

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	7567		
Inspector Name & Submit Date	Derek Norwood/October 15, 2018		
Chief Engineer Name & Review Date	Joe Subsits/October 22, 2018		
Operator Information			
Name of Operator:	McChord Pipeline Company	OPID #:	31049
Name of Unit(s):	McChord Pipeline Company		
Records Location:	3001 Marshall Avenue, Tacoma, WA		
Date(s) of Last Review:	8/8-8/10/2016	Inspection Date(s)	10/8-10/10/2018

<p>Inspection Summary: This standard inspection took place October 8-10, 2018. Records were reviewed at US Oil Refinery in Tacoma. Records consisted of cathodic protection, training, OQ, drug and alcohol, valve inspections and review of McChord's response during the 2017 spill in Parkland, WA. During the field inspection we reviewed OQ records for personnel performing covered tasks, performed CP reads, casing reads, checked the rectifier, ROW patrol and valve operation/inspection. No violations or areas of concern were noted during the inspection.</p>

HQ Address: 3001 Marshall Avenue Tacoma, WA		System/Unit Address: 3001 Marshall Avenue Tacoma, WA	
Co. Official:	Brady Winder	Phone No.:	
Phone No.:	253-680-3220	Fax No.:	
Fax No.:		Emergency Phone No.:	
Emergency Phone No.:	253-593-6085		
Persons Interviewed	Title	Phone No.	
Nick Peelo	Chief Engineer	253-405-4839	
John Williamson	Senior Inspector	253-377-0933	
Brady Winder	President	253-680-3220	
Douglass Barkley	Chief Inspector	253-606-4432	
Joel Roppo			

Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Reviewed annual reports for 2016 and 2017 calendar years, information appears to be accurate and consistent. Reviewed accident report from UTC and McChord for spill in August 2017, no discrepancies were noted and information appears to be accurate.

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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:	8/11/2015
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	
Any revisions to O&M manual since last review? Yes <input checked="" type="checkbox"/> No If yes, review revisions made.		

Comments:

REPORTING		S	U	NA	NC		
1.	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?		X			
2.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction				X	
3.	480-75-620	Was MOP changed based on hydrotest? Report submitted?				X	
4.	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; 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. Called UTC at 13:10 8/2/17 for spill in 2017		X			
5.	480-75-630(2)	Written reports to the commission within 30 calendar days of the incident. The report must include the following: 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. 30 day sent to UTC on 8/30/17		X			
6.	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. Notified the UTC at 13:10, pipeline was hit at 12:12 on 8/2/17		X			
7.	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)					
8.	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) Submitted 8/9/17		X			

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9.	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 without facility locates first being completed?			X	
10.	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? Note: Records maintained for two years and made available to the commission upon request.	X			
11.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? Emails sent to SEFNCO in August 2017				
12.	480-75-630(5)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 	X			
13.	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			
14.	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			
15.	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:
Item 2 – McChord has had no construction >100 feet
Item 3 – McChord did not change MOP during this inspection period
Item 9 – This event has not occurred
Item 15 – McChord has not witnessed these events

OPERATION & MAINTENANCE			S	U	NA	NC
16.	480-75-620	Change in MOP? Changed based on hydrotest?			X	
17.	480-75-640	Depth of cover surveys and mitigation			X	
18.	480-75-500	Pipe movement study per API 1117			X	
19.	480-75-300 (3)	Leak detection and alarm records Alarm detected leak of 546 gallons within 2 minutes. Line hit at 12:12 and system alarmed at 12:14	X			
20.	480-75-320	Surge analysis done? Surge analysis completed in 1999	X			

Comments:
Item 16 – McChord has not changed their MOP
Item 17 – Last performed in 2014, next inspection scheduled for 2019
Item 18 – McChord has not moved or lowered their pipeline

CORROSION CONTROL			S	U	NA	NC
21.	480-75-510	Corrosion remediation within 90 days			X	

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Comments:
Item 21 – No corrosion deficiencies found

FIELD REVIEW			S	U	N/A	N/C
22.	480-75-540	Markers at exposed areas	X			
23.	480-75-320	Relief Device set at or below MOP Thermal reliefs set at 720 psig, MOP is 720 psig	X			
24.	480-75-300	Leak Detection – 8% in 15 Minutes Reviewed SCADA screens and data for accident in 2017	X			
25.	480-75-300	Leak detection at flow and no flow conditions	X			
26.	480-75-330	Do Breakout Tanks have independent overfill alarms?			X	

Comments:
Item 26 – McChord has no breakout tanks

EXIT INTERVIEW	
Exit Interview Conducted? Yes Items covered: Discussed taking AC reads during annual CP surveys in order to make a determination on AC interference, discussed including pump station and valves as part of the pipeline system. We also talked about their response to the 2017 spill and that their public and excavator outreach seems to be very good following the spill.	Date: 10/10/2018

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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>