Inspection Output (IOR)

Generated on 2021.March.30 12:41

Inspection Information

Inspection Name	8268 Inland Empire Standard Inspection	Operator(s)	INLAND EMPIRE PAPER CO (8140)	Plan Submitted	03/16/2021
Status	PLANNED	Lead	Derek Norwood	Plan Approval	03/16/2021 by Joe Subsits
Start Year	2021	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Scott Anderson, Darren Tinnerstet	All Activity Start	03/22/2021
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	03/23/2021
Protocol Set ID	GT.2021.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

The inspection was a standard inspection and included a review of all operations and maintenance records since the last standard inspection. Records were reviewed for 2018, 2019 and 2020 and included cathodic protection, leak surveys, reporting, regulator inspections, valve inspection, patrolling, odorization, etc. During the field portion of the visit, we checked CP, odorization, markers reliefs and valves.

Facilities visited and Total AFOD

Records were reviewed at Inland Empire's office in Millwood, WA. Facilities inspected began at a Williams meter station and traveled 3.5 miles to the mill.

Total AFOD: 2 days

Summary of Significant Findings

During the course of the inspection, two probable violations were noted. The first is in regard to qualification of managers who perform covered functions and the second probable violation is in regard to re-qualification of field personnel.

Primary Operator contacts and/or participants

Doug Krapas
Environmental Manager

Kevin Davis
Production Manager

Operator executive contact and mailing address for any official correspondence

Kevin Rasler
President
3320 N Argonne Rd
Millwod, WA 99212

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86256 (92)	Inland Empire	unit	86256	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP Plastic Pipe CDA Abandoned	72	72	72	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.	86256 (92)	Baseline Records (Form 1), Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 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	Total Inspected	Required % Complete
1.	Records	--	03/22/2021 03/23/2021	Baseline Records (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	all assets	all types	57	57	57	100.0%
2.	Field	--	03/22/2021 03/23/2021	Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	all assets	all types	15	15	15	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 (Unsat,Concern values, 2 results)

TQ.OQ: Operator Qualification

1. Question Result, ID, References: Unsat, 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: 86256 (92)

Result Issue Summary: Inland Empire's process does not specify the evaluation and qualification requirements for supervisors and managers who perform covered tasks. The process must include qualification procedures for all

	personnel who perform covered tasks. The qualification process must show that an individual can perform the task and react to abnormal operating conditions.
Standard Issues	B2 (Moderate or small impact/limited occurrence) : 192.805(b) : Inadequate evaluation methods established and documented covered tasks.
Result Notes	Inland Empire's process does not specify the evaluation and qualification requirements for supervisors and managers who perform covered tasks. The process must include qualification procedures for all personnel who perform covered tasks. The qualification process must show that an individual can perform the task and react to abnormal operating conditions.
2. Question Result, ID, References	Unsat, TQ.OQ.RECORDS.R, 192.807
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	86256 (92)
Result Issue Summary	Inland Empire has specified a 3-year re-qualification interval for Inland Empire employees performing covered tasks. One individual was due for re-qualification in 2020 and at the time of the commission inspection, the employee had not been re-qualified.
Standard Issues	B2 (Moderate or small impact/limited occurrence) : 192.805(g) : Records indicate requirement not completed at required intervals.
Result Notes	Inland Empire has specified a 3-year re-qualification interval for Inland Empire employees performing covered tasks. One individual was due for re-qualification in 2020 and at the time of the commission inspection, the employee had not been re-qualified.

Report Parameters: Results: Unsat,Concern

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