

PHMSA Form 19 Question Set (IA Equivalent)
HAZARDOUS LIQUID INTEGRITY MANAGEMENT IMPLEMENTATION INSPECTION

Name of Operator:	Tidewater Terminal Company	Insp. # 6188
OPID No. 31051	Unit ID No. SRT	
HQ Address:	System/Unit Name & Address:	
PO Box 1210 6305 NW Old Lower River Rd Vancouver, WA 98660	671 Tank Farm Road Pasco, WA 99301	
Operator Official:	Bill Collins	Address: 6305 NW Old Lower River Rd
Title:	EHS&S Manager	City: Vancouver
Phone:	360-759-0306	State: WA
Emergency Phone/Cell:	509-547-7701	Zip Code: 98660
Persons Interviewed	Title	Phone No.
Josh Jarmin	EHS&S Specialist	509-547-7701
Ron McClary	Terminal Maintenance Manager	509-727-1144
John Sherman	General Manager, Terminals	509-544-2201
State Representative(s): Dennis Ritter, Derek Norwood		Inspection Date(s) May 5-6, 2015
Records Location:		Snake River Terminal, Pasco WA

Unit Description:
Snake River Terminal (SRT)/Tidewater Terminal Company-Pasco Tidewater jurisdictional facilities include three 6-inch diameter pipelines (approx. 4,903 feet, each) and 19 breakout tanks with a total capacity of 10.1 million gallons. On September 28, 2012, Tidewater took ownership of the Nustar Energy hazardous liquid pipeline which runs from the SRT to Burlington Northern Sante Fe rail yard. This line transports dyed 2D15 diesel to BNSF's fueling facility in Pasco. This line is a steel, 4" FBE coated pipe with a 0.237" wall thickness. The operator stated the MOP of 285 psig is based on a 150# ANSI flange. Due to losing records, this line was re-hydrotested on April 23, 2014 to 1050 psi for 4 hrs, with an additional 4 hrs at 925 psi per 49CFR 195.304.
Portion of Unit Inspected:
NOTE: WUTC inspector Al Jones performed a full IMP inspection on June 16-19, 2014 as follows: The inspection included 127 questions from the Pipeline and Hazardous Materials Safety Administration (PHMSA) Inspection Assistance (IA) modules for Assessment and Repair, Integrity Management, and Reporting. As the questions below are repeated from the recent inspection, this inspection will focus on issues from that 2014 inspection which need to be verified as completed.
<ul style="list-style-type: none"> • Inspected tank farm: Tanks, 1, 2, 27, 32 and 33: P/S reads on Tanks 1,2, 27, 32 and 33 (all four quadrants), and rectifier inspection for tank farm. • Inspected SRT to Tesoro inbound/outbound lines. This included pumps, block valves, entire R/W, markers, CP test points, rectifier, SCADA • Inspected SRT to BNSR rail yard line. This included pumps, block valves, entire R/W, markers, CP test points, rectifier, SCADA

Sat+ - Exceeds requirements/exemplary performance
Sat - Meets requirements
Con - "Concern" meets requirements, but is an area of recommendation and/or area that if not addressed may lead to non-compliance
Unsat - Does not meet requirements
N/A - Not Applicable
N/C - Not Checked

Assessment and Repair - Repair Criteria (HCA)

2. Timely Discovery *From the review of the results of selected ILI and remediation projects, did discovery of all anomalies occur promptly, but no later than 180 days of completion of the assessment?* (AR.RCHCA.DISCOVERY.R) (detail) 195.452(h)(2)

Notes

N/C-Reviewed during July 2014 IMP inspection-ILI run occurred in April 2015. Results not yet available

7. Pressure Reduction *From the review of the results of ILI and remediation projects, was an acceptable pressure reduction promptly taken for each Immediate Repair condition or when a repair schedule could not be met?* (AR.RCHCA.PRESSREDUCE.R) (detail) 195.452(l)(1)(ii) (95.404(a); 195.404 (b); 195.452(h)(1)(ii); 195.452(h)(4)(i); 195.55(a))

Notes

N/A-no pressure reduction

8. Categorization of Defects *From the review of the results of integrity assessments and remediation projects, were there any defects that were not properly categorized?* (AR.RCHCA.DEFECTCAT.R) (detail) 195.452(l)(1)(ii) (195.452(h)(4))

Notes

N/C-Reviewed during July 2014 IMP inspection- ILI run occurred in April 2015. Results not yet available

10. IM Schedule *Do records demonstrate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(3)?* (AR.RCHCA.IMSCHEDULE.R) (detail) 195.452(l)(1)(ii) (195.452.(h)(3))

Notes

N/C-Reviewed during 2014 IMP inspection- ILI run occurred in April 2015. Results not yet available

11. Timely Remediation *From the review of the results of selected ILI and remediation projects, were defects in segments that could affect an HCA remediated or dispositioned within the applicable mandatory time limits of 195.452(h)(4)?* (AR.RCHCA.SCHEDULEIMPL.R) (detail) 195.452(l)(1)(ii) (195.452(h)(4))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

Assessment and Repair - Repair Criteria (O and M)

3. Remedial Actions (OM) *Do the performance and documentation of remediation meet procedural requirements for repairs in both HCA and non-HCA?* (AR.RCOM.REMEDIATIONOM.O) (detail) 195.422(a) (195.422(b); 195.402(a); 195.402(c)(14); 195.569; 195.579(c))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

Assessment and Repair - External Corrosion Direct Assessment (ECDA)

4. ECDA Indirect Examination *Was the indirect examination performed in accordance with the operator's procedures and 195.588(b)(3)?* (AR.EC.ECDAINDIRECT.O) (detail) 195.588(c) (195.452(j)(5)(iii))

Notes

N/A-No ECDA Examination

6. ECDA Direct Examination *Was the direct examination performed in accordance with requirements?* (AR.EC.ECDADIRECT.O) (detail) 195.588(b)(4) (195.452(j)(5)(iii))

Notes

N/A-No ECDA Examination

7. Post Assessment *Do records indicate that requirements were met for post assessment?* (AR.EC.ECDAPOSTASSESS.R) (detail) 195.589(c) (195.588(b)(5); 195.452(j)(3); 195.452(j)(4))

Notes

N/A-No ECDA Examination

Assessment and Repair - In-Line Inspection (Smart Pigs)

9. IMP Baseline and/or Continual Assessments Prioritized Assessment Schedule *Does a review of records indicate that continual assessments are implemented as specified in the plan?* (AR.IL.ASSESSSCHEDULE.R) (detail) 195.452(l)(1)(ii) (195.452(b)(5); 195.452(c); 195.452(d); 195.452(f)(2); 195.452(f)(5))

Notes

N/C-Reviewed during July 2014 IMP inspection-ILI run occurred in April 2015 (5 year max)

13. Integration of ILI Results with Other Information *Did the operator integrate other data/information when evaluating tool data/results in the records reviewed?* (AR.IL.ILIINTEGRATION.R) (detail) 195.452(l)(1)(ii) (195.452(g))

Notes

N/C-Reviewed during July 2014 IMP inspection- ILI run occurred April 2015. CIS is scheduled for June 2015.

20. Compliance with ILI Procedures *Have the ILI procedures been followed?* (AR.IL.ILIIMPLEMENT.O) (detail) 195.452(b)(5)

Notes

N/C-Reviewed during July 2014 IMP inspection-ILI run occurred April 2015. Data not yet available. Verified IMP has been updated in response to 2014 IMP inspection findings and ILI procedures followed.

Assessment and Repair - Other Technology

2. Other Technology Process *From the review of the results of selected integrity assessments, do records show that the assessment was performed in accordance with procedures and vendor recommendations?* (AR.OT.OTPLAN.R) (detail) 195.452(l)(1)(ii) (195.452(j)(5)(iv); 195.452(f)(5))

Notes

N/A-no other technology used

3. Other Technology Process *Has the process for the use of "Other Technology" been followed?* (AR.OT.OTPLAN.O) (detail) 195.452(j)(5)(iv)

Notes

N/A-no other technology used

4. Categorization of Defects *From the review of the results of selected integrity assessments, were defects identified and categorized within 180 days or other applicable timeframe?* (AR.OT.OTDEFECTCAT.R) (detail) 195.452(l)(1)(ii) (195.452(f)(4); 195.452(h)(2))

Notes

N/A-no other technology used

Assessment and Repair - Integrity Assessment Via Pressure Test

4. Conduct of Pressure Tests *From the review of the results of pressure tests, do the test records validate the pressure test?* (AR.PTI.PRESSTESTRESULT.R) (detail) 195.452(l)(1)(ii) (195.452(f)(2); 195.452(c))

Notes

N/A-no pressure testing completed for integrity assessment.

5. Conduct of Pressure Tests *Was the pressure test conducted in accordance with procedures?* (AR.PTI.PRESSTESTRESULT.O) (detail) 195.452(j)(5)(ii) (195.452(c)(1)(i)(b))

Notes

N/A-no pressure testing completed for integrity assessment.

Assessment and Repair - Repair Criteria

3. Remedial Actions (IM) *Are anomaly remediation and documentation of remediation adequate?* (AR.RC.REMEDIATION.O) (detail) 195.452(h) (195.402(a); 195.402(c)(14); 195.422(a); 195.569; 195.589(c))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

Assessment and Repair - Repair Methods and Practices

2. Safety While Making Repair *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?* (AR.RMP.SAFETY.O) (detail) 195.422(a) (195.402(c)(14))

Notes

N/A-no repairs witnessed during inspection

4. Permissible Repair Methods *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?* (AR.RMP.METHOD.R) (detail) 195.404(c)(1) (195.422(a); 195.422(b); 195.452(h)(1))

Notes

N/C-ILI run occurred in April 2015. Results not yet available

5. Qualification of Personnel Performing Pipeline Repair *From the review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?* (AR.RMP.REPAIRQUAL.R) (detail) 195.505(b) (195.507(a); 195.505(c); 195.452(h)(1))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

6. Repair Records *From the review of the results of integrity assessment and remediation projects and/or field observation, do repair records document all information needed to understand the conditions of the pipe and its environment and provide the information needed to support the Integrity Management risk model?* (AR.RMP.PIPECONDITION.R) (detail) 195.404(c)(1) (195.404(c)(2))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

7. Replacement Components *From the review of the results of integrity assessment and remediation projects and/or field observation, were components that were replaced constructed to the same or higher standards as the original component?* (AR.RMP.REPLACESTD.R) (detail) 195.422(b)

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

9. Welder Qualification *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?* (AR.RMP.WELDERQUAL.R) (detail) 195.214(a) (195.214(b); 195.222(a); 195.222(b); 195.452(h)(1))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

10. Repair of Weld Defects *From the review of the results of integrity assessment and remediation projects, were weld defects repaired in accordance with §195.226 or §195.230?* (AR.RMP.WELDQUAL.R) (detail) 195.226(a) (195.226(b); 195.226(c); 195.230(a); 195.230(b); 195.230(c); 195.452(h)(1))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

11. Inspection of Welds *From the review of the results of integrity assessment and remediation projects, were welds inspected and examined in accordance with 195.228 or 195.234?* (AR.RMP.WELDINSPECT.R) (detail) 195.228(a) (195.228(b); 195.234(a); 195.234(b); 195.234(c); 195.234(d); 195.234(e); 195.452(h)(1))

Notes

N/C-Reviewed during July 2014 IMP inspection. ILI run occurred in April 2015. Results not yet available

13. Crack Repair Criteria *If the IM risk assessment and integrity assessments found cracks, SCC, or crack like features cracking to be a threat on pipeline segments, have remedial actions been taken to address integrity issues when assessment criteria have been exceeded?* (AR.RMP.CRACKREMEDIATION.R) (detail) 195.452(l)(1)(ii) (195.452(f)(3))

Notes

SAT-Reviewed during July 2014 IMP inspection. This issue was discussed with Tidewater and we went over changes to IMP as a result of 2014 IMP Inspection. ILI run occurred in April 2015. Results not yet available

Integrity Management - High Consequence Areas

3. IMP High Consequence Areas HCA Identification *Do records show that locations and boundaries of HCA-affecting segments are correctly identified and maintained up-to-date?* (IM.HC.HCALOCATION.R) (detail) 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a); 195.452(b)(2); 195.452(d)(3))

Notes

SAT

4. IMP High Consequence Areas HCA Identification *Are locations and boundaries of segments that can affect HCAs correctly identified and maintained up-to-date?* (IM.HC.HCALOCATION.O) (detail) 195.452(b)(5) (195.452(a); 195.452(b)(2); 195.453(f)(1))

Notes

SAT

Integrity Management - Preventive and Mitigative Measures

2. P&M Measures Actions Considered *Is there documentation of preventive and mitigative actions that have been considered and implemented?* (IM.PM.PMMGENERAL.R) (detail) 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))

Notes

SAT

3. P&M Measures Actions Implemented *Have preventive and mitigative actions been implemented as described in the records?* (IM.PM.PMMIMPLEMENT.O) (detail) 195.452(f)(6) (195.452(i)(1); 195.452(i)(2); 195.452(i)(3); 195.452(i)(4))

Notes

N/A-have not implemented. Will install MOVs at each end of 3-six inch lines to Tesoro later in 2015. Currently have check valves at each end of 4" BNSF line, but not part of PMMs.

10. P&M Measures Leak Detection Capability Evaluation *Do records indicate that all required and other relevant leak detection evaluation factors have been adequately evaluated?* (IM.PM.IMLEAKDETEVAL.R) (detail) 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(3))

Notes

SAT

15. P&M Measures EFRD Need Evaluation *Have identified EFRD projects been implemented as planned?* (IM.PM.PMMEFRD.O) (detail) 195.452(i)(4)

Notes

SAT-Nustar (former operator) did an EFRD evaluation of 4" BNSF line and results indicate not necessary.

Integrity Management - Quality Assurance

2. Performance Measures *Does the operator's evaluation of the selected performance measures provide meaningful insight into integrity management program performance?* (IM.QA.IMPERFMEAS.R) (detail) 195.452(l)(1)(ii) (195.452(f)(7); 195.452(k))

Notes

N/C-Reviewed during July 2014 IMP inspection

Integrity Management - Risk Analysis

7. Risk Analysis Input Information *Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?* (IM.RA.RADATA.O) (detail) 195.452(f)(3) (195.452(g))

Notes

N/C-Reviewed during July 2014 IMP inspection

Maintenance and Operations - Low-Stress Rural Pipelines

3. Categorizing Rural Low Stress Pipelines *Are locations and boundaries of segments that can affect a USA correctly identified?* (MO.LS.CATEGORIZATION.O) (detail) 195.12(b) (195.12(b)(1); 195.12(b)(2); 195.12(b)(3); 195.452(a))

Notes

N/A-no rural low stress pipelines

Reporting - Notices and Reporting

5. Notifications *Has notification been made if Other Technology is used, technology is unavailable, the 5 year reassessment interval cannot be met, remediation schedule cannot be met and pressure cannot be reduced, or a pressure reduction exceeds 365 days?* (RPT.NR.NOTIFICATIONS.R) (detail) 195.452(l)(1)(ii) (195.452(m))

Notes

N/A-no use of other technology

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