

Inspection Output (IOR)

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Inspection Information

| | | | | | |
|-----------------|-----------------|-------------|--|----------------------|------------|
| Inspection Name | 7851 Nouryon OQ | Operator(s) | NOURYON PULP AND PERFORMANCE CHEMICALS LLC (32358) | Plan Submitted | 10/17/2019 |
| Status | STARTED | Lead | Anthony Dorrrough | Plan Approval | -- |
| Start Year | 2019 | Director | | All Activity Start | 10/24/2019 |
| System Type | HL | | | All Activity End | 10/24/2019 |
| Protocol Set ID | HL.2019.01 | | | Inspection Submitted | -- |
| | | | | Inspection Approval | -- |

Inspection Summary

Nouryon Pulp and Performance Chemicals LLC (formerly Akzo Nobel) operates 0.45 miles of 8" PE pipeline. The pipeline transports non-odorized hydrogen gas from Nouryon's chemical plant to JR Simplot's boiler. Staff reviewed operator qualification process, procedures and records. The field inspection consisted of observing a qualified individual perform a randomly selected qualified task.

Scope (Assets)

| Short # Label | Long Label | Asset Type | Asset IDs | Excluded Topics | Planned | Required | Inspected | Total | Required % Complete |
|---------------|--|------------|-----------|--|---------|----------|-----------|-------|---------------------|
| 1. Nouryon | Nouryon Pulp and Performance Chemicals LLC | unit | -- | Offshore GOM Crosses Nav. Reg Rural Gather Rural Low Stress Abandoned | 54 | 54 | 54 | 54 | 100.0% |

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

Plans

| # | Plan Assets | Focus Directives | Involved Groups/Subgroups | Qst Type(s) | Extent | Notes |
|----|-------------|------------------|---------------------------|-------------|--------|-------|
| 1. | Nouryon | n/a | TQ | P, R, O, S | Detail | |

Plan Implementations

| Activity # Name | SMART Act# | Start Date End Date | Focus Directives | Involved Groups/Subgroups | Qst Assets | Type(s) | Planned | Required | Inspected | Total | Required % Complete |
|-----------------|------------|--------------------------|------------------|---------------------------|------------|-----------|---------|----------|-----------|-------|---------------------|
| 1. Nouryon OQ | -- | 10/24/2019 10/24/2019 | n/a | all planned questions | all assets | all types | 54 | 54 | 54 | 54 | 100.0% |

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

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

Forms

| No. | Entity | Form Name | Status | Date Completed | Activity Name | Asset |
|-----|-----------------|--------------|---------|----------------|---------------|-------|
| 1. | Attendance List | Nouryon OQ 1 | STARTED | -- | Nouryon OQ | -- |

Results (all values, 54 results)

56 (instead of 54) results are listed due to re-presentation of questions in more than one sub-group.

TD.CP: External Corrosion - Cathodic Protection

- Question Result, ID, References: **NA, TQ.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h))** (also presented in: TQ.QU)

Question Text: *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*

Assets Covered: **Nouryon**

Result Notes: **No such relevant facilities/equipment existed in the scope of inspection review.**
- Question Result, ID, References: **NA, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b))** (also presented in: TQ.QU)

Question Text: *Is qualification of supervisors in corrosion control procedures documented?*

Assets Covered: **Nouryon**

Result Notes: **No such relevant facilities/equipment existed in the scope of inspection review.**

TQ.PROT9: OQ Protocol 9

- Question Result, ID, References: **Sat, TQ.PROT9.TASKPERFORMANCE.O, 195.501(a) (195.509(a))**

Question Text: *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*

Assets Covered: **Nouryon**

Result Notes: **The product is Hydrogen which cannot be odorized so to add a measure of added safety Nouryon conducts monthly leak surveys. Taylor Stout and Jacob St. Mary and Lind Bingham perform this task and were verified by staff.**
- Question Result, ID, References: **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 195.501(a) (195.509(a))**

Question Text: *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered: **Nouryon**
- Question Result, ID, References: **Sat, TQ.PROT9.AOCRECOG.O, 195.501(a) (195.509(a))**

Question Text: *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered: **Nouryon**
- Question Result, ID, References: **Sat, TQ.PROT9.VERIFYQUAL.O, 195.501(a) (195.509(a))**

Question Text: *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered: **Nouryon**

Result Notes: **Staff observed Taylor Stout**
- Question Result, ID, References: **NA, TQ.PROT9.CORRECTION.O, 195.501(a) (195.509(a))**

Question Text: *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered: **Nouryon**

Result Notes: **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.OO: Operator Qualification

8. Question Result, ID, References **Sat, TQ.OO.OOPLAN.P, 195.505(a) (195.501(b), 195.3(c)(B)(9))**
 Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*
 Assets Covered **Nouryon**
 Result Notes **Section 4- Identification of Covered tasks**
9. Question Result, ID, References **Sat, TQ.OO.REEVALINTERVAL.P, 195.505(g)**
 Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*
 Assets Covered **Nouryon**
 Result Notes **Section 5.11- Re-Evaluation Criteria**
10. Question Result, ID, References **Sat, TQ.OO.NONQUALIFIED.P, 195.505(c)**
 Question Text *Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?*
 Assets Covered **Nouryon**
 Result Notes **Section 5.16- Non-Qualified Individuals**
11. Question Result, ID, References **Sat, TQ.OO.EVALMETHOD.P, 195.505(b) (195.503, 195.509(d), 195.509(e))**
 Question Text *Are evaluation methods established and documented appropriate to each covered task?*
 Assets Covered **Nouryon**
 Result Notes **Initial evaluation is with online training. (See documentation copy)**
12. Question Result, ID, References **NA, TQ.OO.OOCONTRACTOR.R, 195.507(a) (195.507(b))**
 Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
 Assets Covered **Nouryon**
 Result Notes **No such activity/condition was observed during the inspection.**
13. Question Result, ID, References **Sat, TQ.OO.RECORDS.R, 195.507(a) (195.507(b))**
 Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
 Assets Covered **Nouryon**
14. Question Result, ID, References **Sat, TQ.OO.TRAINING.P, 195.505(h)**
 Question Text *Does the operators program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*
 Assets Covered **Nouryon**
 Result Notes **Nouryon prints out MEA sheet of qualified individuals each year to check for qualification, retraining and reevaluation.**
15. Question Result, ID, References **Sat, TQ.OO.TRAINING.R, 195.507(a) (195.507(b), 195.505(h))**
 Question Text *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?*
 Assets Covered **Nouryon**
16. Question Result, ID, References **Sat, TQ.OO.OOPLANCONTRACTOR.P, 195.505(a) (195.505(f))**
 Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*
 Assets Covered **Nouryon**
 Result Notes **Section 3.3.3- Third Party Personnel**
17. Question Result, ID, References **NA, TQ.OO.OOCONTRACTOR.P, 195.505(b) (195.505(c), 195.505(d), 195.505(e), 195.505(f))**
 Question Text *Are contractor organizations or other entities that perform covered tasks qualified?*

Assets Covered **Nouryon**

Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

18. Question Result, ID, References **Sat, TQ.OQ.CONTRACTOREQUIV.P, 195.505(h)**

Question Text *Does the OQ plan assure that procedures on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*

Assets Covered **Nouryon**

Result Notes **Section 3.3.3 - F & G - Jacobe St. Mary is the Nouryon Pipeline Manager**

19. Question Result, ID, References **NA, TQ.OQ.OTHERENTITY.R, 195.505(b) (195.505(c), 195.503)**

Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

20. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.P, 195.503 (195.505(b))**

Question Text *Does the OQ plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*

Assets Covered **Nouryon**

Result Notes **Section 6- Qualification Procedures - Nouryon has a paper copy backup to this electronic data.**

21. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.R, 195.507(a) (195.507(b), 195.503)**

Question Text *Do records indicate evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered **Nouryon**

22. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.O, 195.503**

Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions (AOCs)?*

Assets Covered **Nouryon**

23. Question Result, ID, References **Sat, TQ.OQ.PERFMONITOR.P, 195.505(d) (195.505(e))**

Question Text *Does the OQ program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195, or there is reason to believe an individual is no longer qualified to perform covered tasks?*

Assets Covered **Nouryon**

Result Notes **Section 5.12- 5.15**

24. Question Result, ID, References **NA, TQ.OQ.PERFMONITOR.R, 195.505(d) (195.505(e))**

Question Text *Does the operator have records to demonstrate that they have evaluated individuals who may have contributed to an incident/accident while performing a covered task or where there is reason to believe that an individual may have no longer been qualified to perform a covered task?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

25. Question Result, ID, References **Sat, TQ.OQ.OOPLAN.O, 195.505(h)**

Question Text *Do individuals performing covered tasks demonstrate adequate skills and knowledge?*

Assets Covered **Nouryon**

26. Question Result, ID, References **Sat, TQ.OQ.MOC.P, 195.505(f)**

Question Text *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)?*

Assets Covered **Nouryon**

Result Notes **Section 8 - MOC**

27. Question Result, ID, References **Sat, TQ.OQ.CHANGENOTIFY.P, 195.505(i)**
 Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*
 Assets Covered **Nouryon**
28. Question Result, ID, References **NA, TQ.OQ.CHANGERECD.R, 195.505(i) (195.505(f))**
 Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*
 Assets Covered **Nouryon**
 Result Notes **No such activity/condition was observed during the inspection.**

TQ.QU: Qualification of Personnel - Specific Requirements

29. Question Result, ID, References **NA, TQ.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h))** (also presented in: TD.CP)
 Question Text *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*
 Assets Covered **Nouryon**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
30. Question Result, ID, References **NA, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b))** (also presented in: TD.CP)
 Question Text *Is qualification of supervisors in corrosion control procedures documented?*
 Assets Covered **Nouryon**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
31. Question Result, ID, References **NA, TQ.QU.CONTROLLER.P, 195.446(h) (195.505(b))**
 Question Text *Does the process establish, maintain, and review controller qualifications, abilities, and performance metrics, with particular attention to response to abnormal operating conditions?*
 Assets Covered **Nouryon**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
32. Question Result, ID, References **NA, TQ.QU.CONTROLLER.R, 195.446(h) (195.507(a), 195.507(b))**
 Question Text *Is controller training and qualification documented?*
 Assets Covered **Nouryon**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
33. Question Result, ID, References **NA, TQ.QU.CONTROLLER.O, 195.446(b) (195.446(c), 195.505(b))**
 Question Text *Do controllers demonstrate adequate skills and knowledge?*
 Assets Covered **Nouryon**
 Result Notes **No such activity/condition was observed during the inspection.**

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

34. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTORQUAL.P, 195.204**
 Question Text *Does the process require personnel who conduct pipe or pipeline system construction inspections to be adequately trained and qualified?*
 Assets Covered **Nouryon**
 Result Notes **No such activity/condition was observed during the inspection.**
35. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTORQUAL.R, 195.204**
 Question Text *Do records indicate adequate qualification documentation for personnel who conduct pipe or pipeline system construction inspections? (TQ.QUOMCONST.INSPECTORQUAL.R) (detail)*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

36. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTORQUAL.O, 195.204**

Question Text *Does the inspector who ensures pipeline systems are installed per requirements demonstrate adequate skills and knowledge?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

37. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.P, 195.222(a) (195.222(b), Section 6 of API-1104, Section IX of ASME Boiler & Pressure Vessel Code, 195.214(a))**

Question Text *Does the process require welders to be qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?*

Assets Covered **Nouryon**

Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

38. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.R, 195.222(a) (195.214(a), 195.222(b))**

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

39. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.O, 195.222(a) (195.505(b), 195.214(a))**

Question Text *Do welders demonstrate adequate skills and knowledge?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

TQ.TRCNTRL: Training of Personnel - Dispatcher

40. Question Result, ID, References **NA, TQ.TRCNTRL.CNTRLTRAINING.P, 195.444 (195.446(e))**

Question Text *Does the process require that dispatchers are trained in the recognition of CPM alarms?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

41. Question Result, ID, References **NA, TQ.TRCNTRL.CNTRLTRAINING1130.P, 195.444 (195.505(h))**

Question Text *Do the process require dispatcher training be provided in compliance with API-1130?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

42. Question Result, ID, References **NA, TQ.TRCNTRL.CNTRLTRAINING.R, 195.444 (195.507(a), 195.507(b))**

Question Text *Is dispatcher training and qualification documented?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

43. Question Result, ID, References **NA, TQ.TRCNTRL.CNTRLTRAINING.O, 195.444 (195.505(b))**

Question Text *Do dispatchers demonstrate adequate skills and knowledge?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

TQ.TRERP: Training of Personnel - Emergency Response

44. Question Result, ID, References **Sat, TQ.TRERP.ERCONDITIONS.P, 195.403(a)(3)**

Question Text *Are conditions that are likely to cause emergencies, their consequences, and appropriate corrective action identified in the ER training?*

Assets Covered **Nouryon**

45. Question Result, ID, References **Sat, TQ.TRERP.ERFIREPROT.P, 195.403(a)(5)**

Question Text *Are the potential causes, types, sizes, and consequences of fire and appropriate use of portable fire extinguishers and other on-site fire control equipment covered in the ER training?*

Assets Covered **Nouryon**

Result Notes **Nouryon does their own emergency response - Board Production training plan -**

46. Question Result, ID, References **Sat, TQ.TRERP.ERHAZTRAINING.P, 195.403(a)(2)**

Question Text *Are the characteristics and hazards of the hazardous liquids or carbon dioxide transported covered in the ER training?*

Assets Covered **Nouryon**

Result Notes **Verified- Page 15 of plan See photos**

47. Question Result, ID, References **Sat, TQ.TRERP.ERRELEASECONTROL.P, 195.403(a)(4)**

Question Text *Are the steps necessary to control any accidental release of hazardous liquid to minimize the potential for fire, explosion, toxicity, or environmental damage identified in the ER training?*

Assets Covered **Nouryon**

Result Notes **Page 8 - Emergency Response Plan**

48. Question Result, ID, References **Sat, TQ.TRERP.ERTRAINING.P, 195.403(a)(1)**

Question Text *Does emergency response training cover the emergency procedures established under 195.402?*

Assets Covered **Nouryon**

49. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGRECORDS.R, 195.404(c) (195.403(a))**

Question Text *Is training for emergency response personnel documented?*

Assets Covered **Nouryon**

50. Question Result, ID, References **Sat, TQ.TRERP.ERTRAINING.O, 195.403(a)**

Question Text *Do emergency response personnel demonstrate adequate skills and knowledge?*

Assets Covered **Nouryon**

Result Notes **Annex 5**

51. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGREVIEW.P, 195.403(b)**

Question Text *Does the process require review of emergency response personnel performance at the required frequency?*

Assets Covered **Nouryon**

52. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGREVIEW.R, 195.404(c) (195.403(b))**

Question Text *Has review of emergency response personnel performance at the required frequency been documented?*

Assets Covered **Nouryon**

53. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGSUPERVISE.P, 195.403(c)**

Question Text *Does the process require supervisors be trained on emergency response procedures for which they are responsible?*

Assets Covered **Nouryon**

Result Notes **Annex 6 Training and Exercises/Drills**

54. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGSUPERVISE.O, 195.403(c) (195.405)**

Question Text *Do emergency response supervisors demonstrate adequate skills and knowledge?*

TQ.TROMCONST: Training of Personnel - O and M Construction

55. Question Result, ID, References **NA, TQ.TROMCONST.NDT.P, 195.234(b)(2)**

Question Text *Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel trained and qualified in procedures and in use of the testing equipment?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

56. Question Result, ID, References **NA, TQ.TROMCONST.NDT.R, 195.234(b)(2)**

Question Text *Is training for personnel, who perform nondestructive testing of welds, documented and demonstrated?*

Assets Covered **Nouryon**

Result Notes **No such activity/condition was observed during the inspection.**

Report Parameters: Results: all

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