

Inspection Output (IOR)

Generated on 2020.June.23 14:58

Inspection Information

Inspection Name	Solvay OQ Program Inspection	Operator(s)	SOLVAY CHEMICALS, INC. (32399)	Plan Submitted	01/03/2020
Status	PLANNED	Lead	David Cullom	Plan Approval	01/08/2020 by Joe Submits
Start Year	2020	Observer(s)	Scott Rukke, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity Start	06/16/2020
System Type	GT	Supervisor	Joe Submits	All Activity End	06/17/2020
Protocol Set ID	GT.2020.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

No probable violations or areas of concern were identified during this inspection.

This Operator Qualification inspection for Solvay included a review of Northwest Metal Fabrication and Pipe's (NWMFP) plan and it has been incorporated into Solvay's Operations and Maintenance Manual. NWMFP and Solvay accepts the training programs, Abnormal Operating Conditions (AOC's), and Covered Task Lists (CTL's) established by the Midwest Energy Association (MEA), Energy World Net (EWN), and the National Association of Corrosion Engineers (NACE).

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88967	Solvay Chemicals, Inc.	unit	88967	--	41	41	41	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.	88967	n/a	TQ	P, R	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Solvay OQ Program Inspection	--	06/16/2020 06/17/2020	n/a	all planned questions	all assets types	all	41	41	41	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

This inspection has no Form data entry.

Results (all values, 41 results)

45 (instead of 41) results are listed due to re-presentation of questions in more than one sub-group.

DC.COMM: Pipeline Commissioning

1. Question Result, ID, References Sat, TQ.OQ.OOPLAN.P, 192.805(a) (192.801(b)) (also presented in: TQ.OQ)
Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*
Assets Covered 88967
Result Notes The program is in the O&M Manual under Attachment I. The CT list is Appendix A: Northwest Metal Fab & Pipe Inc. Covered Task List. They use the 4 part test to identify tasks under Scope 3.0

2. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b)) (also presented in: TQ.OQ)
Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*
Assets Covered 88967
Result Notes During the standard inspection earlier this year, I reviewed Eric Larson's and Brian Yechout's OQ records. The retraining interval is task dependent and is three years unless otherwise specified. Records reviewed for OQ tasks were for NWF 2017 Brian Yechout performed tasks until Sept 2018. Task performed 9-19-18. Eric Larson performed starting 10-23-18 and 2019.

e) Re-evaluation 1) Re-evaluations are required when (i) When there is reason to believe the Individual is no longer qualified to perform a covered task (9.0). (ii) As part of an incident review (8.5) (iii)As part of a change to a covered task (9.2).

3. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: TQ.TR)
Question Text *Is training for emergency response personnel documented?*
Assets Covered 88967
Result Notes The emergency response plan uses Longview Fire Department for response in the public ROW. If there is an emergency, operations can shut down the flow. Emergency Response personnel are in plant.

4. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807 (also presented in: TQ.OQ)
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 88967
Result Notes Records reviewed for OQ tasks were for NWF 2017 Brian Yechout performed tasks until Sept 2018. Task performed 9-19-18. Eric Larson performed starting 10-23-18 and 2019.

TQ.OQ: Operator Qualification

5. Question Result, ID, References Sat, TQ.OQ.OOPLAN.P, 192.805(a) (192.801(b)) (also presented in: DC.COMM)
Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*
Assets Covered 88967
Result Notes The program is in the O&M Manual under Attachment I. The CT list is Appendix A: Northwest Metal Fab & Pipe Inc. Covered Task List. They use the 4 part test to identify tasks under Scope 3.0

6. Question Result, ID, References Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)
Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*
Assets Covered 88967
Result Notes Section 15.1b2 refers to Section 8.1 on Pg 24. Section 8.2 has the re-evaluation guidance as well.

7. Question Result, ID, References **Sat, TQ.OQ.NONQUALIFIED.P, 192.805(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 **88967**
 Result Notes **Section 8.3 pg 25 Performance of Covered Tasks by Qualified and Non-Qualified Individuals**
8. Question Result, ID, References **Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))**
 Question Text *Are evaluation methods established and documented appropriate to each covered task?*
 Assets Covered **88967**
 Result Notes **Section 12.0 Evaluation: Section 13 Evaluation Methods: Evaluation resources can be found in Appendix B**
9. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))**
 Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
 Assets Covered **88967**
 Result Notes **NWMFP is the holder of the plan. They are a contractor to Solvay, but have no contractors that work for them to manage OQ records for.**
10. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 192.807 (also presented in: DC.COMM)**
 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 **88967**
 Result Notes **Records reviewed for OQ tasks were for NWF 2017 Brian Yechout performed tasks until Sept 2018. Task performed 9-19-18. Eric Larson performed starting 10-23-18 and 2019.**
11. Question Result, ID, References **Sat, TQ.OQ.TRAINING.P, 192.805(h)**
 Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*
 Assets Covered **88967**
 Result Notes **5.0 Phases of Qualification on Page 10-14 contains this.**
12. Question Result, ID, References **Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b)) (also presented in: DC.COMM)**
 Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*
 Assets Covered **88967**
 Result Notes **During the standard inspection earlier this year, I reviewed Eric Larson's and Brian Yechout's OQ records. The retraining interval is task dependent and is three years unless otherwise specified. Records reviewed for OQ tasks were for NWF 2017 Brian Yechout performed tasks until Sept 2018. Task performed 9-19-18. Eric Larson performed starting 10-23-18 and 2019.**
- e) Re-evaluation 1) Re-evaluations are required when (i) When there is reason to believe the Individual is no longer qualified to perform a covered task (9.0). (ii) As part of an incident review (8.5) (iii)As part of a change to a covered task (9.2).
13. Question Result, ID, References **NA, TQ.OQ.OQPLANCONTRACTOR.P, 192.805(b) (192.805(f), 192.805(c))**
 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 **88967**
 Result Notes **NWMFP does not use contractors. No such event occurred, or condition existed, in the scope of inspection review.**
14. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.P, 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))**

Question Text *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*

Assets Covered 88967

Result Notes NWMFP is the holder of the plan. They are a contractor to Solvay, but have no contractors that work for them to manage OQ qualifications for.

15. Question Result, ID, References Sat, TQ.OO.OOCONTRACTOREQUIV.P, 192.805(h)

Question Text *Does the OQ plan document that the operator has assured that the processes 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 88967

Result Notes 7.2 Training Program:

Solvay and Northwest Metal Fab and Pipe Inc. have chosen Midwest Energy Association (MEA), Energy World Net (EWN), OQSG, Veriforce and National Association of Corrosion Engineers (NACE) training and qualification programs to assist in the Individual Qualification process for the Northwest Metal Fab and Pipe Inc. Operator Qualification Program. 1) Northwest Metal Fab and Pipe Inc. has asked the Operator, Solvay, to approve these Programs for training and qualification purposes. 2) Outside experts may also be utilized for specialized equipment or process training (i.e. Clockspring, manufacturer specifications).

16. Question Result, ID, References NA, TQ.OO.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)

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 88967

Result Notes No instances or records are available.

No such event occurred, or condition existed, in the scope of inspection review. The procedure is in Section 17 (Outside Certifications or Training Compliance Mutual Assistants Agreements)

17. Question Result, ID, References Sat, TQ.OO.ABNORMAL.P, 192.803

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 88967

Result Notes Appendix A – Northwest Metal Fab & Pipe Inc. Covered Task List has AOCs and the evaluation method for testing/verification.

Northwest Metal Fab & Pipe Inc. and the Operator shall accept the training programs, Abnormal Operating Conditions (AOC's), and Covered Task Lists (CTL's) established by the Midwest Energy Association (MEA), Energy World Net (EWN), and the National Association of Corrosion Engineers (NACE). The Operator and Northwest Metal Fab & Pipe Inc. may add to or modify either the AOC's or CTL's as long as both the Operator and Northwest Metal Fab & Pipe Inc. agree and adopt these changes.

Pg 43 (Section 18) has the Abnormal Operation Conditions & Response Policy

18. Question Result, ID, References Sat, TQ.OO.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

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

Assets Covered 88967

Result Notes Appendix N and P (Section 35.0) has a sample MEA checklist.

Brian Yechout's OQ records had AOC's

192 AOC e-TNG Abnormal Operating Conditions 100% Yes Course Credits 1.00 7/7/2016 192 AOC KNT Abnormal Operating Conditions 90% Yes Course Credits 1.00 7/7/2016

Eric Larson sent an evaluation from MEA for "inspection for damage" completed on 10-15-2018 showing he was evaluated on AOCs.

19. Question Result, ID, References Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))
Question Text *Does the 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 a covered task?*
Assets Covered 88967
Result Notes This is in Section 5.0(d)3 and Section 5(e)
20. Question Result, ID, References NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))
Question Text *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*
Assets Covered 88967
Result Notes No incidents/accidents. No such event occurred, or condition existed, in the scope of inspection review.
21. Question Result, ID, References Sat, TQ.OQ.MOC.P, 192.805(f)
Question Text *Does the OQ program identify how changes to processes, 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 88967
Result Notes 15.0 Program Maintenance / Management of Change The form is in Appendix G.
22. Question Result, ID, References Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i)
Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*
Assets Covered 88967
Result Notes Section 15.1c (Program Maintenance / Management of Change) has approval and notice requirements.
23. Question Result, ID, References Sat, TQ.OQ.CHANGERECD.R, 192.805(i) (192.805(f))
Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*
Assets Covered 88967
Result Notes There is a revision log, but it did not contain any significant changes.

TQ.QU: Qualification of Personnel - Specific Requirements

24. Question Result, ID, References Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))
Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*
Assets Covered 88967
Result Notes 7.2 Training Program: a) Northwest Metal Fab and Pipe Inc. has National Association of Corrosion Engineers (NACE) training and qualification programs to assist in the Individual Qualification process for the Northwest Metal Fab and Pipe Inc. Operator Qualification Program. 1) Northwest Metal Fab and Pipe Inc. have asked the Operator to approve these Programs for training and qualification purposes. 2) Outside experts may also be utilized for specialized equipment or process training
25. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))
Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 88967

Result Notes During 2020 in the standard inspection, Eric Larson produced his NACE Level II certification and I reviewed his OQ's for CP tasks. Please reference Form R in the attachments in that inspection for results.

26. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))

Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*

Assets Covered 88967

Result Notes This is in Task 38 (Tapping Steel and Plastic Pipe).

27. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.R, 192.627 (192.807(a), 192.807(b))

Question Text *Do records indicate the qualification of personnel performing hot taps?*

Assets Covered 88967

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

28. Question Result, ID, References Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-06-01, 192.801, 192.328)

Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*

Assets Covered 88967

Result Notes This is in Task 21.

29. Question Result, ID, References NA, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-06-01, 192.801, 192.328)

Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*

Assets Covered 88967

Result Notes No marking has occurred in several years. Records have been provided of qualifications in the event marking is needed. No such event occurred, or condition existed, in the scope of inspection review.

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

30. Question Result, ID, References NA, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*

Assets Covered 88967

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

31. Question Result, ID, References NA, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))

Question Text *Do records indicate adequate qualification of integrity management personnel?*

Assets Covered 88967

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

32. Question Result, ID, References NA, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))

Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*

Assets Covered 88967

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

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

33. Question Result, ID, References Sat, TQ.QUOMCONST.INSPECTOR.P, 192.241(a) (192.241(c), 192.805(b), 192.328(a), 192.328(b))

Question Text *Does the process require welding inspection personnel to be adequately trained and qualified?*

Assets Covered 88967

Result Notes Task 47 is for visual inspection of welds. Task 48 is is NDT qualifications

34. Question Result, ID, References NA, TQ.QUOMCONST.INSPECTOR.R, 192.241(a) (192.241(c), 192.807(a), 192.807(b))
Question Text *Do records indicate adequate qualification documentation for personnel who conduct welding inspections?*
Assets Covered 88967
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
35. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))
Question Text *Do records indicate the qualification of nondestructive testing personnel?*
Assets Covered 88967
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
36. Question Result, ID, References NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))
Question Text *Do records indicate that welders are adequately qualified?*
Assets Covered 88967
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
37. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 192.805(b))
Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*
Assets Covered 88967
Result Notes 10.4 Steel Pipe Qualifications
- a) Each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code (incorporated by reference, see §192.7).
- Task 46 has the 6 month retesting interval.
38. Question Result, ID, References Sat, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))
Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*
Assets Covered 88967
Result Notes Section 10.4
- c) A welder may qualify to perform welding on pipe to be operated at a pressure that produces a hoop stress of less than 20 percent of SMYS by performing an acceptable test weld.
39. Question Result, ID, References Sat, TQ.QUOMCONST.NDT.P, 192.243(b)(2) (192.803, 192.805(b), 192.805(h), 192.328(a), 192.328(b))
Question Text *Does the process require nondestructive testing of welds performed by personnel trained and qualified in processes and in use of the testing equipment?*
Assets Covered 88967
Result Notes Appendix A Task 48
40. Question Result, ID, References NA, TQ.QUOMCONST.PLASTIC.P, 192.285(a) (192.285(d), 192.805(b))
Question Text *Does the process require personnel making joints in plastic pipelines be qualified?*
Assets Covered 88967
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
41. Question Result, ID, References NA, TQ.QUOMCONST.PLASTICINSPECT.P, 192.287 (192.805(b))

Question Text *Does the process require that persons who inspect joints in plastic pipes be qualified?*

Assets Covered 88967

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

42. Question Result, ID, References NA, TQ.QUOMCONST.PLASTIC.R, 192.285(a) (192.285(d), 192.287, 192.807(a), 192.807(b))

Question Text *Do records indicate adequate qualification of personnel making/inspecting joints in plastic pipelines?*

Assets Covered 88967

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

TQ.TR: Training of Personnel

43. Question Result, ID, References Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))

Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*

Assets Covered 88967

Result Notes This is contained in the O&ME manual.

§ 192.605 – Procedural Manual for Operations, Maintenance, & Emergencies (a) – This procedural manual will be reviewed by the Solvay Chemicals E/M Department Manager or designee at least once each calendar year, at intervals not exceeding 15 months, to ensure that the manual is current. **Employees will receive training annually on all existing procedures and on any revisions made to the procedures. Records of annual reviews and employee training will be prepared and retained in file.**

§ 192.615 – Emergency Plans (a) The purpose of this emergency plan is to establish written procedures to minimize the hazards resulting from a pipeline emergency. A drawing of the system (Attachment F, drawing SK-393) is available for operation and maintenance personnel and they have been instructed to familiarize themselves with the location of the pipeline isolation valve that may be needed in an emergency. (b) A copy of the latest edition of the emergency plan is available to supervisors responsible for emergency action through the Solvay Document Store. **Training will be provided to operating personnel on the requirements of the emergency plan.**

44. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: DC.COMM)

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

Assets Covered 88967

Result Notes The emergency response plan uses Longview Fire Department for response in the public ROW. If there is an emergency, operations can shut down the flow. Emergency Response personnel are in plant.

45. Question Result, ID, References Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)

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

Assets Covered 88967

Result Notes **8.5 Incident Review**

a. In the event of an incident, both Solvay and Northwest Metal Fab & Pipe Inc. will review the qualifications of the individual or individuals involved.

- HSE-3000-1, Solvay Chemicals Emergency Action Plan requires a debriefing of a simulated or actual event.

Report Parameters: Results: all

Except as required to be disclosed by law, any 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.