pressure testing aboveground breakout tanks.**

(c) *For aboveground breakout tanks built to API Standard 650 (incorporated by reference, see § 195.3 and first placed in service after October 2, 2000, testing must be in accordance with Section 5.2 of API Standard 650 (incorporated by reference, see § 195.3).*

(d) *For aboveground atmospheric pressure breakout tanks constructed of carbon and low alloy steel, welded or riveted, and non-refrigerated and tanks built to API Standard 650 or its predecessor Standard 12C that are returned to service after October 2, 2000, the necessity for the hydrostatic testing of repair, alteration, and reconstruction is covered in section 10.3 of API Standard 653.*

Tanks 1, 2, 14, 22, 24, 33—Could not find hydrotest record for tanks 1 and 2 put into service in 1975 and 1976 respectively. Could not find hydrotest record for tank 14, first put into service in 1945. Could not find hydrotest record for tank 24 put into service in 1952.

AOC-all of these tanks are pre October 2, 2000, so code language would not apply, however, Tidewater should make sure records are completed in the future if any pre-code tanks are re-hydrotested.

6) **§195.432 Inspection of in-service breakout tanks.**

(a) *Except for breakout tanks inspected under paragraphs (b) and (c) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, inspect each in-service breakout tank.*

(b) *Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks*

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according to API Standard 653 (incorporated by reference, see § 195.3). However, if structural conditions prevent access to the tank bottom, the bottom integrity may be assessed according to a plan included in the operations and maintenance manual under § 195.402(c)(3).
(d) The intervals of inspection specified by documents referenced in paragraphs (b) and (c) of this section begin on May 3, 1999, or on the operator's last recorded date of the inspection, whichever is earlier.

- Records review noted that Tank 4 was due for a 5 year API 653 (Section 6.3.2) external inspection on 12/29/14, however, it was performed 3/20/15-late by 2 months, 20 days. NOPV
- Records review also noted that the API 653 routine in-service inspection (Section 6.3.1) completed by Tidewater personnel, did not occur for Tanks 31,32,33,34 for April 2014. Note Tidewater procedures state this inspection interval shall not exceed one month (O&M 205.9) which is more stringent than the federal code. Karen Scott's OQ records do not show a qualification to perform Task 027.1 Routine Monthly Inspection of Breakout Tanks (liquid). NOPV

HQ Address: PO Box 1210 6305 NW Old Lower River Rd Vancouver, WA 98660		System/Unit Address: 671 Tank Farm Road Pasco, WA 99301	
Co. Official:	Bill Collins	Phone No.:	
Phone No.:	360-759-0306	Fax No.:	
Fax No.:		Emergency Phone No.:	509-747-7701
Emergency Phone No.:	509-547-7701		
Persons Interviewed		Title	Phone No.
John Sherman		General Manager, Terminals	509-544-2201
Ron McClary		Terminal Maintenance Manager	509-727-1144
Mark Davis		Terminal Operations Manager	509-396-1179
Josh Jarmon		Quality & Compliance Manager	509-547-7701

UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. 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.) Complete O&M review by D. Ritter	Date:	12/14/11

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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 No conversions 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 No 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).			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:

LOW-STRESS PIPELINES IN RURAL AREA No low stress rural pipelines		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.	195.12(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:

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REPORTING						
17.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 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? Breakout tanks are not depicted on NPMS. Tidewater did not know they needed to do this as the PIMMA program does not specifically ask for this information.	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? Breakout tanks are not depicted on NPMS. Tidewater did not know they needed to do this as the PIMMA program does not specifically ask for this information.		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. 2015-filed 4.24.15	X			
20.	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).	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 http://portal.phmsa.dot.gov/pipeline (Amdt. 195-95, 75 FR 72878, November 26, 2010). No Accidents			X	
22.	195.54 (b)	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) No Accidents			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)) No SRC reports			X	
24.	195.56(b)	SRC Report requirements, including corrective actions (taken and planned) No SRC reports			X	
25.	195.57	Do records indicate reports were submitted within 60 days of completing inspection of underwater pipelines? 195.413(a) (195.57) No underwater pipelines			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? No abandoned offshore pipelines			X	
27.	195.64	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline (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 No new construction since last inspection			X	
29.	480-75-620	Was MOP changed based on hydrotest? Report submitted? Yes, but decreased pressure 1429 to 835, 2014 test			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; no reportable accidents 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.			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: No written reports-no reportable accidents 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.			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. No emergency telephonic notifications			X	
33.	480-75-630(4)	Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013) (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)	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? No reported damages			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? No reported damages Note: Records maintained for two years and made available to the commission upon request.			X	
37.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? There have been no third party damages				
38.	480-75-630(5)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 	X			
39.	480-75-630(5)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 			X	
40.	480-75-630(5)(c)	<ul style="list-style-type: none"> 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. 			X	
41.	480-75-630(6)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> 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) A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b) 			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) Tim Berry, Records API 1104 Test for Examination of Welds. OK. Projects: 6" spool M600 pump, Tank 24 tie-in, Tank 2 New piping, Tank 27 new piping,	X			

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43.	195.214(b)	Detailed Test Results to Qualify Welding Procedures and Qualifying tests TW-01, TW-02, TW-03, TW-04 OK	X			
44.	195.222(a)	Welders must be qualified in accordance with Section 6 of API Standard 1104 (20th 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) , 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). Tommy Sizemore,	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. No arc burn repairs			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? (Ammonium Persulfate).	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 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? Section 521 of O&M	X			
50.	195.234(b)	Nondestructive testing of welds performed: Northwest Inspection: Brian Martin, Jacob Torres, Jeremy Kimball OK (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			
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? No used pipe.			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? hydrotested in place	X			
55.	195.266	Construction Records maintained for life of pipeline Reviewed Tidewater Pasco Rail Alignment Sheets				
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			
PRESSURE TESTING			S	U	NA	NC
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). Pressure test for line to BNSF rail yard in Pasco, 4.2 miles 4/23/14	X			

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62.	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>				
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 195.406(a)(5) , in accordance with .302(c)? None			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. BNSF line: Hydro test 4/23/14--1050 for 4 hrs, 920 for 4 hrs MOP is 835	X			
66.	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			
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. None			X	
80.	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 20 of elevation differential			X	
81.	195.310(b)(10)	Temperature of the test medium or pipe during the test period	X			

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

OPERATION & MAINTENANCE			S	U	NA	NC
82.	195.402(a)	Annual Review of O&M Manual (1 per yr/15 months) March 16, 2015, March 10, 2014, May 2, 2013	X			
83.		Appropriate parts must be kept at locations where O&M activities are conducted	X			
84.	195.402(c)(4)	Determination of Areas requiring immediate response for Failures or Malfunctions	X			
85.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes O&M 811.1	X			
86.	195.402(c)(10)	Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards. No abandoned facilities Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per 195.59			X	
87.	195.402(c)(12)	Establishment/Maintaining liaison with Fire, Police, and other Public Officials ELPC-emergency local planning commission meetings, mock drills, facility walk through.	X			
88.	195.402(c)(13)	Periodic review of personnel work – effectiveness of normal O&M procedures and corrective action when deficiencies are found	X			
89.	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). No control room			X	
90.	195.402(e)(1)	Records that indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures. No events requiring immediate response			X	
91.	195.402(e)(2)	Prompt and effective response to each type of emergency . No events requiring immediate response Note: Review operator records of previous accidents and failures including third-party damage and leak response			X	
92.	195.402(e)(7)	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)? Other than drills, not notifications since last inspection			X	
93.	195.402(e)(9)	Post accident review of employees’ activities to determine if procedures were effective and corrective action was taken? No accidents since last inspection			X	
94.	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). No control room or emergency			X	
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)	X			

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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) Mark Davis, Ron McClary, John Shaw testing done 4/06/15	X			
99.	195.404(a)(1)	Maps and Records of the following facilities maintained and made available: Breakout tanks i. Pump stations ii. Scraper and sphere facilities iii. Pipeline valves iv. Facilities to which 195.402(c)(9) applies v. Rights-of-way vi. Safety devices to which 195.428 applies	X			
100.	195.404(a)(2)	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines.	X			
101.	195.404(a)(3)	The maximum operating pressure of each pipeline in accordance with 195.406 Surge analysis shows no need for surge relief on BNSF line as max pressure scenario is 802 psi and MOP is 835.	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	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. Have not had any abnormal operations which required corrective actions. Do have annual drills and activities which go over abnormal operations.			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. Looked at repair records for leak/pipe replacement from 2000.	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.	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. Produced all records requested.	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			
109.	480-75-620	Change in MOP? Changed based on hydrotest? New hydro test for BNSF line 4/23/14	X			
110.	195.408(b)	Records indicating emergency communication system(s) use was as required Cell phones, radio and system fails safe if loss of power	X			
111.	195.412(a)	Operator must inspect the right-of-way at intervals not exceeding 3 weeks , but at least 26 times each calendar year 1/week per WAC 480-75-530 OQ-John Hines, Billy Thomas	X			
112.	195.412(b)	Records indicating ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed No navigable crossings			X	
113.	480-75-640	Depth of cover surveys and mitigation BNSF 2013 OK, SRT inbound/outbound 2011	X			

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114.	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. SRT to BNSF-2012 to 2015 OK; M112, M33-4, V51, M13-4, M12,M-10, M11-4 2012 to 2015 OK	X			
115.	480-75-500	Pipe movement study per API 1117 No moving or lowering			X	
116.	195.428(a)	Insp. of overpressure safety devices (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL)	X			
117.	195.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE 5 yrs). No HVL tanks			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. No 2510 tanks 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. API 2350 applies to tanks 23,25,29 as they've been significantly altered (new bottom) OK	X			
119.	195.428(d)	Inspection of Overfill Systems (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL) John Hines did inspection 10/10/13 but energyworld net shows he is not qualified for this task-030 Test overfill protective devices (liquid). Tidewater does not believe this is a qualified task per 195.501. I believe it is a covered task and meets the 4 part test. See No. 138 below as will be an OQ violation.		X		
120.	480-75-300 (3)	Leak detection and alarm records	X			
121.	480-75-320	Surge analysis done? 2000 for SRT inbound/outbound; 2013 Nustar EFRD analysis for SRT to BNSF line.	X			
122.	195.430	Inspection of Fire Fighting Equipment inspected random fire extinguishers all OK	X			
123.	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 No API 2510 tanks			X	

PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162)			S	U	NA	NC	
124.	195.440 (e & f)	PUBLIC AWARENESS PROGRAM	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					
		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.							
125.	.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				
126.	.440(i)	Records indicating that the continuing public education program evaluation process has been implemented and do records indicate that continuous improvement is being implemented	X				

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Comments:

DAMAGE PREVENTION PROGRAM			S	U	NA	NC
127.	195.442(a)	Records indicating the damage prevention program is being carried out as written	X			
128.	195.442(c)(1)	List of Current Excavators	X			
129.	195.442(c)(2)	Notification of Public/Excavators	X			
130.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records)	X			
131.	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			
132.	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			
133.	195.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
134.		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline?	X			
135.		2. In the case of blasting, does the inspection include leakage surveys? (required)	X			
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? Have not had any but procedures call out to do this.			X	
137.	OPERATOR QUALIFICATION					
138.	195.507(a) .507(b)	Are personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? John Hines did inspection 10/10/13 but energyworld net shows he is not qualified for this task-030 Test overflow protective devices (liquid), Karen Scott was shown performing Task XXX Monthly Breakout Tank visual inspection and she was not qualified for this task in energyworld.net records.		X		
139.	195.507(a) .507(b)	Are qualification records available for contractor personnel that contain the required elements?	X			

Comments:

CPM SYSTEMS No CPM System			S	U	NA	NC
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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.		CPM Specific Information:				
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:

CORROSION CONTROL			S	U	NA	NC
145.	195.589(c) 195.555	Supervisors maintain thorough knowledge of corrosion procedures. Supervisor knowledge of Corrosion Control Test--John Sherman, Ron McClary, Mark Davis OK	X			
146.	195.589(c) 195.567(c)	Test lead maintenance / Frequent enough intervals	X			
147.	480-75-510	Corrosion remediation within 90 days Rectifier at Tesoro-blistered coating on Tidewater 4" BNSF Line. Shut off rectifier immediately. Dug up line approximately 3 months later and repaired coating.	X			
148.	195.589(c) 195.569	Inspection of Exposed Buried Pipelines (External Corrosion) "Inspection, Repair, Replacement and Crossing Report"	X			
149.	195.589(c) 195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (1 per yr/15 months) Reviewed 2013 and 2014 annuals	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? None since last inspection			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) No unprotected pipe			X	
152.	195.589(c) 195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers	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) Tidewater has a short (low CP) on the SRT/Tesoro inbound/outbound lines at Tesoro. They are in process of isolating the short.	X			
155.	195.589(c) 195.577(a)	Testing for Interference Currents	X			
156.	195.589(c) 195.579(a)	Corrosive effects investigation No internal corrosion			X	

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157.	195.589(c) 195.579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (2 per yr/NTE7½ months) No coupons			X	
158.	195.589(c) 195.579(b)(1-3)	Corrosion inhibitors used in sufficient quantities No corrosion inhibitors			X	
159.	195.589(c) 195.579(a)(c)	Inspection of Removed Pipe for Internal Corrosion last removal was 2011	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) Last done in 2013 OK	X			
161.	195.589(c) 195.585(a)	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG No general corrosion			X	
162.	195.585(b)	Localized Corrosion Pitting – replace, repair, reduce MOP-- none since last inspection			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.) No new CP since installation since 2000.			X	

Comments:

FIELD REVIEW			S	U	N/A	N/C
164.	195.262(a)	Has adequate ventilation been provided at pump station buildings? No pump station building			X	
165.	195.262(a)	Have warning devices that warn of the presence of hazardous vapors been installed at new pump station buildings? No pump station building			X	
166.	195.262(b)	Has a device for activating emergency shutdown of the pump station been installed?	X			
167.	195.262(b)	If power is needed to actuate safety devices, has an auxiliary power supply been provided?	X			
168.	195.262(b)	Have safety devices been installed to prevent over-pressuring new or modified pumping equipment?	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?	X			
170.	195.262(e)	Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps? Diesel driven	X			
171.	195.302	Is pressure testing being adequately conducted? (.304, .305, .306, .307) No pressure testing during inspection			X	
172.	195.308	Pre-pressure Testing Pipe - Marking and Inventory	X			
173.	195.402(c)(13)	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site. No excavation during inspection			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)	X			
176.	480-75-540	Markers at exposed areas No exposed areas not under Tidewater control-ie block valves.			X	
177.	195.412	Are the ROW conditions acceptable for the type of patrolling used?	X			
178.	195.420 (a), (b)	Valve Maintenance & Operation Operated block valve 1 at Tidewater for BNSF line.	X			

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FIELD REVIEW			S	U	N/A	N/C
179.	195.420(c)	Valve Protection from Unauthorized Operation and Vandalism	X			
180.	195.426	Are launchers and receivers equipped with relief devices?	X			
181.	195.428(a)	Are inspections of overpressure safety devices adequate (including HVL lines)? Explained process of testing pressure reliefs-did not test as lines were running during inspection.	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? No HVL tanks			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.]	X			
184.	480-75-320	Relief Device set at or below MOP Did not check as all pipelines were running during field inspection				X

Comments:

FIELD REVIEW (Cont)			S	U	N/A	N/C
185.	480-75-300	Leak Detection – 8% in 15 Minutes Did not test leak detection-Tidewater has documented testing confirming sensitivity				X
186.	480-75-300	Leak detection at flow and no flow conditions Did not test leak detection-Tidewater has documented testing confirming sensitivity.				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 Inspected Tanks 1,2,27,32,33-single bottom, not inspected last inspection (2013)	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)) SCADA displays are located within tank farm, at MCCs for pumps, and at terminal dock shop.	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)) Tidewater does not have controllers or control room			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/Uploaded? Y/N				
197.	195.571	Cathodic Protection (test station readings, other locations to ensure adequate CP levels) . During field inspection, CP on chime of the north side of Tank 32 was -472mV. The annual CP survey is to occur in July and this low read will be investigated by their CP specialist to determine if it is an issue.		X		

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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, disbanded coatings, pipe supports, deck penetrations, etc.) 195.583(c) (195.581(a))	X			

Comments:

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
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>