Utilities and Transportation Commission Standard Inspection Report for Intrastate Hazardous Liquid Systems Procedures and Plan Review

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 **Standard Inspection Checklist, Cover Letter and Field Report** are submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report								
Inspection ID/Docke	et #	8080						
Inspector Name &		Derek Norwood/December 10, 2020						
Submit Date								
Chief Engineer Nam	e	Joe Subsits, 12/11/2020						
& Review Date								
		Operator Information						
Name of Operator:	Tid	ewater Terminal Company		OPID #:	31051			
Name of Unit(s):	Hea	dquarters						
Records Location:	Pas	co, WA						
Date(s) of Last Oc		ober 2016	Inspection Date(s):	5/5/2020-6/2	2/2020 and			
(unit) Inspection:				12/1-12/10/2	2020			

Inspection Summary:

This review is to assess compliance with all applicable provisions of 49 CFR 195 and WAC 480-75 that pertain to Tidewater Terminal Company's (Tidewater) Snake River Terminal (SRT) Inbound/Outbound Pipelines and SRT Pasco Rail Diesel Line.

This inspection consists of a review of Tidewater's Pipeline Operations and Maintenance Manual. In addition, the Manual references several other Tidewater documents including the Integrated Contingency Plan, OQ Plan, PA Plan, System Operation Manuals for Inbound/Outbound Pipeline and the Pasco Rail Diesel Line. As these manuals have specific operating procedures affecting hazardous liquid pipeline facilities, they were included in this review. The inspection was conducted remotely with follow-up questions directed to Tidewater personnel.

HQ Address:			System/Unit Name & Address:				
6305 Northwest Old Lowe	er River Road		671 Tank Farm Rd				
Vancouver, Washington 9	98660		Pasco, WA				
Co. Official:	Bill Collins		Phone No.:				
Phone No.:	360-759-0306		Fax No.:				
Fax No.:			Emergency Phone No.:				
Emergency Phone No.:							
Persons Intervi	ewed	Т	itle	Phone No.			
Ron McClar	у	Terminal Maintenance Manager		509-549-7701			
Josh Jarmar	n	Quality and Cor	npliance Manager	360-759-0338			

		WAC 480-75 REPORTING PROCEDURES	S	U	N/A	N/C
1.	480-75-610	Reporting of proposed pipeline construction 45 days prior to construction O&M Manual Section 602(d)	Х			
2.	480-75-620	Providing notice of hydrotest to change MOP O&M Manual Section 219	Х			
3.	480-75-630	 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. 	x			
4.	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. O&M Manual Section 810.3(a) 	X			
5.	480-75-630(3)	Notification within 24 hours of emergency situations including emergency shutdowns, material defects or physical damage that impairs serviceability? O&M Manual Section 810.3(b)	Х			
6.	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)				
7.	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) O&M Manual Section 208.3(c)	X			
8.	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 <u>without facility locates</u> first being completed? O&M Manual Section 208.3(d)	х			
9.	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. O&M Manual Section 208.3(e)	X			
10.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? O&M Manual Section 208.3(f)				
11.	480-75-630(5)(a)	• Notification requirements for excavators under RCW 19.122.050(1)	Х			
12.	480-75-630(5)(b)	• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and	X			
13.	480-75-630(5)(c)	• 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.	х			
14.	480-75-630(6)	 Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities 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 	X			

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presence of hazardous liquid pipeline facilities. 630(6)(b)		
O&M Manual Section 208.3(g)		

	SUBPART E - PRESSURE TESTING PROCEDURES	S	U	N/A	N/C
15.	A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory. .305(b) O&M Manual Section 585.2	х			
16.	Appropriate test medium .306 O&M Manual Section 585.5	Х			
17.	Pipe associated with tie-ins must be pressure tested308 O&M Manual Section 585.6	Х			
18.	Test records must be retained for useful life of the facility310(a) O&M Manual Section 585.7, 704	Х			
	Does the record required by paragraph (a) of this section include: .310(b)				
19.	Pressure recording charts310(b)(1) O&M Manual Section 585.7	Х			
20.	Test instrument calibration data310(b)(2) O&M Manual Section 585.7	Х			
21.	Name of the operator, person responsible, test company used, if any. .310(b)(3) O&M Manual Section 585.7	Х			
22.	Date and time of the test310(b)(4) O&M Manual Section 585.7	Х			
23.	Minimum test pressure310(b)(5) O&M Manual Section 585.7	Х			
24.	Test medium310(b)(6) O&M Manual Section 585.7	Х			
25.	Description of the facility tested and the test apparatus310(b)(7) O&M Manual Section 585.7	Х			
26.	Explanation of any pressure discontinuities, including test failures that appear on the pressure recording charts310(b)(8) O&M Manual Section 585.7	Х			
27.	Where elevation differences in the test section exceed 100 feet , a profile of the elevation over entire length of the test section must be included .310(b)(9) O&M Manual Section 585.7	Х			
28.	Temperature of the test medium or pipe during the test period. Amdt 195-78 pub. 9/11/03, eff. 10/14/03 .310(b)(10) O&M Manual Section 585.7	Х			
29.	Signature of certifying agent. WAC 480-75-420 (4)(b) O&M Manual Section 585.7	Х			
30.	Beginning and ending times of the test. WAC 480-75-420 (4)(c) O&M Manual Section 585.7	Х			
31.	Highest and lowest pressure achieved. WAC 480-75-420 (4)(e) O&M Manual Section 585.7	Х			
32.	Is report submitted to the commission 45 days prior to a hydro test, if test was used to raise the MOP (after 9/26/02)? WAC 480-75-620 O&M Manual Section 219	Х			

Comments:

	MAINTENA	NCE & NORMAL OPERATION PROCEDURES CONT:	S	U	N/A	N/C
33.	480-75-300	Providing leak detection under flow and no flow conditions and including a procedure for responding to alarm SRT Pasco Rail Diesel Line Section 4.12, SRT Inbound/Outbound section 4.2.2	Х			
34.	480-75-330	Responding to breakout tank overfill alarms SRT Inbound/Outbound section 4.2.4	Х			
35.	480-75-400	Backfilling pipe O&M Manual Section 504.2	Х			
36.	480-75-410	Using a holiday detector to check coating condition prior to backfilling O&M Section 403.11, Coating Inspection and Repair Procedure	Х			
37.	480-75-460	100% Inspection of welds. O&M Manual Section 521.1	Х			
38.	480-75-550	Reviewing change in class location for pipelines installed after 9/26/2003. All of Tidewater's pipelines have an MOP below class 4 requirements			Х	

MAPS and RECORDS PROCEDURES					U	N/ A	N/ C
39.		Making operation	g construction records, maps, and operating history available as necessary for safe on and maintenance402(c)(1) O&M Manual Section 702	X			
		Each og at least Manua	perator shall maintain current maps and records of its pipeline system that include the following information: .404(a) Updated within 6 months 480-75-600 O&M al Section 705(a)				
		Location Section	on and identification of the following facilities: .404(a)(1) O&M Manual a 705(a)				
40.	105 402(a) 8-	i.	Breakout tanks O&M Manual Section 705(a)	Х			
41.	WAC 480-75-600	ii.	Pump stations O&M Manual Section 705(a)	Х			
42.		iii.	Scraper and sphere facilities O&M Manual Section 705(a)	Х			
43.		iv.	Pipeline valves O&M Manual Section 705(a)	Х			
44.		v.	Facilities to which '195.402(c)(9) applies O&M Manual Section 705(a)	Х			
45.		vi.	Rights-of-way O&M Manual Section 705(a)	Х			
46.		vii.	Safety devices to which '195.428 applies O&M Manual Section 705(a)	Х			

	LINE MARKER PROCEDURES				N/A	N/C
47.	480-75-540	Markers checked annually and replaced within 30 days O&M Manual Section 211.1(d)	Х			

INSPECTION RIGHTS-of -WAY & CROSSINGS UNDER NAVIGABLE WATER PROCEDURES			S	U	N/A	N/C
48.	480-75-540	Depth of Cover - For pipelines constructed after 4/1/70, depth of cover surveys every five years or every three years for areas subject to erosion or subsoiling O&M Manual Section 602.3.1(c)	Х			
49.	195.402(a)	Operator must inspect the right-of-way weekly (unless weather impedes flyovers when applicable) WAC 480-75-530 O&M Manual Section 207.1	Х			
50.		Operator must inspect each crossing under a navigable waterway to determine the crossing condition at intervals not exceeding 5 years . .412(b)			X	

Item $50-Tidewater\ does\ not\ cross\ any\ navigable\ waterways$

		PIPELINE REPAIR PROCEDURES	S	U	N/A	N/C
51.	WAC 480-75-440	Repairs made in accordance with ASME B31.4 O&M Manual Section 520	Х			

		PIPE MOVEMENT PROCEDURES	S	U	N/A	N/C
52.	480-75-500	For evaluating pipe conditions during pipe movement including API 1117 stress calculations? O&M Manual Section 565	Х			

	DAMAGE PREVENTION PROGRAM PROCEDURES (Also in accordance with API 1162)					N/A	N/C
53.		.442(a)	Is there a written program in place to prevent damage by excavation activities applicable to the operator's pipelines? O&M Section 208	x			
54.		.442(b)	Does the operator participate in a qualified One-Call program? O&M Section 208.1	X			
55.		.442(c)(1)	Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located. O&M Section 208.1	X			
		.442(c)(2)	Provide for notification to the public in the vicinity of the pipeline and actual notification to the persons identified in paragraph (c)(1) of this section of the following, as often as needed to make them aware of the damage prevention program: PA Program				
56.			i. The program's existence and purpose.	Х			
57.			ii. How to learn the location of underground pipelines before excavation activities are begun.	X			
58.	.402(a)	.442(c)(3)	Provide a means of receiving and recording notification of planned excavation activities. O&M Section 208.1 and 208.2	X			
59.		.442(c)(4)	If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings. O&M Section 208.1	Х			
60.		.442(c)(5)	Provide for marking of buried pipelines in the area of excavation activity within 2 business days. WAC 480-75-270 RCW 19.122.030 O&M Section 208.2(a)	X			
			Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
61.		.442(c)(6)	 The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline. O&M Section 208.2(e) 	X			
62.			ii. In the case of blasting, any inspection must include leakage surveys. O&M Section 208.2(f)	X			
63.			Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? O&M Section 208.2	X			
			Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? O&M Section 208.3	X			
64.			Damage Prevention (Operator Internal Performance Measures PHMSA – State Program Evaluation Questions)			
65.			Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices, Best Practice 4-18. Recommended only, not required)			x	
66.			Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?			х	

	DAMAGE PREVENTION PROGRAM PROCEDURES (Also in accordance with API 1162)	S	U	N/A	N/C
67.	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?			х	
68.	Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? OQ Plan	х			
69.	Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. O&M Section 208	х			
70.	Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Checked during 2020 standard inspection	х			
71.	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements? Checked during 2020 standard inspection	х			

DAMAGE PREVENTION PROGAM PROCEDURES (State Requirements)			U	N/A	N/C
72.	Terminating the flow of hazardous liquid in pipeline immediately upon receiving information of <u>third party</u> <u>damage</u> . RCW 19.122.035 (2) O&M Manual Section 208.3	Х			
73.	Has the pipeline company visually inspected the damaged pipeline RCW 19.122.035 (2) O&M Manual Section 208.3	Х			
74.	Has the pipeline company determined if the damaged pipeline should be repaired or replaced RCW 19.122.035 (2) O&M Manual Section 208.3	Х			
75.	Notification to local first responders and Dept of Ecology of any reportable release? Integrated Contingency Plan	x			

Items 65-67 – Tidewater performs all locates in-house.

Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002		S	U	N/A	N/C	
	49 U.S.C. 60132, Subsection (b) ADB-08-07	Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to https://www.npms.phmsa.dot.gov/DataReview/login.jsp <u>to review existing data on</u> <u>record. Also report no modifications if none have occurred since the last complete</u> <u>submission.</u> Include operator contact information with all updates. O&M Manual Section 822	X			
	RCW 81.88.080	Pipeline Mapping System: Operator provides 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			

SUBPART H – CORROSION CONTROL PROCEDURES 195.402(a)		S	U	N/A	N/C
76.	For placement of test stations at casing? WAC 480-75-340 O&M Manual Section 402.3	X			
77.	Examination of pipe prior to backfilling. WAC 480-75-520 O&M Section 404 and 602.3(c)	X			
78.	Remediation of corrosion system deficiencies initiated within 90 days of discovery WAC 480-75-510 O&M Manual Section 403.1(d)	X			

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