

PHMSA Form 15 Question Set (IA Equivalent)  
PHMSA (OQ) FIELD INSPECTION FORM

|   |   |   |
|---|---|---|
| <b>Name of Operator:</b>                          | Akzo Nobel Pulp and Performance Chemicals, Inc. | Insp. ID 6198                                   |
| <b>OPID No. 32358</b>                             | <b>Unit ID No.</b>                              |   |
| <b>HQ Address:</b>                                | <b>System/Unit Name &amp; Address:</b>          |   |
| 1775 West Oak Commons Court<br>Marietta, GA 30062 | 2701 Road "N" NE<br>Moses Lake<br>WA            |   |
| <b>Co. Official:</b>                              | Jimmy Jordan, Corporate HSE Manager             | <b>Phone No.:</b> (509) 765-6400                |
| <b>Phone No.:</b>                                 | 662-240-8613 Office                             | <b>Fax No.:</b> (509) 765-5557                  |
| <b>Fax No.:</b>                                   | 662-240-8657 Fax                                | <b>Emergency Phone No.:</b> (509) 764-1500      |
| <b>Emergency Phone No.:</b>                       | None provided                                   |   |
| <b>Persons Interviewed</b>                        | <b>Title</b>                                    | <b>Phone No.</b>                                |
| Robert Cosentino                                  | President & CEO, Cosentino Consulting Inc.      | 360.200.4959                                    |
| Lind Bingham                                      | Mgr. HSE and Logistics                          | 509.765.6400                                    |
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| <b>State Representative(s):</b> Dave Cullom       |   | <b>Inspection Date(s)</b> 9/15/2015 – 9/16/2015 |
| <b>Records Location:</b>                          |   | Moses Lake, WA                                  |

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| <b>Unit Description:</b>   |
| 8-inch PE system which operates at 15 psig. Compressors are incapable of exceeding this pressure. The line is about 2700 ft in length. Most of the system is in Akzo Nobel's and Simplot's property. The operator was assisted by Bob Cosentino. |
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| <b>Portion of Unit Inspected:</b>  |
| This unit was the plant in Moses Lake on Road "N"  |
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| <p><b>Sat+ - Exceeds requirements/exemplary performance</b></p> <p><b>Sat - Meets requirements</b></p> <p><b>Con - "Concern" meets requirements, but is an area of recommendation and/or area that if not addressed may lead to non-compliance</b></p> <p><b>Unsat - Does not meet requirements</b></p> <p><b>N/A - Not Applicable</b></p> <p><b>N/C - Not Checked</b></p> |
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## Training and Qualification - Operator Qualification

**1. Operator Qualification Plan and Covered Tasks (detail)** *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks? (TQ.OQ.OQPLAN.P) (detail)*

192.805(a) (192.801(b))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**

Yes, it is Rev 0, dated October 10. 2008

**2. Reevaluation Intervals for Covered Tasks (detail)** *Does the process establish and justify requirements for reevaluation intervals for each covered task? (TQ.OQ.REEVALINTERVAL.P) (detail)*

192.805(g)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**

See section 5.12

**3. Contractors Adhering to OQ Plan (detail)** *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan? (TQ.OQ.OQPLANCONTRACTOR.P) (detail)*

192.805(b) (192.805(f); 192.805(c))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**

See section 3.3.3

**4. Contractor and Other Entity Qualification (detail)** *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified? (TQ.OQ.OQCONTRACTOR.P) (detail)*

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**

See section 3.3.3

**6. Contractor and Other Entity Qualification (detail)** *Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OQ.OQCONTRACTOR.R) (detail)*

192.807(a) (192.807(b))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      |     |         |       | X  |    |

**Notes**

Yes, Akzo has a copy of the contractors OQ records if needed. No contractors have performed covered tasks since the last inspection.

**7. Management of Other Entities Performing Covered Tasks (detail)** Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OQ.OTHERENTITY.R) (detail)

192.805(b) (192.805(c); 192.803)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      |     |         |       | X  |    |

**Notes**  
N/A, none of these agreements exist.

**8. Evaluation Methods (detail)** Are evaluation methods established and documented appropriate to each covered task? (TQ.OQ.EVALMETHOD.P) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
See section 5.3 & 5.8 and Section 6  
  
MEA is the primary method used

**9. Evaluation Methods (detail)** Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
MEA is the method to evaluate.

**10. Abnormal Operating Conditions (detail)** Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)

192.803

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
See section 6.1 & 6.2  
  
MEA is the primary method used.

**11. Abnormal Operating Conditions (detail)** Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
See section 6.1 & 6.2  
  
MEA is the primary method used.

**12. Qualification Records for Personnel Performing Covered Tasks (detail)** *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?* (TQ.OQ.RECORDS.R) (detail)

192.807

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      |     |         | X     |    |    |

**Notes** There were two leak surveys being performed by an employee that exceeded the 3 year requalification interval. These surveys were performed in January and February, 2015 with qualifications that were not current. The operator did not follow their procedure to ensure that there was no lapse in qualifications. The re-evaluation interval is three years per the operator qualification manual in section 5.12.

**13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail)** *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition?* (TQ.OQ.MERGERACQ.P) (detail)

192.805(b) (192.803)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      |     |         |       | X  |    |

**Notes**  
N/A, The pipeline has dedicated Simplot deliveries.

**14. Training Requirements (Initial, Retraining, and Reevaluation) (detail)** *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?* (TQ.OQ.TRAINING.P) (detail)

192.805(h)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
See section 5.11 & 5.12 and section 6 – verified

**16. Covered Task Performed by Non-Qualified Individual (detail)** *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?* (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
See section 3.3.4 & 5.1.6 - Verified

**17. Personnel Performance Monitoring (detail)** *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
See section 5.14 & 5.15 – Verified

**19. Program Performance and Improvement (detail)** *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
See section 8.1 - Verified

**21. Management of Changes (detail)** *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
In section 8 - Verified

**22. Notification of Significant Plan Changes (detail)** *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

| Sat+ | Sat | Concern | Unsat | NA | NC |
|------|-----|---------|-------|----|----|
|      | X   |         |       |    |    |

**Notes**  
In section 8.2.6 - Verified

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