Name of Operator:	J.R. Simplot C	Company, Moses Lake	Insp. ID 6200				
<b>OPID No.</b> 32395			Unit ID No. J.R. Simplot Company				
HQ Address:			System/Unit Name & Address:				
Simplot			Simplot				
6360 South Federal Way			14121 Wheeler Road, NE				
Boise, ID 83716-9617		Moses Lake WA 9883	7				
Operator Official:	Mark McKellar,		Address:	Simplot			
_	President		City:	14121 Wheeler Road, NE			
Phone:	208-384-8225		State:	Moses Lake WA			
Emergency Phone/Cell: 5	509-765-3443		Zip Code:	98837			
Persons Interview	ved	Title		Phone No.			
Robert Cosentin	.0	President & CEO, Co	sentino Consulting Inc.	360.200.4959			
Lance Carter		Environmental Manager		509-793-1188			
State Representative(s): D	Dave Cullom	Inspection I	Date(s) September 14, 2	015			
Records Location:		Moses Lake,	WA				

## **Unit Description:**

J.R. Simplot potato processing facility located in Moses Lake includes a bio gas digester, non-jurisdictional compressor, and 8-inch diameter high density polyethylene (HDPE) bio gas transmission pipeline in Grant County. The pipeline is a Class 2 Location. The line was pressure tested at 90 psig and operates at 15 psig MAOP. There is no direct relief or worker/monitor system for overpressure protection. The compressor pump curve was looked at and demonstrates that over pressurization cannot occur given the current configuration. (From Dave Cullom 2013 Standard Audit)

# **Portion of Unit Inspected:**

Operator Qualification program as implemented by Robert Cosentino for JR Simplot using MEA as the training material and records management system.

Sat - Exceeds requirements/exemplary performance

Sat – Meets requirements

tes , dated July 24 <sup>th</sup> , 2009  Reevaluation Intervals for Covered Tasks (detail) Does the process establish and justify requirements for valuation intervals for each covered task? (TQ.OQ.REEVALINTERVAL.P) (detail)						
Aining and Qualification - Operator Qualification  Operator Qualification Plan and Covered Tasks (detail) Is there an OQ plan that includes covered tasks, the basis used for identifying covered tasks? (TQ.OQ.OQPLAN.P) (detail)  805(a) (192.801(b))  Sat + Sat Concern Unsat NA NC  X  See dated July 24th, 2009  Reevaluation Intervals for Covered Tasks (detail) Does the process establish and justify requirements for aduation intervals for each covered task? (TQ.OQ.REEVALINTERVAL.P) (detail)						
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			ere an OQ plar	n that includ	des covere	ed tasks,
192.805(a) (192.801(b))	Sat+	Sat	Concern	Unsat	NA	NC
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Notes						
Yes, dated July 24 <sup>th</sup> , 2009						
2. Describing Intervals for Covered Tasks (d	atail\ a					
			ocess establish	ana justiry	requirem	ents for
192.805(g)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
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See section 5.12						
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Through Amdt. 192-116

**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
	Χ				

#### 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
	Χ				

#### **Notes**

Records available

**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
	Χ				

#### **Notes**

See section 6.1 & 6.2

MEA training materials provide the course work necessary for evaluating each covered task.

**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	
	Y					_

### Notes

See section 6.1 & 6.2

MEA training materials provide the course work necessary for evaluating each covered task.

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

Sat+	Sat	Concern	Unsat	NA	N C
	Χ				

### **Notes**

We looked at qualifications for 2013 to the present for leakage survey and abnormal operating condition recognition.

# 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, pipeline dedicated between Simplot facilities. It is an asset that stays with the company.

**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

Section 5.11 & 5.12 and section 6

**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

### **Notes**

In section 3.3.4 & 5.1.6

**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

In section 5.14 & 5.15

**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
		Χ				

# Notes

See section 8.1

**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	N C
		Χ				
Notes						
See section 8						

**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						
See section 8.2.6						

**Acceptable Use:** Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.