

Inspection Output (IOR)

Generated on 2018.September.28 12:08

Inspection Information

Inspection Name	Targa Liquid IMP	Operator(s)	TARGA SOUND TERMINAL LLC (38921)	Plan Submitted	09/13/2018
Status	PLANNED	Lead	Dennis Ritter	Plan Approval	09/17/2018 by Joe Subsits
Start Year	2018	Team Members	Derek Norwood	All Activity Start	09/10/2018
System Type	HL	Supervisor	Joe Subsits	All Activity End	09/14/2018
Protocol Set ID	HL.2017.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Targa Liquid IMP Inspection: 7562

Description:

The Targa pipeline consists of approximately 14,000 feet of 10" 0.365 wall X52 FBE coated DRL. The 10-inch pipeline was constructed in 2012 mostly installed using HDD. The line begins on F St on the west side of the Tacoma tide flats and transports refined products northeast across the flats to Targa Sound Terminal on Marine View Drive. 95% of the pipeline is more than 40 feet deep--45 feet deep under the Puyallup River and 148 feet deep under the Blair and Hylebos Waterways. There are two CP test points, 1-booster pump station (two 200-hp product pumps) at Olympic's DF and 1 breakout tank necessary to relieve surges (Tank 205 also new in 2012). The Maximum Operating Pressure is 300 psig, however the pressure relief is set for 265 psig. The entire line is in a HCA-High Population, drinking water, navigable water, ecologically sensitive.

Inspection Summary:

AFODs

Pre-inspection	2
Inspection	2
Post-inspection	2

Begin inspection: 9/10/18

End Inspection: 9/11/18

Exit Interview: 9/11/18 15:30 Matthew Kolata, Tim Huffer, Tidewater

Inspection rational:

The Targa pipeline carries refined products. The line is 6 years old, very deep and installed using HDD in a marine estuary environment (no rocks). The UTC monitored construction of the pipeline and checked records regularly. The most recent ILI run occurred in 2015. No anomalies were noted. There have been no accidents since start up in 2012. The entire line is located within a HCA. Therefore this inspection focused on are they effectively implementing and managing their plan versus typical risk factors like corrosion issues or 3rd party damage. The following IA groups of questions were selected based on the risks associated with the line.

HL IM

Core

Findings:

As noted in the inspection report, there are two unsat for not performing an overland spread analysis on the line at the pump station and at the Targa Sound Terminal. Both of these locations are located in areas adjacent to City streets with storm drains. Product could leave the facility and potentially affect water ways. There was also one concern based on the condition of the coating on above ground piping found at the pump station adjacent to Olympic's DF. It was flaking around pipe joints. Targa indicated it was in the process of being painted.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	Targa IMP 7562	Targa Liquid Integrity Management Program	other	WUTC	Offshore GOM CO2 HVL Abandoned	168	168	168	168	100.0%

a. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Targa IMP 7562	HL IM, Core	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Procedures and Records	--	09/10/2018	09/14/2018	n/a	all planned questions	all assets	all types	168	168	168	168	100.0%

a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

b. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Procedures and Records	COMPLETED	09/13/2018	Procedures and Records	Targa IMP 7562

Results (Unsat, Concern values, 3 results)

IM.HC: High Consequence Areas

1. Question Result, ID, References **Unsat, IM.HC.HCAOVERLAND.P, 195.452(f)(1) (195.452(a))**

Question Text *Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*

Assets Covered **Targa IMP 7562**

Result Issue Summary IMP Section 1.3, Determination of Hazard Zones. Currently plan looks at running a trace model for could affect areas in HCAs. This line is entirely within HCA. Section 1.3, Determination of Hazard Zones, states, "Pipelines that are located within the boundaries of an HCA have th potential to impact the HCA." However, there is not a process noted to quantify the potential impact. For lines located outside the HCA, Targa states the following, "Spill point analysis shall be performed all along the pipeline and resulting spill 'footprint' integrated into GIS to determine when a release could affect an HCA located some distance from the pipeline." This same analysis should be performed inside the HCA.

Standard Issues A2 (Significant impact/limited occurrence) : 195.452(f)(1) : Process for overland spread analysis was inadequate

Result Notes Targa is working with Ecology on a new model for areas where the pipeline comes above ground: takeoff, valve site, terminal).

IMP Section 1.3, Determination of Hazard Zones. Currently plan looks at running a trace model for could affect areas in HCAs. This line is entirely within HCA. Section 1.3, Determination of Hazard Zones, states, "Pipelines that are located within the boundaries of an HCA have th potential to impact the HCA." However, there is not a process noted to quantify the potential impact. For lines located outside the HCA, Targa states the following, "Spill point analysis shall be performed all along the pipeline and resulting spill 'footprint' integrated into GIS to determine when a release could affect an HCA located some distance from the pipeline." This same analysis should be performed inside the HCA.

2. Question Result, ID, References **Unsat**, IM.HC.HCAOVERLAND.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that the analysis of overland spread is consistent with the documented process?*

Assets Covered Targa IMP 7562

Result Issue Summary After revising their process, Targa needs to run overland spread analysis for the pipeline in areas where it could reach drainage ways (pump station, terminal)

Standard Issues A2 (Significant impact/limited occurrence) : 195.452(l)(1)(ii) : No record/documentation.

Result Notes For the analysis already performed in FRP Chapter 6, OK.

No overland flow analysis. Do not know where or how much product pools or spreads and where it goes should it hit a storm drain or ditch-specifically at the pump station and terminal. As the line is very deep between these points the analysis only needs to occur at each end.

TD.ATM: External Corrosion - Atmospheric

3. Question Result, ID, References **Concern**, TD.ATM.ATMCORRODEINSP.O, 195.583(c) (195.581(a))

Question Text *Is aboveground pipe that is exposed to atmospheric corrosion protected?*

Assets Covered Targa IMP 7562

Result Issue Summary Targa needs to send evidence lines were coated.

Result Notes Some flaking noted at pump station. This is in the process of being coated.

Report Parameters: Results: Unsat,Concern

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