

STATE OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

November 30, 2021

Andrew Troske Vice President McChord Pipeline Company 3001 Marshall Ave Tacoma, WA 98421

RE: 2021 Hazardous Liquid Standard Records and Field Inspection, Public Awareness Program Review, and Annual Review – McChord Pipeline Company – (Insp. No. 8275, 8276, 8277)

Dear Mr. Troske:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Records and Field Inspection, a Public Awareness Program Review, and an Annual Review of McChord Pipeline Company from November 2, 2021, to November 4, 2021. The inspection included a review of procedures, records, and a check of field assets.

No apparent violations were noted as a result of the inspection. This inspection will be closed as of the date of this letter.

Staff thanks McChord Pipeline Company's personnel for their professionalism and cooperation during this inspection.

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 489-8684.

Sincerely,

Sean C. Mayo Pipeline Safety Director

cc: Joseph Israel, President, McChord Pipeline Company Joel Roppo, Chief Engineer, McChord Pipeline Company

G2 - HL Records & Field 8275

UTC Standard Inspection Report Intrastate Hazardous Liquid FORM G2: State-Specific Requirements

Inspector and Operator Information

Inspection Link	Inspector - Lead	Inspector - Assist
8275	Cullom, David	
Operator	Unit	Records Location - City & State
McChord Pipeline Company		
Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date
11-02-2021	11-04-2021	

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

Inspection Summary - AFODs

This inspection consisted of procedures, records, and field review. There were (2) MS Teams inspection days and (1) day in the field.

Findings

There were no probable violations or areas of concern.

System Summary

The line is 14.25 miles of 6.625" pipe that serves JBLM from the US Oil Refinery. The line is 13.25 miles of original pipe and 1 mile of seamless pipe that was replaced during a reroute. This is indicated on the annual report filed by the operator. Surge analysis performed by Veco Engineering on Aug 20, 1999. MOP is 720 the NOP is 450. An assessment of the Pre-70 ERM long seam threat was also completed.

During the field portion of the inspection, 330 psig was recorded as the line was blocked in between the pump and P-1401-B. 255 psig was recorded for the line pressure in a non flowing state. The high pressure limit is set at 480 psig and the low pressure limit is set at 175 psig. The pig launcher thermal relief, RV-1407, is set at 720 psig.

Company Contacts

First Name Last Name Phone Email Organization Position
Joel Roppo (253) 383-1651 jroppo@parpacific.com Par Pacific Chief Engineer

John Williamson (253) 383-1651 jwilliamson@parpacific.com Par Pacific Senior Inspector

Instructions and Ratings Definitions

INSTRUCTIONS	INSPECTION RESULTS	
S - Satisfactory		
U - Unsatisfactory	Unsatisfactory Responses	Unsatisfactory List
	0	
Area Of Concern	Area of Concern Responses	Area of Concern List
	0	
N/A- Not Applicable (does not apply in this inspection)	Not Applicable Responses	Not Applicable List
	18	5,6,7,9,10,11,12,13,14,18,22,25,26,27,30,32,33,37
N/C - Not Checked/Evaluated (was not inspected during this	Not Checked / Evaluated	Not Checked / Evaluated List
inspection)	Responses	
	0	

^{**}If an item is marked Unsat, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the "RECORDS: REQUIRED COMMENTS" section.



MAPPING RECORDS

Question 1

Has the operator provided accurate maps (or updates) of pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

Q1 Reference Q1 Result Q1 Notes

RCW 81.88.080 Satisfactory The mapping information has been provided to the UTC.

Question 2

THIS QUESTION EXISTS IN IA AS RPT.RR.NPMSANNUAL.R Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes gathering lines) occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

Q2 Reference Q2 Notes

WAC 480-75-600 This was verified and was complete.

Question 3

Do records indicate that the operator prepares, maintains, and provides to the commission upon request copies of maps, drawings, and records that pertain to their system? Are these documents in sufficient scale and detail to show size and type of material of all facilities?

Q3 Reference Q3 Notes

WAC 480-75-600 The maps and records were sufficient.

REPORTING RECORDS

Question 4

Are telephonic reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 made within two hours for events which result 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.

Q4 Reference Q4 Result Q4 Notes

WAC 480-75-630(1) Satisfactory No reportable incidents since 2017.

Question 5

THIS QUESTION EXISTS IN IA AS RPT.RR.CONSTRUCTIONREPORT.R Has the operator reported all construction of new pipelines intended to operate at 20% SMYS or greater) at least 45 days prior to construction? This report must include the items specified in 480-75-610 (1) (a-h) For new construction operating below 20% SMYS, does the company submit written notice of proposed construction that includes project description and timeline? (NOTE: items a-h not required if operating under 20% SMYS

Q5 Reference Q5 Result Q5 Notes

WAC 480-75-610 Not Applicable This event or condition has not occurred during this inspection time period.

Question 6

Are written reports to the commission submitted within 30 calendar days of a reportable incident? Do the reports 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.

Q6 Reference Q6 Result Q6 Notes

WAC 480-75-630(2) Not Applicable This event or condition has not occurred during this inspection time period.

Question 7

Do records indicate that telephonic reports are made to UTC Pipeline Safety Incident Notification line made within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline?

Q7 Reference Q7 Result Q7 Notes

WAC 480-75-630(3) Not Applicable This event or condition has not occurred during this inspection time period.

Question 8

Does the operator file with the commission, not later than June 15 of each year, applicable to the preceding calendar year: A copy of PHMSA F-7000.1-1 Annual report; A report titled "Hazardous Liquid Annual Report Form", which can be obtained from the Pipeline Safety Section of the commission. This annual report must include in detail interstate and intrastate pipeline mileage in WA and a list of reportable and nonreportable safety related conditions as defined by 49 CFR 195.55

Q8 Reference Q8 Result Q8 Notes

WAC 480-75-650 Satisfactory This has been submitted

DAMAGE PREVENTION RECORDS

Question 9

THIS QUESTION EXISTS IN IA AS RPT.RR.DIRTREPORTS.R In the event of excavation damage, does the operator: report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)? 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? Does the operator retain all damage and damage claim records it creates related to damage events, including photographs and documentation supporting the conclusion that a facilities locate was not completed, reported under subsection (b) of this section for a period of two years and make those records available to the commission upon request?

Q9 Reference Q9 Result Q9 Notes

WAC 480-75-630(4) Not No reportable incidents since 2017

Applicable

Question 10

THIS QUESTION EXISTS IN IA AS PD.DP.NOTICETOEXCAVATOR.R Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? Notification requirements for excavators under RCW 19.122.050(1) A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 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.

Q10 Reference - 1 Q10 Reference - 2 RCW 19.122 WAC 480-75-630(5)

Q10 Result Q10 Notes

Not Applicable No reportable incidents since 2017

Question 11

THIS QUESTION EXISTS IN IA AS PD.DP.COMMISSIONREPORT.R Does the operator report to the commission only when the operator or its contractor observes or becomes aware of any 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; A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities.

Q11 Reference-1 Q11 Reference - 2 RCW 19.122 WAC 480-75-630(6)

Q11 Result Q11 Notes

Not Applicable No reportable incidents since 2017

Question 12

Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do records indicate that the operator conducts regular field audits of the performance of locators/contractors and take action when necessary?

Q12 Reference Q12 Result Q12 Notes

PHMSA State Program Not Locates are performed in-house.

Question

Applicable

Question 13

Do records indicate operator includes performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

Q13 Reference Q13 Result Q13 Notes

WAC 480-75-200 Not Locates are performed in-house.

Applicable

Question 14

Do locate entities address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

Q14 Reference Q14 Result Q14 Notes

WAC 480-75-200 Not Locates are performed in-house.

Applicable

Question 15

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?

Q15 Reference Q15 Result Q15 Notes

WAC 480-75-200 Satisfactory There have been no changes to methods used to perform locates, but MPL locating have attended Staking University.

Question 16

Are locates are being made within the timeframes required by RCW 19.122? Examine record sample.

Q16 Reference Q16 Result Q16 Notes

RCW 19.122.035 Satisfactory We reviewed locates for October and they are well documented with photos. There were no time exceedances noted

Question 17

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

Q17 Reference Q17 Result Q17 Notes

WAC 480-75-200 Satisfactory OQ records for John Williamson and Steve Calton were reviewed. The expiration dates for locating for Steve were

7/1/22 and John were 5/20/2022.

OPERATIONS & MAINTENANCE RECORDS

Question 18

THIS QUESTION EXISTS IN IA AS DC.PT.PRESSTESTRPT.R Has there been a change in MOP for the system? Was a hydrotest conducted as part of an effort to increase MOP? If so, did the operator file a report with the commission at least 45 days prior to pressure testing? If a report was submitted, did it include the change in MOP and sufficient information justifying a higher operating pressure?

Q18 Reference Q18 Result Q18 Notes

WAC 480-75- Not No MOP changes. This event or condition has not occurred during this inspection time period.

Applicable

Question 19

THIS QUESTION EXISTS IN IA AS MO.RW.DEPTHSURVEY.R (For lines constructed after 4/1/1970) does the operator conduct depth of cover surveys within its ROW every 5 years at a minimum to ensure minimum depth of cover as required by subsections (1) and (2)? In areas subject to erosion and subsoiling, this

survey is required every 3 years. SEE CHART in 480-75-640(1) or 195.248 for appropriate depths, and 480-75-640(2) for exceptions.

Q19 Reference Q19 Result Q19 Notes

The last ROW Depth of cover survey was done 10/25/2019. The river survey was done 8-24-2021. WAC 480-75-Satisfactory

640

Question 20

Do leak detection records indicate that the operator provides leak detection for their system under both flow and no-flow conditions? Is the leak detection system capable of detecting n 8% maximum flow leak within 15 minutes or less? Has the company followed its procedure for leak detection and for responding to leak detection alarms? Does the company maintain leak detection maintenance and alarm records?

Q20 Q20 Result Q20 Notes

Reference Satisfactory They maintain the PVs in PM1631. The alarm records are under control room management.

WAC 480-75-

300

Question 21

THIS QUESTION EXISTS IN IA AS MO.LMOPP.SURGEANALYSIS.R Has the operator conducted surge analyses to ensure that the surge pressure does not exceed 110% of the MOP? Is the operator's pressure relief system designed and operated consistent with that surge analysis at or below MOP except under surge conditions? This also applies to rapid shutdown valves (see Question 20/WAC 480-75-390)

Q21 Reference Q21 Result Q21 Notes

WAC 480-75-Satisfactory I reviewed the surge analysis done by Veco Engineering August 20, 1999 in previous inspection and the opertor produced a 320

copy during this inspection.

Question 22

Does the system contain Breakout Tanks (BOT)? If so, do records indicate that the BOTs have an independent level alarm?

Q22 Result Q22 Notes Reference No BOTs Not

Applicable WAC 480-75-

330

Question 23

Does the operator rapidly locate and isolate reportable releases from its pipeline? When determining valve type, its location, and shut-off time, does the operator consider the following: Terrain, geohazards, drainage, pipe type and condition. Whenever the operator installs a new rapid shutdown valve, does the operator conduct surge analysis to ensure that surge pressure will not exceed 110% MOP as a result of rapid valve closure?

Q23 Notes Q23 Q23 Result

Reference Satisfactory They have not installed any new rapid shutdown valves. The 2017 incident demonstrated the shutdown and isolation response

WAC 480-75-

Question 24

THIS QUESTION EXISTS IN IA AS TD.COAT.NEWPIPEINSPECT.R Does the operator electrically inspect all new coated pipe using a holiday detector to check for faults not observable by visual examination? Is the holiday detector operated at the appropriate voltage level for the electrical characteristics of the pipe being tested?

Q24 Q24 Result Q24 Notes

Reference The procedure is in E-8 (9. Testing) MPL has the calibration for the holiday detector that Michaels used for the 2019 ILI Satisfactory

dig/coating repair.

WAC 480-75-

410

Question 25

Has the operator conducted a hydrostatic test of any new or existing line since the last UTC standard comprehensive inspection? When hydrotesting, does the operator adhere to the following requirements: If a manifold is used, is the valve positioned between the pressure testing manifold and the pipeline being tested? Are the isolation valves rated for the manifold test pressure when in the closed position? Did the operator separately pressure test the manifold used in the hydrotest to at least 1.2 times the pipeline test pressure, but not less than the discharge pressure of the pump used for pressure testing? If a pressure relief valve is used, is each such valve must he of adequate capacity and set to relieve at 10% above the hydrotest pressure? Did the operator calibrate the relief valve within 1 month prior to the hydrotest ?If a bleed valve is used to protect from overpressure, is the valve readily accessible during testing in case immediate depressurization is required? Did the operator maintain documents signed by a person with sufficient knowledge, certifying the accuracy of test information? Did the test documentation contain the following: Date of test, beginning and ending time of test, beginning and ending temperatures, highest and lowest pressures achieved, and a test chart or other record that shows the pressure maintained at the minimum test pressure throughout the entire test? Did the operator notify local government and fire department with jurisdiction in the area affected by the hydrotest? Did the operator post precautions/warning signs indicating that a hazardous liquid pipeline was under test? Did the operator ensure that no water was added to the pipeline after the hydrotest started? Did the operator comply with applicable rules of WA Department of Ecology addressing disposal of test water?

Q25 Q25 Result Q25 Notes

Reference No hydrostatic tests since the last standard comprehensive inspection. Not

Applicable WAC 480-75-

Question 26

Did the operator make any new girth welds on new or repaired section of pipe since the last UTC standard comprehensive inspection? For new girth welds on new or repaired section of pipe: Were all girth welds inspected by radiography or automatic ultrasonic testing in accordance with API 1104? Did the operator keep a log of each weld inspected and keep all inspection records for the life of the pipeline?

Q26 Q26 Result Q26 Notes

Reference Not None since the last standard inspection.

Applicable WAC 480-75-

460

Question 27

THIS QUESTION EXISTS IN IA AS DC.MO.MOVE.R Did the operator move or lower any line pipe since the last UTC standard comprehensive inspection? If any pipe was moved/lowered, did the operator prepare a study to determine whether movement would cause an unsafe condition? Was the study reviewed and approved by a person designated by the operator as qualified to review the study? Did the study include pipe stress calculations based on API RP 1117 "Movement of In-Service Pipelines"?

Q27 Q27 Result Q27 Notes

Applicable

Reference Not The pipeline has not been moved or lowered since last inspection.

WAC 480-75-

500

Question 28

THIS QUESTION EXISTS IN IA AS MO.LOMOP.MOPDETERMINE.R Does the operator reevaluate MOP when class locations change? Did the operator reevaluate class locations once every five years at a minimum?

Q28 Q28 Result Q28 Notes

Reference Satisfactory There have been no class location changes.

WAC 480-75-

550

CORROSION CONTROL RECORDS

Question 29

Does each cathodically protected pipeline have test stations and other electrical measurement contact points located at pipe casings and at other locations sufficient to facilitate cathodic protection testing?

Q29 Reference Q29 Result Q29 Notes

WAC 480-75-340 Satisfactory Locations were field verified and tested.

Question 30

Did the operator identify any corrosion deficiencies since the last UTC standard comprehensive inspection? Did the operator initiate remedial action as necessary to correct any deficiency observed during corrosion monitoring within 90 days after the operator detected the deficiency?

Q30 Reference Q30 Result Q30 Notes

WAC 480-75-510 Not Applicable No low CP readings for 2019-2021.

Question 31

Did the company examine all pipe exposed for any reason for evidence of mechanical damage or external corrosion, to include inspection of coating? Did the operator evaluate all mechanical damage and repair as necessary in accordance with procedures? Did the operator repair all coating damage prior to reburial of pipe? If the operator finds active corrosion, general corrosion, or corrosion that has caused a leak, did the operator investigate further to determine the extent of corrosion? Did the operator maintain a report of these inspections for the life of the pipeline?

Q31 Reference Q31 Result Q31 Notes

WAC 480-75-520 Satisfactory The only pipe exposed since the last standard inspection were the ILI digs in 2019.

DESIGN/CONSTRUCTION RECORDS

Question 32

THIS QUESTION EXISTS IN IA AS DC.CO.ASMECONSTRUCTION.R Are new pipelines designed and constructed in accordance with ASME B31.4 "Pipeline Transportation Systems for Liquid Hydrocarbon and Other Liquids"? Are longitudinal seams of connecting pipe joints offset by at least 2 inches? Are longitudinal seams located on the upper half of the pipe when laid in an open trench?

Q32 Reference Q32 Result Q32 Notes

WAC 480-75-350 Not Applicable No new pipeline construction.

Question 33

THIS QUESTION EXISTS IN IA AS DC.COCMP.PMPPROPERTY.R For newly constructed pump stations: Constructed with prior approval of the appropriate zoning authority and having acquired all the necessary permits? In areas not zoned, the pump station shall not be located closer than 500 feet from an existing building intended for human occupancy (other than a building under control of the pipeline company). When locating new pump stations and breakout tanks, does the company consider such hazards as overhead powerlines, geologic faults, areas prone to flooding, landslides, and falling rocks?

Q33 Reference Q33 Result Q33 Notes

WAC 480-75-380 Not Applicable No new pump station construction.

RECORDS: REQUIRED COMMENTS

RECORDS REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

FIELD INSPECTION OBSERVATIONS

Question 34

Are proper pipeline markers emplaced wherever line pipe and associated facilities are exposed? Do all lines attached to bridges or otherwise spanning an area have markers visible and readable at both ends of the suspended pipeline? Are markers inspected annually and replaced within 30 days if found to be missing or damaged?

Q34 Reference Q34 Result Q34 Notes

WAC 480-75-540 Satisfactory Markers are suitable.

Question 35

Are pressure relief devices set at or below MOP?

Q35 Reference Q35 Result Q35 Notes

WAC 480-75-320 Satisfactory These were verified and are in the main IA inspection notes for inspection 8275.

Question 36

Does leak detection system detect 8% max flow leakage within 15 minutes? Does the sytem detect leakage in both flow and no-flow conditions?

Q36 Reference Q36 Result Q36 Notes

WAC 480-75-300 Satisfactory This has been verified and demonstrated in operation when the line was damaged in 2017.

Question 37

Do Breakout Tanks have independent overfill alarms?

Q37 ReferenceQ37 ResultQ37 NotesWAC 480-75-330Not ApplicableNo BOTs

Comments - Field Observations - Any rating other than Satisfactory, requires comments. Ensure you annotate the question number for each comment.

Inspection Output (IOR)

Generated on 2021. November 24 09:48

Inspection Information

Inspection Name 8275 McChord Standard

Comprehensive

Status PLANNED
Start Year 2021
System Type HL
Protocol Set ID HL.2020.03

Operator(s) MCCHORD PIPELINE CO. (31049)

Lead David Cullom

Observer(s) Scott Rukke, Dennis Ritter, Lex Vinsel,

Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi

Supervisor Joe Subsits
Director Sean Mayo

Plan Submitted 09/16/2021

Plan Approval 09/20/2021 by Sean

Mayo

All Activity Start 11/02/2021
All Activity End 11/05/2021

Inspection Submitted -Inspection Approval --

Inspection Summary

Inspection Summary - AFODs

This inspection consisted of procedures, records, and field review. There were (2) MS Teams inspection days and (1) day in the field.

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There were no probable violations or areas of concern.

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The line is 14.25 miles of 6.625" pipe that serves JBLM from the US Oil Refinery. The line is 13.25 miles of original pipe and 1 mile of seamless pipe that was replaced during a reroute. This is indicated on the annual report filed by the operator. Surge analysis performed by Veco Engineering on Aug 20, 1999. MOP is 720 the NOP is 450. An assessment of the Pre-70 ERM long seam threat was also completed.

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Company Contacts

First Name Last Name Phone Email Organization Position

Joel Roppo (253) 383-1651 jroppo@parpacific.com Par Pacific Chief Engineer

John Williamson (253) 383-1651 jwilliamson@parpacific.com Par Pacific Senior Inspector

Scope (Assets)

# Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1. 8275	8275	unit	88980	Pump Stations Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress Abandoned	157	157	157	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. 8275	Field Observations Review, BO Tank Inspection, Baseline Records (Form 3), Baseline Pipeline Field Inspection (Form 3)	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail

Plan Implementations

7	Activity Name	Start Date End Date	Focus Directives	Involved Groups/Subgroup s	Asset s	Qst Type(s)	Planne d	Require d	Total Inspecte d	Required % Complet e
1	Standard Com p	 11/02/202 1 11/05/202 1	Observation	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	8275	all types	157	157	157	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	Standard Comprehensive Inspection	COMPLETED	11/05/2021	Standard Comp	8275

Results (all values, 158 results)

184 (instead of 158) results are listed due to re-presentation of questions in more than one sub-group.

CR.CRMRR: Roles and Responsibilities

1. Question Result, ID, Sat, CR.CRMRR.PRESSLIMITS.O, 195.446(b)(2)

Question Text Are controllers aware of the current MOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MOP?

Assets Covered 8275

Result Notes I interviewed a controller, Eddie Gutierrez, during the field portion and he was aware of the MOP.

CR.LD: Leak Detection (Non-CPM)

2. Question Result, ID, Sat, CR.LD.EVAL.R, 195.444(a) (195.444(b), 195.134(a), 195.134(b),) References

Question Text Do records show that the operator evaluated the capability of its leak detection system to protect the public, property, and the environment and modified as necessary?

Assets Covered 8275

Result Notes There are meter calibrations for PMs. Flow meters are calibrated every 6 months. They have a portable prover that is used for calibration. The pressure switches are checked every 6 months. I reviewed several years of data.

3. Question Result, ID, Sat, CR.LD.LDSYSTEM.R, 195.404(c) (195.134(b), 195.444(b)) References

Question Text Do records demonstrate the operator's leak detection system is performing within the system design requirements?

Assets Covered 8275

Result Notes MPL uses a leak detection system that can detect 8% within 15 minutes. The equipment used to track essential variables to run the CPM.

4. Question Result, ID, Sat, CR.LD.LDTRAINING.R, 195.507(a) (195.507(b)) References

Question Text Do records show that pipeline controllers are trained to recognize leaks using the chosen leak detection method/system?

Assets Covered 8275

Result Notes Task/ Qual 40 (Operation of Pipeline System) was reviewed Paul Daza 9/9/21. AOC The same quals were reviewed for Mike Pilkenton 10-19-21 for Task 40 (40.1-40.3) This is done every three years.

5. Question Result, ID, References Sat, CR.LD.LDTRAINING.O, 195.505

Question Text Are the Pipeline Controllers trained to recognize leaks?

Assets Covered 8275

Result Notes I interviewed a controller, Eddie Gutierrez, during the field portion and he explained how the leak detection alarms operate and what parameters to monitor.

6. Question Result, ID, Sat, CR.LD.ALARMDISPLAY.O, 195.444(b) References

Question Text Are the Leak Detection alarms adequate?

Assets Covered 8275

7. Question Result, ID, Sat, CR.LD.LDSTEST.R, 195.134(b) (195.444(b))
References

Question Text Have leak detection system testing records and results been retained/available and indicate adequate results?

Assets Covered 8275

Result Notes Please see the calibration PMs reviewed in the previous question.

8. Question Result, ID, References Sat, CR.LD.LDSINSTRUMENT.R, 195.444(b) (195.446(j))

Question Text Do records indicate the calibration of field instrumentation used in the leak detection system was performed?

Assets Covered 8275

Result Notes Please see the calibration PMs reviewed in the previous question.

DC.CO: Construction

9. Question Result, ID, Sat, DC.CO.VALVEPROTECT.O, 195.258(a)

Question Text Are valves accessible to authorized employees and protected from damage or tampering?

Assets Covered 8275

Result Notes Valves are properly secured.

10. Question Result, ID, Sat, DC.CO.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), References 195.260(f))

Question Text Are valves located as specified by 195.260?

Assets Covered 8275

11. Question Result, ID, Sat, DC.CO.RECORDS.R, 195.266(a) (195.266(b), 195.266(c), 195.266(d), 195.266(e), 195.266(f))

Question Text Do records indicate that construction records are being maintained for the life of each pipeline?

Assets Covered 8275

Result Notes Records from 2019 verification digs were reviewed after the 2019 ILI run. They had 41% metal loss on one called. They did 3 digs and used a total of 5 clock springs. The sites were 99th and McKinley (2CS), 99th and Aquaduct (2 digs with 3 CS) There was another dig at Waller, but it was for a test station.

DC.WELDINSP: Construction Weld Inspection

12. Question Result, ID, References Sat, DC.WELDINSP.GIRTHWELDNDT.R, 195.234(d) (195.266(a)) (also presented in: TDC.WELDINSP)

Question Text Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?

Assets Covered 8275

Result Notes They X-rayed 100% of girth welds in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and were reviewed.

13. Question Result, ID, Sat, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a)) (also presented in: References TDC.WELDINSP)

Question Text Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?

Assets Covered 8275

Result Notes They X-rayed 100% in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and I reviewed.

14. Question Result, ID, Sat, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a)) (also presented in: References TDC.WELDINSP)

Question Text Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?

Assets Covered 8275

Result Notes They X-rayed 100% in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and I reviewed.

15. Question Result, ID, Sat, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a)) (also presented in: References TDC.WELDINSP)

Question Text Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tieins?

Assets Covered 8275

Result Notes They X-rayed 100% in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and I reviewed.

DC.WELDERQUAL: Construction Welder Qualification

16. Question Result, ID, Sat, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME References Boiler & Pressure Vessel Code Section IX) (also presented in: TDC.WELDERQUAL)

Question Text Do records indicate that welders are qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?

Assets Covered 8275

Result Notes Dae Kim weld quals for 2017 were reviewed 5/31/2017. There has not been any welding projects during this inspection time.

DC.WELDPROCEDURE: Construction Welding Procedures

17. Question Result, ID, Sat, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b) (also presented in: TDC.WELDPROCEDURE) References

Question Text Do records indicate welding procedures and qualifying tests recorded in detail?

Assets Covered 8275

DC.MO: Maintenance and Operations

18. Question Result, ID, Sat, DC.MO.SAFETY.P, 195.402(a) (195.422(a), 195.402(c)(14)) References

Question Text Does the process ensure that pipeline maintenance construction and testing activities are made in a safe manner and are made so as to prevent damage to persons and property?

Assets Covered 8275

Result Notes Administrative Manual Section B-1 Section 1.2 etc.

DC.PT: Pressure Testing

19. Question Result, ID, Sat, DC.PT.PRESSTEST.R, 195.310 (195.305(b))

Question Text Are pressure test records available and adequate?

Assets Covered 8275

Result Notes The 509 reroute in 2000 has pressure testing charts.

20. Question Result, ID, NA, DC.PT.PRESSTEST.O, 195.302(a) (195.304, 195.305(a), 195.305(b), 195.306(a), 195.306(b), References 195.306(c), 195.306(d), 195.307(a), 195.307(b), 195.307(c), 195.307(d), 195.307(e), 195.308(d)

Question Text Is pressure testing being adequately conducted?

Assets Covered 8275

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

21. Question Result, ID, Sat, DC.PT.PRESSTESTTIEIN.R, 195.308 References

Question Text Do records indicate pipe associated with tie-ins has been pressure tested?

Assets Covered 8275

Result Notes The 2017 pretested pipe for 100th and A St was in tested in 2009. Records reviewed.

DC.TQOQ: Training and Qualification (OQ)

22. Question Result, ID, Sat, DC.TQOQ.RECORDS.R, 195.505(b) (Operators OQ program manual)

Question Text Does the operator maintain qualification records for operator personnel?

Assets Covered 8275

Result Notes John Williamson's locating OQ is good until 5/22 (Task 13)

John Williamson's ROW patrol OQ is 6/23 (Task 12)

TDC.TK650REGS: New Breakout Tanks (API 650) - Regulatory Requirements

23. Question Result, ID, NA, TDC.TK650REGS.BOSPEC.P, 195.132(b)(3) (API Std 650) References

Question Text Does the process for new aboveground atmospheric breakout tanks require tank design and construction to meet the requirements of 195.132(b)(3)?

Assets Covered 8275

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

24. Question Result, ID, NA, TDC.TK650REGS.BOSPEC.R, 195.132(b)(3) (API Std 650)

Question Text Do the design records and drawings indicate new aboveground atmospheric breakout tanks are designed and constructed to the specifications required by 195.132(b)(3)?

Assets Covered 8275

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

8275 McChord Standard Comprehensive

25. Question Result, ID, NA, TDC.TK650REGS.REPAIRSPEC.P, 195.205(b)(1) (API Std 650, API Std 653)

Question Text Are breakout tanks required to be repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?

Assets Covered 8275

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

26. Question Result, ID, NA, TDC.TK650REGS.REPAIRSPEC.R, 195.205(b)(1) (API Std 650, API Std 653)

Question Text Do records indicate breakout tanks were repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?

Assets Covered 8275

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

27. Question Result, ID, NA, TDC.TK650REGS.LEAKTESTING.P, 195.307(c) (195.310(a), API 650, 195.310(b))

Question Text Does the process for new aboveground breakout tanks require leak testing of tanks in accordance with 195.307?

Assets Covered 8275

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

28. Question Result, ID, NA, TDC.TK650REGS.REPAIRLEAKTEST.P, 195.307(d) (195.310(a), 195.310(b), API 653) References

Question Text Does the process for aboveground atmospheric breakout tanks require leak testing of tanks after repairs, alterations, and reconstruction in accordance with 195.307(d)?

Assets Covered 8275

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

29. Question Result, ID, Paferances NA, TDC.TK650REGS.BOCP.P, 195.565 (195.563(d), API Std 651)

Question Text Does the process for new aboveground breakout tanks specify cathodic protection as required by 195.565?

Assets Covered 8275

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

30. Question Result, ID, NA, TDC.TK650REGS.BOCP.O, 195.565 (195.563(d), API Std 651)

Question Text Do field observations confirm new breakout tanks have cathodic protection installed in accordance with 195.565?

Assets Covered 8275

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

31. Question Result, ID, NA, TDC.TK650REGS.BOIMPOUND.P, 195.264(a) (195.264(b), 195.264(c), 195.264(d), 195.264(e)) References

Question Text Does the process for new aboveground breakout tanks require impoundment(s) to meet the requirements of 195.264 in the event of tank spillage or failure?

Assets Covered 8275

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

TDC.WELDPROCEDURE: New Tank Piping - Construction Welding Procedures (Re-Presented)

32. Question Result, ID, Sat, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b) (also presented in: DC.WELDPROCEDURE) References

Question Text Do records indicate welding procedures and qualifying tests recorded in detail?

Assets Covered 8275

Result Notes Dae Kim weld quals (destructive tests and PQR) for 2017 were reviewed 5/31/2017. There has not been any welding projects during this inspection time.

TDC.WELDERQUAL: New Tank Piping - Construction Welder Qualification (Re-Presented)

- 33. Question Result, ID, Sat, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME References Boiler & Pressure Vessel Code Section IX) (also presented in: DC.WELDERQUAL)
 - Question Text Do records indicate that welders are qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?

Assets Covered 8275

Result Notes Dae Kim weld quals for 2017 were reviewed 5/31/2017. There has not been any welding projects during this inspection time.

TDC.WELDINSP: New Tank Piping - Construction Weld Inspection (Re-Presented)

- 34. Question Result, ID, Sat, DC.WELDINSP.GIRTHWELDNDT.R, 195.234(d) (195.266(a)) (also presented in: DC.WELDINSP) References
 - Question Text Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?

Assets Covered 8275

- Result Notes They X-rayed 100% of girth welds in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and were reviewed.
- 35. Question Result, ID, Sat, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a)) (also presented in: References DC.WELDINSP)
 - Question Text Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?

Assets Covered 8275

- Result Notes They X-rayed 100% in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and I reviewed.
- 36. Question Result, ID, Sat, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a)) (also presented in: DC.WELDINSP) References
 - Question Text Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?

Assets Covered 8275

- Result Notes They X-rayed 100% in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and I reviewed.
- 37. Question Result, ID, Sat, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a)) (also presented in: DC.WELDINSP)
 References
 - Question Text Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tieins?

Assets Covered 8275

Result Notes They X-rayed 100% in 2017 (Sefnco repair) and the procedure is in the Maintenance Section B-3 7.2. Records are available for that project and I reviewed.

EP.EPO: Emergency Planning OPA

38. Question Result, ID, Paferences Sat, EP.EPO.OPALOCATION.O, 194.111(a) (194.111(b))

Question Text Is the response plan maintained at required locations?

Assets Covered 8275

Result Notes Copies of the response plan are available in various locations - both in the control room and in the administrative offices.

EP.ERL: Emergency Response Liquids

39. Question Result, ID, References Sat, EP.ERL.LOCATION.O, 195.402(a)

Question Text Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?

Assets Covered 8275

Result Notes The EP&P is available in multiple locations.

- 40. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: PD.PA)
 - Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

Assets Covered 8275

Result Notes PM 1813 for PA mailings. Every year they mail to FRs 9/9/19 and 9/6/21. A copy of the mailing was reviewed. The 2021 report was available and I reviewed the brochure for the public officials in the 2020 mailing. I reviewed the postage reciepts for the mailings.

41. Question Result, ID, NA, EP.ERL.NOTICES.R, 195.402(a) (195.402(e)(1))
References

Question Text Do records indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures?

Assets Covered 8275

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The 8/2/2017 response timeline was reviewed.

42. Question Result, ID, Sat, EP.ERL.AUTHORITIES.R, 195.402(a) (195.402(e)(7)) References

Question Text Do records indicate that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLs)?

Assets Covered 8275

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The 8/2/2017 response timeline was reviewed.

43. Question Result, ID, Sat, EP.ERL.POSTEVNTREVIEW.R, 195.402(a) (195.402(e)(7), 195.402(e)(9)) References

Question Text Do records indicate post-accident reviews of employee activities were performed to determine whether the procedures were effective in each emergency and take corrective action where deficiencies are found?

Assets Covered 8275

Result Notes The 8/2/2017 post accident review was observed in Section 4.2.

44. Question Result, ID, Sat, EP.ERL.COMMSYS.R, 195.408(b)

Question Text Do records indicate emergency communication system(s) use was as required?

Assets Covered 8275

Result Notes The 8/2/2017 post accident review was looked at with the communication timeline.

EP.ETR: Emergency Training of Personnel

45. Question Result, ID, Sat, EP.ETR.TRAINING.R, 195.403(a) References

Question Text Do records indicate the operator provided training to its emergency response personnel as required?

Assets Covered 8275

Result Notes ERP- 10A/B, Operator Training, Spill Drill 2021. I reviewed the letter from September 23, 2021 from Ecology.

46. Question Result, ID, Sat, EP.ETR.TRAININGREVIEW.R, 195.403(b)

Question Text Have annual reviews of the emergency response training program been conducted and appropriate changes made as necessary to ensure it is effective?

Assets Covered 8275

Result Notes ERP-10A as part of the MPL annual presentation in May 2021, 2020, and 2019.

47. Question Result, ID, Sat, EP.ETR.TRAININGSUPERVISE.R, 195.403(c) References

Question Text Do records indicate verification that supervisors are knowledgeable of emergency response procedures for which they are responsible?

Assets Covered 8275

Result Notes The operators do the Task 40 training. The supervisors are trained every three years and evaluated. Records reviewed for Steve Calton. Inspect coating for 3rd party damage during

response. ERP 10A training for Steve Calton was reviewed for 6/2/2021. These are done annually. John Williamson's training for 10-A was done in 6/2/2021.

48. Question Result, ID, NA, EP.ETR.TRAININGSUPERVISE.O, 195.403(c)

References

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

Assets Covered 8275

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

FS.TSAPIINSPECT: Tanks and Storage - Inspection

49. Question Result, ID, NA, FS.TSAPIINSPECT.BOINSPECTION.R, 195.404(c)(3) (195.432(a)) References

> Question Text Do records document that breakout tanks that are not steel atmospheric or low pressure tanks or HVL steel tanks built according to API 2510 have been inspected at the proper interval and that deficiencies found during inspections have been corrected?

Assets Covered 8275

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

50. Question Result, ID, NA, FS.TSAPIINSPECT.BOINSRVCINSP.P, 195.402(c)(3) (195.432(b)) References

> Question Text Does the process describe the interval and method for performing routine in-service inspections of steel atmospheric or low pressure breakout tanks?

Assets Covered 8275

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

51. Question Result, ID, NA, FS.TSAPIINSPECT.BOINSRVCINSP.R, 195.404(c)(3) (195.432(b)) References

> Question Text Do records document that steel atmospheric or low pressure breakout tanks have received routine inservice inspections at the required intervals and that deficiencies found during inspections have been documented?

Assets Covered 8275

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

52. Question Result, ID, NA, FS.TSAPIINSPECT.BOEXTINSP.P, 195.402(c)(3) (195.432(b)) References

> Question Text Does the process describe the interval and method for performing external inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?

Assets Covered 8275

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

53. Question Result, ID, NA, FS.TSAPIINSPECT.BOEXTINSP.R, 195.404(c)(3) (195.432(b)) References

> Question Text Do records document that steel atmospheric or low pressure breakout tanks have received external inspections at the required intervals and that deficiencies documented during inspections have been corrected within a reasonable time frame?

Assets Covered 8275

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

54. Question Result, ID, NA, FS.TSAPIINSPECT.BOEXTUTINSP.P, 195.402(c)(3) (195.432(b)) References

> Question Text Does the process describe the interval and method for performing external, ultrasonic thickness inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?

Assets Covered 8275

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

55. Question Result, ID, NA, FS.TSAPIINSPECT.BOEXTUTINSP.R, 195.404(c)(3) (195.432(b)) References

> Question Text Do records document that steel atmospheric or low pressure breakout tanks have received ultrasonic thickness inspections at the required intervals and that deficiencies found during inspections have been documented?

Assets Covered 8275

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

56. Question Result, ID, NA, FS.TSAPIINSPECT.BOINTINSP.P, 195.402(c)(3) (195.432(b))

Question Text Does the process describe the interval and method for performing formal internal inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?

Assets Covered 8275

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

57. Question Result, ID, NA, FS.TSAPIINSPECT.BOINTINSP.R, 195.404(c)(3) (195.432(b)) References

Question Text Do records document that steel atmospheric or low pressure breakout tanks have received formal internal inspections at the required intervals and that deficiencies found during inspections have been documented?

Assets Covered 8275

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

58. Question Result, ID, NA, FS.TSAPIINSPECT.BOEXTINSPAPI2510.P, 195.402(c)(3) (195.432(c)) References

Question Text Does the process describe the interval and method for performing visual external inspections of in-service pressure steel aboveground breakout tanks built to API Standard 2510?

Assets Covered 8275

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

59. Question Result, ID, NA, FS.TSAPIINSPECT.BOEXTINSPAPI2510.R, 195.404(c)(3) (195.432(c))

Question Text Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 have received visual external inspections at the required intervals and that deficiencies found have been corrected?

Assets Covered 8275

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

60. Question Result, ID, NA, FS.TSAPIINSPECT.BOINTINSPAPI2510.P, 195.402(c)(3) (195.432(c)) References

Question Text Does the process describe the interval and method for performing internal inspections of in-service pressure steel aboveground breakout tanks built to API Standard 2510?

Assets Covered 8275

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

61. Question Result, ID, NA, FS.TSAPIINSPECT.BOINTINSPAPI2510.R, 195.404(c)(3) (195.432(c))

Question Text Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 received internal inspections at the required intervals and that deficiencies found have been corrected?

Assets Covered 8275

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

62. Question Result, ID, NA, FS.TS.BOINSPECTION.O, 195.432(a) (195.432(b), 195.432(c), 195.401(b)) (also presented in: References FS.TS)

Question Text Is the condition of steel atmospheric or low pressure tanks acceptable?

Assets Covered 8275

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

FS.FG: Facilities General

63. Question Result, ID, Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: PD.SN) References

Question Text Are facilities adequately protected from vandalism and unauthorized entry?

Assets Covered 8275

Result Notes The facilities are well secured.

64. Question Result, ID, Sat, FS.FG.IGNITION.O, 195.438 (also presented in: PD.SN)

Question Text Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?

Assets Covered 8275

Result Notes There is suitable signage.

65. Question Result, ID, Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: PD.SN)

Question Text Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?
Assets Covered 8275

Result Notes There is suitable signage.

66. Question Result, ID, Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: PD.SN)

Question Text Does the process require operator signs to be posted around each pump station and breakout tank area?

Result Notes Maintenance Manual D-2 Line Markers 4.1. The pump station is well within the facility and the above ground valve station has the operator name with contact information.

67. Question Result, ID, Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: PD.SN) References

Question Text Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?

Assets Covered 8275

Result Notes The check valve station falls under the signage portion of above ground facilities for D-2 Section 4.1. and D-10 2.7.

68. Question Result, ID, Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: PD.SN)

Question Text Does the process require facilities to be protected from vandalism and unauthorized entry?

Assets Covered 8275

Result Notes Maint Manual D-10 covers security fences. D-10 4.1

69. Question Result, ID, Sat, FS.FG.FIREPROT.P, 195.402(c)(3) (195.430(a), 195.430(b), 195.430(c))

Question Text Does the process require firefighting equipment at pump station/breakout tank areas?

Assets Covered 8275

Result Notes D-14 Fire Extinguishers

70. Question Result, ID, Sat, FS.FG.FIREPROT.R, 195.404(c)(3) (195.430(a), 195.430(b), 195.430(c))

Question Text Are records of inspections of firefighting equipment adequate?

Assets Covered 8275

Result Notes PM 0080 (6 - Month inspection) Reviewed records to 2016.

71. Question Result, ID, Sat, FS.FG.FIREPROT.O, 195.430(a) (195.430(b), 195.430(c), 195.262(e)) References

Question Text Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly?

Assets Covered 8275

Result Notes The fire suppression equipment has been checked monthly and was last serviced in July of 2021.

FS.PS: Pump Stations

72. Question Result, ID, Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: MO.LMOPP) References

Question Text Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?

Assets Covered 8275

Result Notes PM 0961 is an RV on pipeline for thermal relief. Several years of records worth. PM 0980 is the same inspection for thermal reliefs, but for the valves at the base.

73. Question Result, ID, Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: MO.LMOPP)
References

Question Text Are inspections of overpressure safety devices adequate (including HVL lines)?

Assets Covered 8275

Result Notes The thermal relief at the launcher, RV-1407, is tagged with a pressure of 720 psig. The pump curve will not allow over-pressuring of the line.

74. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426 (also presented in: MO.LMOPP)

Question Text Are launchers and receivers equipped with relief devices?

Assets Covered 8275

Result Notes The barrel is equipped with taps to allow the relief of product and pressure.

FS.TS: Tanks and Storage

75. Question Result, ID, NA, FS.TS.OVERFILLBO.P, 195.402(c)(3) (195.428(a), 195.428(c), 195.428(d))

Question Text Does the process require adequate testing and inspection of overfill devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]

Assets Covered 8275

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

76. Question Result, ID, NA, FS.TS.OVERFILLBO.R, 195.404(c)(3) (195.428(a), 195.428(c), 195.428(d)) References

Question Text Do records document the inspection and testing of overfill protection devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]

Assets Covered 8275

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

77. Question Result, ID, NA, FS.TS.OVERFILLBO.O, 195.428(c)

Question Text Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]

Assets Covered 8275

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

78. Question Result, ID, NA, FS.TS.BOINSPECTION.O, 195.432(a) (195.432(b), 195.432(c), 195.401(b)) (also presented in: References FS.TSAPIINSPECT)

Question Text Is the condition of steel atmospheric or low pressure tanks acceptable?

Assets Covered 8275

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

79. Question Result, ID, NA, FS.TS.IGNITIONBO.P, 195.402(c)(3) (195.405(a))

Question Text Does the process describe how the operator protects against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities of aboveground breakout tanks?

Assets Covered 8275

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

80. Question Result, ID, NA, FS.TS.IGNITIONBO.R, 195.404(c) (195.405(a)) References

Question Text Do records indicate protection against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities of aboveground breakout tanks?

Assets Covered 8275

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

Report Filters: Results: all

81. Question Result, ID, NA, FS.TS.FLOATINGROOF.P, 195.402(c)(3) (195.405(b)) References

Question Text Does the process associated with access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance or repair activities of in-service tanks indicate that the operator has reviewed and considered the potentially hazardous conditions, safety practices and procedures in API Publication 2026?

Assets Covered 8275

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

82. Question Result, ID, NA, FS.TS.FLOATINGROOF.R, 195.404(c) (195.405(b))

Question Text Do records indicate access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance, or repair activities of in-service tanks is performed consistent with API Publication 2026?

Assets Covered 8275

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

83. Question Result, ID, NA, FS.TS.IMPOUNDBO.R, 195.404(c) (195.264(b))

Question Text If a breakout tank first went into service after October 2, 2000 do records indicate it has an adequate impoundment?

Assets Covered 8275

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

84. Question Result, ID, NA, FS.TS.IMPOUNDBO.O, 195.264(b)

Question Text If a breakout tank first went into service after October 2, 2000 does it have an adequate impoundment? Assets Covered 8275

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

85. Question Result, ID, NA, FS.TS.VENTBO.R, 195.404(c) (195.264(d))

Question Text Do records indicate that normal/emergency relief venting and pressure/vacuum-relieving devices installed on aboveground breakout tanks after October 2, 2000 are adequate?

Assets Covered 8275

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

86. Question Result, ID, NA, FS.TS.PRESSTESTBO.R, 195.310(a) (195.310(b), 195.307) References

Question Text Have aboveground breakout tanks been pressure tested to their corresponding API or ASME Standard or Specification and do pressure test records contain the required information?

Assets Covered 8275

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

FS.VA: Valves

87. Question Result, ID, Sat, MO.LM.VALVEMAINT.R, 195.404(c) (195.420(a), 195.420(b)) (also presented in: MO.LM) References

Question Text Do records indicate each mainline valve was inspected as required?

Assets Covered 8275

Result Notes 10/27/21, 6/15/21, 11/19/20, 5/27/20, 11/12/19, 5/21/19 they were completed.

88. Question Result, ID, Sat, MO.LM.VALVEMAINT.O, 195.420(a) (195.420(c)) (also presented in: MO.LM)

Question Text Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?

Assets Covered 8275

Result Notes Valve at MP 2.5 was checked for operation during the field portion.

MO.LO: Liquid Pipeline Operations

89. Question Result, ID, Sat, MO.LO.OMMANUALREVIEW.R, 195.402(a)

Question Text Do records indicate annual reviews of the written procedures in the manual were conducted as required?

Assets Covered 8275

Result Notes The manual was reviewed on 12/23/2020 and 12/20/2019.

90. Question Result, ID, Sat, MO.LO.OMHISTORY.P, 195.402(a) (195.402(c)(1), 195.404(a), 195.404(a)(1), 195.404(a)(2), References 195.404(a)(3), 195.404(a)(4), 195.404(c)(1), 195.404(c)(2), 195.404(c)(3))

Question Text Does the process address making construction records, maps, and operating history available as necessary for safe operation and maintenance?

Assets Covered 8275

Result Notes This is in maintenance manual B-1.

91. Question Result, ID, Sat, MO.LO.OMHISTORY.R, 195.404(a) (195.404(c), 195.9, 195.402(c)(1)) References

Question Text Do records indicate current maps and records of the pipeline system are maintained and made available as necessary?

Assets Covered 8275

Result Notes Maps are in NPMS, P&ID, and MPL Atlas.

92. Question Result, ID, Sat, MO.LO.OMEFFECTREVIEW.R, 195.402(a) (195.402(c)(13), 195.404(a)) References

Question Text Do records indicate periodic review of the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and corrective action taken where deficiencies are found?

Assets Covered 8275

Result Notes Paul Daza and Mike Pilkenton OQ test were reviewed as samples.

MO.LOMOP: Liquid Pipeline MOP

93. Question Result, ID, References Sat, MO.LOMOP.MOPDETERMINE.R, 195.402(c)(3) (195.406(a), 195.406(b), 195.302(b), 195.302(c))

Question Text Do records indicate the maximum operating pressure was established in accordance with 195.406? Assets Covered 8275

Result Notes This is in the surge analysis done by Veco Eng. Aug 20, 1999. MOP is 720 the NOP is 450.

MO.LMOPP: Liquid Pipeline Overpressure Protection

94. Question Result, ID, Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: FS.PS) References

Question Text Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?

Assets Covered 8275

Result Notes PM 0961 is an RV on pipeline for thermal relief. Several years of records worth. PM 0980 is the same inspection for thermal reliefs, but for the valves at the base.

95. Question Result, ID, Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: FS.PS) References

Question Text Are inspections of overpressure safety devices adequate (including HVL lines)?

Assets Covered 8275

Result Notes The thermal relief at the launcher, RV-1407, is tagged with a pressure of 720 psig. The pump curve will not allow over-pressuring of the line.

96. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426 (also presented in: FS.PS)

Question Text Are launchers and receivers equipped with relief devices?

Assets Covered 8275

Result Notes The barrel is equipped with taps to allow the relief of product and pressure.

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

97. Question Result, ID, Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: PD.RW) References

Question Text Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?

Assets Covered 8275

Result Notes I reviewed a selection of the weekly patrols for 2021. The patrols are being performed above and beyond the requirement.

August 21,2021 was the five year navigable waterway inspection that utilized divers to probe the river bed for depth of cover.

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

98. Question Result, ID, Sat, MO.ABNORMAL.ABNORMAL.R, 195.404(b) (195.402(d)(1)) References

Question Text Do records indicate operator's personnel responded to indications of abnormal operations as required by the written procedures?

Assets Covered 8275

Result Notes The 2017 record had post accident review. There were no other abnormal operations since the last inspection.

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

99. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 195.412(a) (also presented in: PD.RW) References

Question Text Are the ROW conditions acceptable for the type of patrolling used?

Assets Covered 8275

Result Notes Patrols are done by walking and driving. The ROW is suitable for this method.

MO.LM: Liquid Pipeline Maintenance

100. Question Result, ID, Sat, MO.LM.VALVEMAINT.R, 195.404(c) (195.420(a), 195.420(b)) (also presented in: FS.VA) References

Question Text Do records indicate each mainline valve was inspected as required?

Assets Covered 8275

Result Notes 10/27/21, 6/15/21, 11/19/20, 5/27/20, 11/12/19, 5/21/19 they were completed.

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

101. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: PD.RW) References

Question Text Are line markers placed and maintained as required?

Assets Covered 8275

Result Notes The line is well marked.

MO.LM: Liquid Pipeline Maintenance

102. Question Result, ID, Sat, MO.LM.VALVEMAINT.O, 195.420(a) (195.420(c)) (also presented in: FS.VA) References

Question Text Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?

Assets Covered 8275

Result Notes Valve at MP 2.5 was checked for operation during the field portion.

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

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103. Question Result, ID, Sat, MO.ABNORMAL.ABNORMALREVIEW.R, 195.404(b) (195.402(d)(5)) References

Question Text Do records indicate post-event reviews of actions taken by operator personnel to determine the effectiveness of the abnormal operation procedures and whether corrective actions were taken deficiencies were found?

Assets Covered 8275

Result Notes The 2017 record had post accident review. There were no other abnormal operations since the last inspection.

MO.LC: Liquid Conversion

104. Question Result, ID, NA, MO.LC.CONVERSION.R, 195.5(c) (195.5(a))

Question Text *Do records indicate the process was followed for converting any pipelines into Part 195 service?*Assets Covered 8275

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

MO.EW: Extreme Weather

105. Question Result, ID, NA, MO.EW.EXTWEATHERINSPIMPL.R, 195.404(c) (195.414(a), 195.414(b), 195.414(c), 195.414(d)) References

Question Text Do records indicate the operator conducted the required inspection following and extreme weather or natural disaster event?

Assets Covered 8275

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

106. Question Result, ID, NA, MO.EW.EXTWEATHERINSPSAFE.O, 195.414(d)

Question Text Are the pipeline facilities that were affected by an extreme weather or natural disaster event back to a safe operating condition?

Assets Covered 8275

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

PD.DP: Damage Prevention

107. Question Result, ID, Sat, PD.DP.PROGRAM.R, 195.442(a)

Question Text Do records indicate the damage prevention program is being carried out as written?

Assets Covered 8275

Result Notes An effectiveness review was done in 2020. The previous effectiveness was done in 2019 and 2018. The records for mailings including postage were reviewed.

PD.PA: Public Awareness

108. Question Result, ID, NC, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162 References Section 3)

Question Text Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

109. Question Result, ID, NC, PD.PA.EDUCATE.R, 195.440(d) (195.440(f)) References

Question Text Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a hazardous liquid or carbon dioxide pipeline facility; (3) Physical indications of a possible release; (4) Steps to be

taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; and (5) Procedures to report such an event?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

110. Question Result, ID, NC, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f)) References

Question Text Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

111. Question Result, ID, NC, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1)
References

Question Text Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

112. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: EP.ERL)

Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

Assets Covered 8275

Result Notes PM 1813 for PA mailings. Every year they mail to FRs 9/9/19 and 9/6/21. A copy of the mailing was reviewed. The 2021 report was available and I reviewed the brochure for the public officials in the 2020 mailing. I reviewed the postage reciepts for the mailings.

113. Question Result, ID, NC, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 Section 2.3.1) References

Question Text Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

114. Question Result, ID, NC, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)
References

Question Text Has an audit or review of the public awareness program implementation been performed annually since the program was developed?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

115. Question Result, ID, NC, PD.PA.AUDITMETHODS.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)

Question Text Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of the public awareness program implementation?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

116. Question Result, ID, NC, PD.PA.PROGRAMIMPROVE.R, 195.440(c) (API RP 1162 Section 8.3) References

Question Text Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

117. Question Result, ID, NC, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 Sections 8.4)

Question Text Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

118. Question Result, ID, NC, PD.PA.MEASUREOUTREACH.R, 195.440(c) (API RP 1162 Section 8.4.1)
References

Question Text In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

119. Question Result, ID, NC, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(c) (API RP 1162 Section 8.4.2) References

Question Text In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

120. Question Result, ID, NC, PD.PA.MEASUREBEHAVIOR.R, 195.440(c) (API RP 1162 Section 8.4.3)

Question Text In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

121. Question Result, ID, NC, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 Section 8.4.4)

Question Text Did the operator attempt to measure bottom-line results of the program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

122. Question Result, ID, NC, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) References

Question Text Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?

Assets Covered 8275

Result Notes 8276 is the Public Awareness full program inspection that we will be conducting in conjunction with this inspection. These questions will be addressed in that inspection to minimize redundancy.

PD.RW: ROW Markers, Patrols, Monitoring

123. Question Result, ID, References Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: MO.RW)

Question Text Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?

Assets Covered 8275

Result Notes I reviewed a selection of the weekly patrols for 2021. The patrols are being performed above and beyond the requirement.

August 21,2021 was the five year navigable waterway inspection that utilized divers to probe the river bed for depth of cover.

124. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 195.412(a) (also presented in: MO.RW)

Question Text Are the ROW conditions acceptable for the type of patrolling used?

Assets Covered 8275

Result Notes Patrols are done by walking and driving. The ROW is suitable for this method.

125. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: MO.RW)

Question Text Are line markers placed and maintained as required?

Assets Covered 8275

Result Notes The line is well marked.

PD.SN: Facilities Signage and Security

126. Question Result, ID, Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: FS.FG)

Question Text Are facilities adequately protected from vandalism and unauthorized entry?

Assets Covered 8275

Result Notes The facilities are well secured.

127. Question Result, ID, Sat, FS.FG.IGNITION.O, 195.438 (also presented in: FS.FG)

Question Text Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?

Assets Covered 8275

Result Notes There is suitable signage.

128. Question Result, ID, Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: FS.FG)

Question Text Are there operator signs around each pumping station, breakout tank area, and other applicable facilities? Assets Covered 8275

Result Notes There is suitable signage.

129. Question Result, ID, Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: FS.FG)

Question Text Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?

Assets Covered 8275

Result Notes The check valve station falls under the signage portion of above ground facilities for D-2 Section 4.1. and D-10 2.7.

130. Question Result, ID, References Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: FS.FG)

Question Text Does the process require facilities to be protected from vandalism and unauthorized entry?

Assets Covered 8275

Result Notes Maint Manual D-10 covers security fences. D-10 4.1

131. Question Result, ID, Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: FS.FG)

Question Text Does the process require operator signs to be posted around each pump station and breakout tank area? Assets Covered 8275

Result Notes Maintenance Manual D-2 Line Markers 4.1. The pump station is well within the facility and the above ground valve station has the operator name with contact information.

RPT.RR: Regulatory Reporting (Traditional)

132. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 195.49 (195.13(b), 195.15(b))

Question Text Do the records indicate that complete and accurate Annual Reports have been submitted?

Assets Covered 8275

Result Notes Annual Reports have been submitted for 2018-2021 and information has been validated.

133. Question Result, ID, NA, RPT.RR.GRAVITY.R, 195.49 (195.13(b))
References

Question Text Do Annual Reports include applicable information for gravity lines?

Assets Covered 8275

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

134. Question Result, ID, NA, RPT.RR.REGONLYGATHER.R, 195.49 (195.15(b)) References

Question Text Do Annual Reports include applicable information for regulated-only gathering lines?

Assets Covered 8275

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

135. Question Result, ID, NA, RPT.RR.ACCIDENTREPORT.R, 195.54(a) (195.50(a), 195.50(b), 195.50(c), 195.50(d), 195.50(e), References 195.13(b), 195.15(b))

Question Text Do records indicate the original accident reports were filed as required?

Assets Covered 8275

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

136. Question Result, ID, NA, RPT.RR.ACCIDENTREPORTSUPP.R, 195.54(b) (195.13(b), 195.15(b)) References

Question Text Do records indicate accurate supplemental accident reports were filed and within the required timeframe? Assets Covered 8275

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

137. Question Result, ID, NA, RPT.RR.IMMEDREPORT.R, 195.52(a) (195.52(b), 195.52(c), 195.52(d)) References

Question Text Do records indicate immediate notifications of accidents were made in accordance with 195.52?

Assets Covered 8275

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

138. Question Result, ID, NA, RPT.RR.SRCR.R, 195.56(a) (195.55(a), 195.55(b), 195.56(b), 195.13(b), 195.15(b)) References

Question Text Do records indicate safety-related condition reports were filed as required?

Assets Covered 8275

Result Notes No such event occurred, or condition existed, in the scope of inspection review. 2019 ILI had no inidcations rising to the level of an SRC

139. Question Result, ID, Sat, RPT.RR.NPMSANNUAL.R, 195.61(a) (195.61(b)) References

Question Text Do records indicate: NPMS submissions are completed each year, on or before June 15, representing all in service, idle and retired assets as of December 31 of the previous year, and if no modifications occurred an email to that effect was submitted?

Assets Covered 8275

Result Notes PM2236 NPMS Updates are scheduled in Maximo. I reviewed the 3/9/2021 submission and the one from March 4, 2020.

TD.ATM: Atmospheric Corrosion

140. Question Result, ID, Sat, TD.ATM.ATMCORRODECOAT.P, 195.402(c)(3) (195.581(a), 195.581(b), 195.581(c))

Question Text Does the process give adequate instruction for the protection of pipeline against atmospheric corrosion?

Assets Covered 8275

Result Notes E-8 in the Maint Manual.

141. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.P, 195.402(c)(3) (195.583(a), 195.583(b), 195.583(c)) References

Question Text Does the process give adequate instruction for the inspection of aboveground pipeline segments exposed to the atmosphere?

Assets Covered 8275

Result Notes PM-972 gives guidance for weekly patrols and G-2 in the Maintenance Manual.

142. Question Result, ID, Paterances Sat, TD.ATM.ATMCORRODEINSP.R, 195.589(c) (195.583(a), 195.583(b), 195.583(c))

Question Text Do records document inspection of aboveground pipe exposed to atmospheric corrosion?

Assets Covered 8275

Result Notes These are done weekly in PM972 9-12-21, 9-9-21, 9-1-21, 8-26-21, 8-18-21, .etc .etc.

143. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.O, 195.583(c) (195.581(a)) References

Question Text Is aboveground pipe that is exposed to atmospheric corrosion protected?

Assets Covered 8275

Result Notes The above ground portions of the line are well coated.

TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection

144. Question Result, ID, NA, TD.CPBO.BO651.P, 195.402(c)(3) (195.565, 195.563(d))
References

Question Text Does the process describe when cathodic protection must be installed on breakout tanks?

Assets Covered 8275

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

145. Question Result, ID, NA, TD.CPBO.BO.P, 195.402(c)(3) (195.573(d))

Question Text Does the process adequately detail when and how cathodic protection systems will be inspected on breakout tanks?

Assets Covered 8275

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

146. Question Result, ID, NA, TD.CPBO.BO.R, 195.589(c) (195.573(d))
References

Question Text Do records adequately document when and how cathodic protection systems were inspected on breakout tanks?

Assets Covered 8275

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

147. Question Result, ID, NA, TD.CPBO.BO.O, 195.573(d)
References

Question Text Are cathodic protection monitoring tests performed correctly on breakout tank bottoms?

Assets Covered 8275

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

148. Question Result, ID, NA, TD.CPBO.DEFICIENCYBO.P, 195.402(c)(3) (195.573(e))

Question Text Does the process require correction of any identified deficiencies in corrosion control for breakout tanks?

Assets Covered 8275

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

149. Question Result, ID, NA, TD.CPBO.DEFICIENCYBO.R, 195.589(c) (195.573(e))

Question Text Do records document adequate operator actions taken to correct any identified deficiencies in breakout tank corrosion control?

Assets Covered 8275

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

TD.CP: External Corrosion - Cathodic Protection

150. Question Result, ID, Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b)) (also presented in: TQ.QU) References

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

Assets Covered 8275

Result Notes Managed by Jeremy Hailey Northwest Corrosion Engineering. I reviewed his CP cards.

151. Question Result, ID, NA, TD.CP.NEWOPERATE.R, 195.589(c) (195.563(a)) References

Question Text Do records document when cathodic protection was operational on constructed, relocated, replaced, converted to service, or otherwise changed pipelines?

Assets Covered 8275

Result Notes No such event occurred, or condition existed, in the scope of inspection review. D-6 is the procedure for new installation.

152. Question Result, ID, NA, TD.CP.UNPROTECT.R, 195.589(c) (195.573(b)(1), 195.573(b)(2))

Question Text Do records document the adequate re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?

Assets Covered 8275

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

153. Question Result, ID, Sat, TD.CP.ISOLATE.R, 195.589(c) (195.575(a), 195.575(b), 195.575(c), 195.575(d)) References

Question Text Do records document adequate electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

Assets Covered 8275

Result Notes 2018-2021 is available. 2021 reviewed and demonstrates casing isolation. I reviewed the annual report from Jeremy Hailey and we discussed the recommendations.

154. Question Result, ID, Sat, TD.CP.ISOLATE.O, 195.575(a) (195.575(b), 195.575(c), 195.575(d)) References

Question Text Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

Assets Covered 8275

Result Notes The casing and carrier isolation is checked during the annual CP survey. Readings obtained during the field portion of this inspection also demonstrated isolation.

Field Observations

MP 2.5 Casing -741 mV PSP CSE (On)

MP 2.5 Carrier -1282 mV PSP CSE (On)

16th and 97th Casing -661 mV PSP CSE (On)

16th and 97th Carrier -1781 mV PSP CSE (On)

155. Question Result, ID, Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)
References

Question Text Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?

Assets Covered 8275

Result Notes We discussed. New CP test station installed on Waller per recommendation of CP supervisor.

Report Filters: Results: all

156. Question Result, ID, References Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CPMONITOR)

Question Text Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?

Assets Covered 8275

Result Notes Stations shown MPL Atlas.

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

157. Question Result, ID, Sat, TD.CPMONITOR.TESTLEADMAINT.R, 195.589(c) (195.567(c))

Question Text Do records document that CP test lead wires have been properly maintained?

Assets Covered 8275

Result Notes These are documented on the annual CP survey.

158. Question Result, ID, Sat, TD.CPMONITOR.TESTLEADMAINT.O, 195.567(c) References

Question Text Are CP test lead wires properly maintained?

Assets Covered 8275

Result Notes The test leads are in excellent condition.

159. Question Result, ID, Peferences Sat, TD.CPMONITOR.MONITORCRITERIA.P, 195.402(c)(3) (195.571)

Question Text Does the process require that CP monitoring criteria be used that is acceptable?

Assets Covered 8275

Result Notes This is in D-6 2.1.1 2.1.2

160. Question Result, ID, Sat, TD.CPMONITOR.MONITOR.O, 195.571

Question Text Do the methods for taking CP monitoring readings allow for the application of appropriate CP monitoring criteria?

Assets Covered 8275

Result Notes Waller and 44th Carrier -1562 mV PSP CSE (On)

Waller and 72nd Carrier -1582 mV PSP CSE (On)

97th and 22nd Carrier -1885 mV PSP CSE (On)

10306 "A" Street Carrier -1754 mV PSP CSE (On)

Park and 114th Carrier -1857 mV PSP CSE (On)

1108 114th Carrier -1772 mV PSP CSE (On)

114th and South Sheridan Carrier -1712 mV PSP CSE (On)

116th and Spanaway Loop Carrier -1724 mV PSP CSE (On)

JBLM Fence -1635 mV PSP CSE (On)

161. Question Result, ID, Sat, TD.CPMONITOR.TEST.R, 195.589(c) (195.573(a)(1))

Question Text Do records adequately document required tests have been done on pipe that is cathodically protected? Assets Covered 8275

Result Notes This was reviewed in the prior question

162. Question Result, ID, Sat, TD.CPMONITOR.CIS.R, 195.589(c) (195.573(a)(2)) References

Question Text Do records document, when circumstances dictated a need for close interval surveys, dates of completed surveys and analysis of completed surveys?

Assets Covered 8275

Result Notes The last close interval survey was done in 4/20/2018. This was why they added a station at Waller Rd.

163. Question Result, ID, Sat, TD.CPMONITOR.CURRENTTEST.R, 195.589(c) (195.573(c))

Question Text Do records document adequate electrical checks of rectifiers, interference bonds, diodes, and reverse current switches and at the required intervals?

Assets Covered 8275

Result Notes Annually the full check is done. John does a weekly check to make sure the rectifier works properly. Weekly records

164. Question Result, ID, Sat, TD.CPMONITOR.CURRENTTEST.O, 195.573(c) References

Question Text Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?

Assets Covered 8275

Result Notes The rectifier is operating properly at 93rd and 24th St. The tap settings were C1 F3. It was putting out 15A of current at 15VDC during the time of inspection. There are critical or non-critical bonds in the system.

165. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENT.P, 195.402(c)(3) (195.577(a), 195.577(b))
References

Question Text Does the operator have a process in place to minimize detrimental effects of interference currents on its pipeline system and do the procedures for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?

Assets Covered 8275

Result Notes The procedure is in D-6 3.7

166. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENT.R, 195.589(c) (195.577(a)) References

Question Text Do records document that the operator has an effective program in place to minimize the detrimental effects of interference currents on their pipeline system, and is minimizing detrimental effects of interference currents from their CP systems on other underground metallic structures?

Assets Covered 8275

Result Notes The CIS was 4/30/18 and interference currents are checked in the annual survey.

167. Question Result, ID, NA, TD.CPMONITOR.INTERCURRENT.O, 195.577(a) References

Question Text Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?

Assets Covered 8275

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

168. Question Result, ID, Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED) References

Question Text Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?

Assets Covered 8275

Result Notes We discussed. New CP test station installed on Waller per recommendation of CP supervisor.

169. Question Result, ID, Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CP) References

Question Text Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?

Assets Covered 8275

Result Notes Stations shown MPL Atlas.

TD.COAT: External Corrosion - Coatings

170. Question Result, ID, Sat, TD.COAT.NEWPIPE.R, 195.589(c) (195.557(a), 195.559, 195.401(c)) References

Question Text Do records document that coatings for pipelines constructed, relocated, replaced, or otherwise changed meet the requirements of 195.559?

Assets Covered 8275

Result Notes In 2019 the coating was removed for ILI digs. They used the Polykin tape and wax tape for the clock springs.

171. Question Result, ID, NA, TD.COAT.CONVERTPIPE.R, 195.589(c) (195.557(b), 195.559)
References

Question Text Do records document that pipelines that have been converted to liquid service and were constructed after the applicable date in 195.401(c) have external coating?

Assets Covered 8275

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

172. Question Result, ID, NA, TD.COAT.COATAPPLY.O, 195.561(a) (195.561(b), 195.559(b), 195.252(b))

Question Text Is protective coating adequately applied?

Assets Covered 8275

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

TD.CPEXPOSED: External Corrosion - Exposed Pipe

173. Question Result, ID, Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 195.589(c) (195.569)

Question Text Do records document that exposed buried piping was adequately examined for corrosion and deteriorated coating?

Assets Covered 8275

Result Notes This was done in the 2019 digs.

174. Question Result, ID, Sat, TD.CPEXPOSED.EXTCORRODEREPAIR.R, 195.589(c) (195.585(a), 195.585(b)) References

Question Text Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?

Assets Covered 8275

Result Notes They had a 41% metal loss ILI called out (measured .033") 18% at Mckinley St. It was replaced by a clock spring.

175. Question Result, ID, Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR) References

Question Text Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?

Assets Covered 8275

Result Notes We discussed. New CP test station installed on Waller per recommendation of CP supervisor.

TD.ICP: Internal Corrosion - Preventive Measures

176. Question Result, ID, NA, TD.ICP.INVESTREMED.R, 195.589(c) (195.579(a))
References

Question Text Do records document investigation and remediation of the corrosive effects of hazardous liquids or carbon dioxide being transported?

Assets Covered 8275

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

177. Question Result, ID, Sat, TD.ICP.INHIBITOR.R, 195.589(c) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text Do records document that corrosion inhibitors have been used in sufficient quantity?

Assets Covered 8275

Result Notes 2.5gal per 210000 gallons.

178. Question Result, ID, Sat, TD.ICP.EXAMINE.R, 195.589(c) (195.579(c), 195.579(a))

Question Text Do records document examination of removed pipe for evidence of internal corrosion?

Assets Covered 8275

Result Notes No removals since 2017

179. Question Result, ID, NA, TD.ICP.BOLINING.R, 195.589(c) (195.579(d))

Question Text Do records document the adequate installation of breakout tank bottom linings?

Assets Covered 8275

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

TQ.OQ: Operator Qualification

180. Question Result, ID, Sat, TQ.OQ.OQCONTRACTOR.R, 195.507(a) (195.507(b))

Question Text Are adequate records containing the required elements maintained for contractor personnel?

Assets Covered 8275

Result Notes CP contractor qualifications reviewed. General Mechanical stays up on Task 23 and 24 (Maintaning MPL qualifies as needed. In 2019 Micheals performed the repairs for the corrosion anomalies.

181. Question Result, ID, Sat, TQ.OQ.RECORDS.R, 195.507(a) (195.507(b)) References

> 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 8275

Result Notes For the 2019 ILI digs, qualifications were reviewed for the clock spring installers from Michaels (Cody Binge, Justin Hernandez, and Chris Allen)

TQ.QU: Qualification of Personnel - Specific Requirements

182. Question Result, ID, Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b)) (also presented in: TD.CP) References

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

Assets Covered 8275

Result Notes Managed by Jeremy Hailey Northwest Corrosion Engineering. I reviewed his CP cards.

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

183. Question Result, ID, Sat, TQ.QUOMCONST.INSPECTORQUAL.R, 195.204 References

> 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 8275

Result Notes Steve Calton and John Williamson would, for example, oversee coating applications. Welding insepctions are performed by the contractor. Task 39 is what they qualify them to. API-570 piping inspector.

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

184. Question Result, ID, Sat, 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 8275

Result Notes Mistras would do NDE inspections, but no welding has occurred during this inspection time period.

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.

Report Filters: Results: all

Inspection Output (IOR)

Inspection Information

Inspection Name 8276 McChord

Awareness

Status PLANNED

Start Year 2021

System Type HL

Protocol Set ID HL.2020.03

Operator(s) MCCHORD PIPELINE CO. (31049)

Lead David Cullom

Observer(s) Scott Rukke, Dennis Ritter, Lex Vinsel,

Anthony Dorrough, Derek Norwood,

Scott Anderson, Darren Tinnerstet

Supervisor Joe Subsits

Director Sean Mayo

Plan Submitted 04/23/2021

Plan Approval 04/26/2021

by Joe Subsits

All Activity Start 11/02/2021

All Activity End 11/03/2021

Inspection Submitted --Inspection Approval --

Inspection Summary

Inspection Summary - AFODs

This was a full Public Awareness Program inspection that occurred remotely via MS-Teams in conjunction with the Standard Liquid inspection for (2) days.

Findings

There were no probable violations or areas of concern.

Company Contacts

First Name	Last Name	Phone	Email	Organization	Position
Joel	Roppo	(253) 383-1651	jroppo@parpacific.com	Par Pacific	Chief Engineer

John Williamson (253) 383-1651 jwilliamson@parpacific.com Par Pacific Senior Inspector

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	% Complete
1	. 8276	8276	unit	88980	Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress	49	49	49	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.	8276	n/a	PD	P. R. O. S	Detail	

Plan Implementations

										Required
	Activity	SMART	Start Date	Focus	Involved	Qst			Total	%
#	Name	Act#	End Date	Directives	Groups/Subgroups Assets	Type(s)	Planned F	Required	Inspected	Complete
1	. PA		11/02/2021	n/a	all planned questions all	all types	49	49	49	100.0%
			11/03/2021		assets					

- 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	Public Awareness Inspection Attendance	COMPLETED	11/05/2021	PA	8276

Results (all values, 49 results)

62 (instead of 49) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERL: Emergency Response Liquids

1. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: PD.PA)

Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

Assets Covered 8276

Result Notes PM 1813 for PA mailings. Every year they mail to FRs 9/9/19 and 9/6/21. A copy of the mailing was reviewed. The 2021 report was available and I reviewed the brochure for the public officials in the 2020 mailing. I reviewed the postage receipts for the mailings. They have participated in the LEPC in the past. This may change slightly due to Covid.

FS.FG: Facilities General

2. Question Result, ID, Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: PD.SN) References

Question Text Are facilities adequately protected from vandalism and unauthorized entry?

Assets Covered 8276

Result Notes All facilities were protected using all means necessary from vandalism and unauthorized entry using gates, fences, and lock/chain assemblies.

3. Question Result, ID, Paferances Sat, FS.FG.IGNITION.O, 195.438 (also presented in: PD.SN)

Question Text Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?

Assets Covered 8276

Result Notes There is adequate signage and no smoking is allowed inside the facility. Open flames are prohibited as well.

4. Question Result, ID, Sat, FS.FG.IGNITION.R, 195.404(c) (195.438) (also presented in: PD.SN) References

Question Text Do records show precautions taken to prevent ignition sources in areas with a potential for accumulating flammable vapors or leaking hazardous liquids?

Assets Covered 8276

Result Notes The proc is in Section I of the maintenance manual.

5. Question Result, ID, Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: PD.SN)

Question Text Are there operator signs around each pumping station, breakout tank area, and other applicable facilities? Assets Covered 8276

Result Notes There is signage within the facility and at all above ground valve stations with the company name and emergency number.

6. Question Result, ID, Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: PD.SN) References

Question Text Does the process require operator signs to be posted around each pump station and breakout tank area? Assets Covered 8276

Result Notes D-2 in the Maintenance Manual

7. Question Result, ID, Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: PD.SN) References

Question Text Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?

Assets Covered 8276

Result Notes There is only smoking in designated areas only. No BO tanks

8. Question Result, ID, Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: PD.SN)

Question Text Does the process require facilities to be protected from vandalism and unauthorized entry?

Assets Covered 8276

Result Notes D-10 Maintenance Manual.

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

9. Question Result, ID, Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: PD.RW) References

Question Text Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?

Assets Covered 8276

Result Notes I reviewed a selection of the weekly patrols for 2021. The patrols are being performed above and beyond the requirement. PM 0972

August 21,2021 was the five year navigable waterway inspection that utilized divers to probe the river bed for depth of cover. PM 0971

10. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 195.412(a) (also presented in: PD.RW)

Question Text Are the ROW conditions acceptable for the type of patrolling used?

Assets Covered 8276

Result Notes Patrols are done in vehicles and on foot. It is a suitable method.

11. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: PD.RW)

Question Text Are line markers placed and maintained as required?

Assets Covered 8276

Result Notes The line is well marked. No issues were noted.

12. Question Result, ID, Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: PD.RW) References

Question Text Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?

Assets Covered 8276

Result Notes PM 972 weekly PM 971 5 year water crossing.

13. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP References 1162, Section 8) (also presented in: PD.RW)

Question Text Does the process address how line markers are to be placed and maintained?

Assets Covered 8276

PD.DP: Damage Prevention

14. Question Result, ID, Sat, PD.DP.ONECALL.P, 195.442(a) (195.442(b))

Question Text Does the process require participation in qualified one-call systems?

Assets Covered 8276

Result Notes Section G 4.A of the O&M Manual

15. Question Result, ID, Sat, PD.DP.PROGRAM.P, 195.442(a) References

Question Text Does the operator have a damage prevention program approved and in place?

Assets Covered 8276

Result Notes 4.B Affected Public, 4.D is the section that discusses contractors and excanvators

16. Question Result, ID, Sat, PD.DP.PUBLICNOTIFY.P, 195.442(a) (195.442(c)(2))

References

Question Text Does the process include public notification requirements?

Assets Covered 8276

Result Notes Section G 4.B The message is in 4.B.1 4.B.2 is identification of the affected public

17. Question Result, ID, Sat, PD.DP.EXCAVATEMARK.P, 195.442(a) (195.442(b), 195.442(c)(4), 195.442(c)(5)) References

Question Text Does the process require marking proposed excavation sites?

Assets Covered 8276

Result Notes G4 contains guidance for all parties. Re reviewed the documentation for the public officials. The message is the same for all parties. The procedure states that when there is a proposed excavation within 15 feet of the line they have someone on site.

18. Question Result, ID, Sat, PD.DP.EXCAVATE.P, 195.442(a) (195.442(c)(6))

Question Text Does the process include inspection of pipelines that could be damaged by excavation activities?

Assets Covered 8276

Result Notes Maintenance Manual in G-1 1.1 (Visual Pipe Inspection) states when or if the pipe is exposed they inspect for damage.

19. Question Result, ID, Sat, PD.DP.TPD.P, 195.442(a) (195.442(b), 195.442(c)(1)) References

> Question Text Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?

Assets Covered 8276

Result Notes The excavator list is maintained by Paradigm. The Paradigm report from 2020 details how they are adding additional databases to their list. Data sources are updated quarterly, tri-annually, or biannually.

20. Question Result, ID, Sat, PD.DP.TPDONECALL.P, 195.442(a) (195.442(b), 195.442(c)(3)) References

Question Text Does the process specify how reports of TPD are checked against One-Call tickets?

Assets Covered 8276

Result Notes Maint Manual C-2 has forms in the Field Investigation Report (Exhibit A) to collect the One-Call Number.

21. Question Result, ID, Sat, PD.DP.ONECALL.O, 195.442(c)(3)

Question Text Observe operator's process for a "One Call" Ticket.

Assets Covered 8276

Result Notes We reviewed several of the tickets from October. The One Call locates go to all inspectors. goes out and locates. If they are very far away from the pipeline they still perform positive response and document.

22. Question Result, ID, Sat, PD.DP.PROGRAM.R, 195.442(a)

Question Text Do records indicate the damage prevention program is being carried out as written?

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Result Notes We reviewed the 2020 PA Effectiveness Report from Paradigm and observed the steps needed to process an One Call ticket.

PD.PA: Public Awareness

23. Question Result, ID, Sat, PD.PA.ASSETS.P, 195.440(b) (API RP 1162, Section 2.7 Step 4)
References

Question Text Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?

Assets Covered 8276

Result Notes PA Program Section 2. (Last 2 sentences)

24. Question Result, ID, Sat, PD.PA.AUDIENCEID.P, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162 References Section 3)

Question Text Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

Assets Covered 8276

Result Notes Section 3.B in the PA Program. MPL has a copy of Paradigm's database.

25. Question Result, ID, Sat, PD.PA.MGMTSUPPORT.P, 195.440(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)
References

Question Text Does the operator's program documentation demonstrate management support?

Assets Covered 8276

Result Notes G-1 Section 1

26. Question Result, ID, Sat, PD.PA.PROGRAM.P, 195.440(a) (195.440(h)) References

Question Text Has the continuing public education (awareness) program been established as required?

Assets Covered 8276

Result Notes Section 2 PA contains this.

27. Question Result, ID, Sat, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162 References Section 3)

Question Text Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?

Assets Covered 8276

Result Notes Section G, 4.B.2

28. Question Result, ID, Sat, PD.PA.MESSAGES.P, 195.440(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 References Section 5)

Question Text Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where hazardous liquid or carbon dioxide is transported?

Assets Covered 8276

Result Notes PA Section 4, 5. They perform an effectiveness review every year and although the manual states they will contact public officials every two years, but they do so every year.

29. Question Result, ID, Sat, PD.PA.SUPPLEMENTAL.P, 195.440(c) (API RP 1162 Section 6.2) References

Question Text Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience along all pipeline systems, as described in API RP 1162?

Assets Covered 8276

Result Notes PA section 10 discusses this. The supplemental enhancements were discussed at the end of this section.

30. Question Result, ID, Sat, PD.PA.EDUCATE.R, 195.440(d) (195.440(f)) References

Question Text Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other

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damage prevention activities; (2) Possible hazards associated with unintended releases from a hazardous liquid or carbon dioxide pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; and (5) Procedures to report such an event?

Assets Covered 8276

Result Notes Section 4 of the PA manual

31. Question Result, ID, Sat, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f))

Question Text Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

Assets Covered 8276

Result Notes Maps are provided in the mailing and by Zipcode.

32. Question Result, ID, Sat, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1) References

Question Text Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1?

Assets Covered 8276

Result Notes Messages are delivered every year to every group.

33. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: EP.ERL)

Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

Assets Covered 8276

Result Notes PM 1813 for PA mailings. Every year they mail to FRs 9/9/19 and 9/6/21. A copy of the mailing was reviewed. The 2021 report was available and I reviewed the brochure for the public officials in the 2020 mailing. I reviewed the postage receipts for the mailings. They have participated in the LEPC in the past. This may change slightly due to Covid.

34. Question Result, ID, Sat, PD.PA.LANGUAGE.P, 195.440(g) (API RP 1162 Section 2.3.1) References

Question Text Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

Assets Covered 8276

Result Notes Section 10. (Supplemental enhancement) The affected public have been given the opportunity to request materials in Spanish.

35. Question Result, ID, Sat, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 Section 2.3.1) References

Question Text Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

Assets Covered 8276

Result Notes Messages available in Spanish, but no known records were requested. The brochure and response card have Spanish text to allow a non-English speaker to request additional materials.

36. Question Result, ID, Sat, PD.PA.EVALPLAN.P, 195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E) References

Question Text Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?

Assets Covered 8276

Result Notes This is in Section 7.B of of the Maintenance Manual has a four year cycle listed as the minimum frequency, but they are performing every year.

37. Question Result, ID, Sat, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3) References

Question Text Has an audit or review of the public awareness program implementation been performed annually since the program was developed?

Assets Covered 8276

Result Notes PM 1814 (Maximo WO) has an annual audit. They showed 2018 through 2020

Report Filters: Results: all

38. Question Result, ID, Sat, PD.PA.AUDITMETHODS.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3) References

Question Text Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of the public awareness program implementation?

Assets Covered 8276

Result Notes Internal assessment plus 3rd party (Paradigm) assessment.

39. Question Result, ID, Sat, PD.PA.PROGRAMIMPROVE.R, 195.440(c) (API RP 1162 Section 8.3)

Question Text Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?

Assets Covered 8276

Result Notes Nick Pellos annual assessment had lessons learned to include outreach for the public not to drive away from a leak.

40. Question Result, ID, Sat, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 Sections 8.4)

Question Text Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?

Assets Covered 8276

Result Notes The paradigm report has some effectiveness evaluation and McChord's evaluation letter stated awareness was about the same.

41. Question Result, ID, Sat, PD.PA.MEASUREOUTREACH.R, 195.440(c) (API RP 1162 Section 8.4.1)

Question Text In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?

Assets Covered 8276

Result Notes They are at 7.08% response compared to the industry average of 1%.

42. Question Result, ID, Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(c) (API RP 1162 Section 8.4.2)

Question Text In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?

Assets Covered 8276

Result Notes Paradigm collects data for that and McChord evaluates the data in their annual review of PA/DP information.

43. Question Result, ID, Sat, PD.PA.MEASUREBEHAVIOR.R, 195.440(c) (API RP 1162 Section 8.4.3)

Question Text In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?

Assets Covered 8276

Result Notes Paradigm collects data for that and McChord evaluates the data in their annual review of PA/DP information. The operator noted that many respondents said they would "get in their car and drive away." This was not the action the operator wants the public to take.

44. Question Result, ID, Sat, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 Section 8.4.4)

Question Text Did the operator attempt to measure bottom-line results of the program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?

Assets Covered 8276

Result Notes IMP Appendix D-1 tracks this information.

45. Question Result, ID, Sat, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)
References

Question Text Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?

Assets Covered 8276

Result Notes Continue to provide information in Spanish if requested. They will evaluate the question about how to properly evacuate.

PD.RW: ROW Markers, Patrols, Monitoring

46. Question Result, ID, Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: MO.RW) References

Question Text Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?

Assets Covered 8276

Result Notes PM 972 weekly PM 971 5 year water crossing.

47. Question Result, ID, Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: MO.RW) References

Question Text Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?

Assets Covered 8276

Result Notes I reviewed a selection of the weekly patrols for 2021. The patrols are being performed above and beyond the requirement. PM 0972

August 21,2021 was the five year navigable waterway inspection that utilized divers to probe the river bed for depth of cover. PM 0971

48. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 195.412(a) (also presented in: MO.RW)

Question Text Are the ROW conditions acceptable for the type of patrolling used?

Assets Covered 8276

Result Notes Patrols are done in vehicles and on foot. It is a suitable method.

49. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: MO.RW)

Question Text Are line markers placed and maintained as required?

Assets Covered 8276

Result Notes The line is well marked. No issues were noted.

50. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP References 1162, Section 8) (also presented in: MO.RW)

Question Text Does the process address how line markers are to be placed and maintained?

Assets Covered 8276

Result Notes D-2 4.1

51. Question Result, ID, Sat, PD.RW.INFORMATION.P, 195.402(c)(3) (195.452(f)(3), 195.452(g)) References

Question Text Does the process require damage prevention information to be gathered and recorded during pipeline patrols and surveillance and then analyzed?

Assets Covered 8276

Result Notes Maint Manual D-2 Scheduled Inspections and tests (procedure) and PM0972 (Weekly patrol)

52. Question Result, ID, Sat, PD.RW.INFORMATION.R, 195.404(c) (195.402(c)(3), 195.452(f)(3), 195.452(g))
References

Question Text Do records show damage prevention information being gathered and recorded during pipeline patrols and surveillance and then analyzed is available for review?

Assets Covered 8276

Result Notes IMP Appendix D-1

PD.SN: Facilities Signage and Security

53. Question Result, ID, Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: FS.FG) References

Question Text Are facilities adequately protected from vandalism and unauthorized entry?

Assets Covered 8276

Result Notes All facilities were protected using all means necessary from vandalism and unauthorized entry using gates, fences, and lock/chain assemblies.

54. Question Result, ID, Sat, FS.FG.IGNITION.O, 195.438 (also presented in: FS.FG)

References

Question Text Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?

Assets Covered 8276

Result Notes There is adequate signage and no smoking is allowed inside the facility. Open flames are prohibited as

55. Question Result, ID, Sat, FS.FG.IGNITION.R, 195.404(c) (195.438) (also presented in: FS.FG)

Question Text Do records show precautions taken to prevent ignition sources in areas with a potential for accumulating flammable vapors or leaking hazardous liquids?

Assets Covered 8276

Result Notes The proc is in Section I of the maintenance manual.

56. Question Result, ID, Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: FS.FG)

Question Text Are there operator signs around each pumping station, breakout tank area, and other applicable facilities? Assets Covered 8276

Result Notes There is signage within the facility and at all above ground valve stations with the company name and emergency number.

57. Question Result, ID, Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: FS.FG) References

> Question Text Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?

Assets Covered 8276

Result Notes There is only smoking in designated areas only. No BO tanks

58. Question Result, ID, Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: FS.FG) References

Question Text Does the process require facilities to be protected from vandalism and unauthorized entry?

Assets Covered 8276

Result Notes D-10 Maintenance Manual.

59. Question Result, ID, Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: FS.FG)

Question Text Does the process require operator signs to be posted around each pump station and breakout tank area?

Assets Covered 8276

Result Notes D-2 in the Maintenance Manual

PD.SP: Special Permits

60. Question Result, ID, NA, PD.SP.REPAIR.P, 190.341(d)(2) References

> Question Text If a pipeline is operated under a special permit have processes been modified to incorporate the requirements of the permit for required repairs?

Assets Covered 8276

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

61. Question Result, ID, NA, PD.SP.REPAIR.R, 190.341(d)(2)

Question Text If a pipeline is operated under a special permit, do records indicate that required repairs were performed? Assets Covered 8276

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

62. Question Result, ID, NA, PD.SP.REQUIREMENT.O, 190.341(d)(2) References

Question Text If a pipeline is operated under a special permit, verify that the requirements have been implemented. Assets Covered 8276

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

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.

8276 McChord Public Awareness Report Filters: Results: all

Form A- Annual Review 8277

UTC Standard Annual Review Inspection Report Intrastate Operators FORM A: Annual Review

Inspector and Operator Information

Inspection ID Inspection Link Inspector - Lead Inspector - Assist 8277 David Cullom Records Location - City & State Operator McChord Pipeline Company McChord Pipeline Company Tacoma Inspection Start Date Inspection Exit Interview Date Engineer Submit Date 11-02-2021 11-04-2021

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

*Inspection Scope and Summary

This Annual Review was conducted in conjunction with our Standard Liquid and our Public Awareness Program inspection.

*Facilities visited and Total AFOD

This Annual Review consisted of (1) remote field day via MS Teams.

* Summary of Significant Findings

There were no Areas of Concern or Probable Violations noted during this inspection.

* Primary Operator contacts and/or participants

First Name Last Name Phone Email Organization Position Joel Roppo (253) 383-1651 jroppo@parpacific.com Par Pacific Chief Engineer Williamson (253) 383-1651 jwilliamson@parpacific.com Par Pacific Senior Inspector

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
14	1,3,6,9,10,17,18,24,26,27,31,32,35,37,	0	
Unsatisfactory Responses	Unsatisfactory List		
0			
Area of Concern Responses	Area of Concern List		
0			
Not Applicable Responses	Not Applicable List		
26	4,5,7,8,11,12,13,14,15,16,19,20,21,22,23,25,28,29,30,3	8,39,40,41,42,43,44	
Yes Responses	Yes List	No Responses	No List
2	34,36,	0	
Not Checked / Evaluated Responses	Not Checked / Evaluated List		
0			

^{**}If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the "SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
No crew inspections found						

Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
No facility	inspections found					

Scheduled Inspection History

Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
McChord Pipe	line Company (16 Inspe	ections)	·					
2021	McChord Pipeline Company	McChord Pipeline Company	8275	Standard Comprehensive - HL	In the Workflow		11-04-2024	Documents
2021	McChord Pipeline Company	McChord Pipeline Company	8276	PA - Public Awareness	In the Workflow		11-04-2025	Documents
2021	McChord Pipeline Company	McChord Pipeline Company	8277	Standard - Annual Review	Complete	11-30-2021	11-04-2022	Documents
2020	McChord Pipeline Company	McChord Pipeline Company	8016	LIMP - Liquid Transmission Integrity Management	Complete	06-12-2020	06-04-2023	Documents
2020	McChord Pipeline Company	McChord Pipeline Company	8017	DA - Drug & Alcohol	Complete	02-27-2020	02-25-2024	Documents
2020	McChord Pipeline Company	McChord Pipeline Company	8018	Standard - Annual Review	Complete	06-12-2020	06-04-2021	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7846	OQ - Operator Qualification	Complete	12-02-2019	11-05-2023	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7847	CRM - LIQUID	Complete	12-20-2019	11-06-2023	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7848	Standard - Annual Review	Complete	12-20-2019	11-06-2020	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7924	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	08-12-2019	07-22-2023	Documents

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
2018	McChord Pipeline Company	McChord Pipeline Company	7567	Standard Comprehensive - HL	Complete	10-26-2018	10-10-2021	Documents
2017	McChord Pipeline Company	McChord Pipeline Company	7236	LIMP - Liquid Transmission Integrity Management	Complete	10-12-2017	09-26-2020	Documents
2017	McChord Pipeline Company	McChord Pipeline Company	7474	PA - Public Awareness	Complete	12-04-2017	10-31-2021	Documents
2017	McChord Pipeline Company	McChord Pipeline Company	7508	Incident Investigation	Complete	10-20-2017	10-11-2017	Documents
2016	McChord Pipeline Company	McChord Pipeline Company	6754	Standard Comprehensive - HL	Complete	10-19-2016	10-11-2019	Documents
2015	McChord Pipeline Company	McChord Pipeline Company	6208	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	08-27-2015	08-11-2019	Documents

GAS System Operations History

0, 10 0 0	tom operation into	J. J					
Annual Report -	Miles of Main				Annual Report GA	S Transmission Miles	
Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length	YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
No reports four	nd				No reports found		

Annual Report - Leaks

Year	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR						
No reports foun	No reports found										

Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:				
No reports four	lo reports found										

HL System Operations History

HL Annual Report - Miles of Pipe by Decade

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre- 20s	1920- 1929	1930- 1939	1940- 1949	1950- 1959	1960- 1969	1970- 1979	1980- 1989	1990- 1999	200
2020	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)	14.25							13.25			1	
2019	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)	14.25							13.25			1	
2018	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)	14.25							13.25			1	
2017	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)	14.25							13.25			1	
2016	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)	14.25							13.25			1	
2015	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)	14							13			1	

HL Annual Report - HL Miles / HCAs

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
2020	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	14.25	14.25				
2019	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	14.25	14.25				
2018	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	14.25	14.25				
2017	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	14.25	14.25				
2016	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	14.25	14.25				
2015	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)		14				

HI Annual Report - Breakout Tanks

L Annual R	Report - Breakou	rt Tanks					
YEAR	Operator	Commodity Group	Crude Oil #5	Refined (non HVL) #5	HVL #5	CO2 #5	F Gra
McChor	rd Pipeline C	ompany (6 Rep	orts)				
2020	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	0	0	0	0	
2019	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	0	0	0	0	
2018	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	0	0	0	0	
2017	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	0	0	0	0	
2016	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	0	0	0	0	
2015	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)	0	0	0	0	

ANNUAL REPORT: ACCURACY/TRENDS

Question #1. 1. Result Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe. Satisfactory

1. Notes

Note that one mile of the system was replaced with SMLS (Seamless) pipe in the 1990's due to a reroute on Waller Rd and that is the reason for the mileage differences.

Access to Complete Distribution Annual Report

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length	YEAR	Operator
No reports	No reports	found				

Access to Complete Transmission Annual Report Access to Complete Hazardous Liquid Annual Report Total Total

Miles

Commodity Group

YEAR	Operator	Commodity Group
	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)
	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)
	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)

YEAR	Operator	Commodity Group
2017	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)
2016	McChord Pipeline Company	Refined and/or Petroleum (non-HVL)
2015	McChord Pipeline Company	Refined and/or Petroleum (non- HVL)

DAMAGE PREVENTION

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services
														·	

No damageses found

DIDT	 	mism	 £	

Damage Cause Number of Reports No records found

DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

 ${\bf Submit Company ID-UTC final Name}$ Number of Reports No records found

Question #2.

Review the following damage prevention items

Q2. Is the damage prevention information in the annual report complete?

Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

Q2.j. Are mapping corrections timely and according to written procedures?

Q2.g. What is the number of damages resulting from mismarks?

N/A - No mapping errors have been noted that require corrections

Q2.b. Is the annual report damages root cause information complete and accurate?

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?

Q2.h. What is the number of damages resulting from not locating within the time requirements?

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?

Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practic sufficient" category?

I was unable to locate a process for this in the PA program.

Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies

Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in exca damage?

N/A

Q2.L. Is the operator appropriately focusing damage prevention education and training to ad causes of excavation damage?

Excavation damage has been minimal compared to natural gas LDCs. The last excavation dam due to an HDD and improper excavation practices.

2. Notes

0

NPMS SUBMISSIONS/CHANGES

Question #3. 3. Result

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

Yes. This was documented in the standard inspection in IA

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4 Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Results Not Applicable

None noted in the Commissions database. The operator said there were no incidents.

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
3199	McChord Pipeline Company	McChord Pipeline Company	1,186,063	Dennis Ritter	08-02-2017 12:12 PM	Intersection of 100th St and A St			Federal

Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

5. Result Not Applicable

5. Notes

None noted in the Commissions database. The operator said there were no incidents.

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

NotificationID Inspector Company Street Address of event/incident Date & Time of Incident Is 30-Day Reporting Level Report Received?

6. Result Satisfactory

No incident notifications found

6. Notes

None noted in the Commissions database. The operator said there were no incidents.

Question #7

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

Report Date NotificationID Company Safety-Related SafetyRelatedConditionChoices Reportable? Date & Time of Incident Company Notified Date Condition

7. Result Not Applicable

No incident notifications found

7. Notes None

Question #8.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

8. Result Not Applicable

8. Notes

None

O&M & EMERGENCY PROGRAMS

Question #9.

Operator Manuals on Sharepoint 9. Result Is the O&M Manual up to date and were changes made in the previous year? Satisfactory

9. Notes

 $We currently have manuals from 2017 and 2018. \ During the inspection any changes since those revisions will be reviewed.$

Question #10 10 Result If changes to the O&M were made, are changes acceptable? Satisfactory

There were minor changes mostly for updated contact information.

Question #11.

Were emergency plans changed during the previous year?

11. Result Not Applicable

11. Notes

No EP&P changes made.

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Not Applicable

12. Notes

INTEGRITY MANAGEMENT PROGRAMS

Question #15	i S. Resuit
Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?	Not Applicable
13. Notes	

No changes

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)? Not Applicable

14. Result

14. Notes No changes

Question #15 15. Result Not Applicable

Are IMP program changes acceptable? 15 Notes

Question #16

16. Results Was appropriate assessment/repair work conducted during the past year? (monitor progress of IMP activities) Not Applicable

No repair work since 2019.

No changes

Question #17

17. Results Does the operator's HCA location data correspond to the positional data located in UTC GIS? Satisfactory

17. Notes

The operator's system is in a developed area so there are some, but not major changes. The system is all "Could Affect" HCA

Question #18 18. Results What assessment work is planned for the upcoming year? Satisfactory

18. Notes

No ILI runs until 2024 and no outstanding anomalies.

19. Results Not Applicable Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

19. Notes This is a liquid operator. This does not apply.

Question #20 20. Results Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section) Not Applicable

20. Notes

This is a liquid operator. This does not apply. Question #21

21. Results Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?Not Applicable

21. Notes No plastic pipe, or DIMP plan. This is a hazardous liquid operator.

22. Results Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities) Not Applicable

22. Notes This is a hazardous liquid operator. No DIMP Plan is required.

Question #23 23. Results What DIMP remediation work is anticipated for upcoming year? Not Applicable

23. Notes This is a hazardous liquid operator. No DIMP Plan is required.

OQ PROGRAM

Question #24	24. Results
Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.	Satisfactory

24. Notes No changes to the OQ program plan.

Question #25 25. Results Are the OQ plan updates satisfactory? Not Applicable

25. Notes No changes to the OQ program plan.

26. Results

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan? Satisfactory

26. Notes

OQ records reviewed for MPL pipleine staff and contractors for ILI work performed in 2019 and PM tasks

PUBLIC AWARENESS PROGRAM

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year? Satisfactory

27. Results

33. Results

27. Notes

The PA plan has not had changes other than contact information.

 Question #28
 28. Results

 Are changes to the PA program satisfactory?
 Not Applicable

28. Notes

The PA plan has not had changes other than contact information.

CONTROL ROOM PROGRAM

Question #29 29. Results

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year? Not Applicable

29. Notes

No changes to the CRM program have occurred.

 Question #30
 30. Results

 Are the CRM program changes satisfactory?
 Not Applicable

30. Notes

No changes to the CRM program have occurred.

SAFETY MANAGEMENT SYSTEM API 1173

Question #31 31. Results

Is the operator developing and implementing an API 1173 Safety Management System? Satisfactory $\frac{1}{2}$

31. Notes

The operator is not developing a SMS, but is under PSM.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

 Question #32
 32. Results

 Are inspection units broken down appropriately? Do you recommend any changes to inspection units?
 Satisfactory

32. Notes

This unit is of suitable size. The system is only 14.25 miles long.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	UTC Unit ID	UTC Operator ID
McChord Pipeline Con	npany (1 Unit)				
McChord Pipeline Company	Hazardous Liquid	Intrastate	Liquid	72	107

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

Q33.A Pipeline Purpose and Reliability; Q33.B Damage Prevention; Q33.C Pipe Location Information; Q33.D How to get additional information; Q33.E National Pipeline Mapping System; Q33.F On Call Requirements; Q33.G Potential Hazards; Q33.H Prevention Measures; Q33.I Leaved Tolamage Recognition; Q33.J ROW Encroachment; Q33.K Pipeline Location Information; Q33.L Integrity Management Programs; Q33.M Emergency Preparedness

33. Notes

This information was reviewed approximatly one year ago during my last Annual Review.

Pipeline purpose and reliability http://www.mcchordpipeline.com/ Reconfirmed in 2021

Damage Prevention http://www.mcchordpipeline.com/damageprev.html

Pipe location information http://www.mcchordpipeline.com/pipelinegeninfo.html

How to get additional information $\underline{\text{http://www.mcchordpipeline.com/contact.html}} \text{ and }$

http://www.mcchordpipeline.com/pipelinegeninfo.html (at the bottom of page)

National Pipeline Mapping system http://www.mcchordpipeline.com/map.html

One call requirements http://www.mcchordpipeline.com/damageprev.html

Potential Hazards http://www.mcchordpipeline.com/about.html (on right side bar of every page)

Prevention measures http://www.mcchordpipeline.com/contexcainfo.html

Leak/ damage recognitionhttp://www.mcchordpipeline.com/about.html (on right side bar of every page)

ROW encroachment http://www.mcchordpipeline.com/damageprev.html (3/4 the way down in the text)

Pipeline location information http://www.mcchordpipeline.com/pdfs/McChord-Pipeline Map.pdf

Integrity management programs http://www.mcchordpipeline.com/integmgmt.html

Emergency preparedness http://www.mcchordpipeline.com/emerresp.html

Notes - 100% of the items were found on the McChord Pipeline website

ADVISORY BULLETIN REVIEW

Question #34

 $Is there \ potential \ for \ damage \ to \ the \ operator's \ pipeline \ facilities \ caused \ by \ flooding, \ river \ scour, \ or \ channel \ migration?$

ADB 2019-01 ADB 2019-01 Flood Mit

ADB 2019-01 Flood Mitigation

24 Notes

The operator performs a river depth of cover survey at a suitable frequency to track any potential river scour.

34. Results

YES

_	uestion	#25
	uestion	#33

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any

ADB 2019-01

35. Results Satisfactory

ADB 2019-01: Flood Mitigation

35. Notes

We reviewed the river study that was recently performed.

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards 36. Notes

36. Results YES

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results

Satisfactory

Landslides are not much of a concern due to the topography. The Nisqually quake had no effect on the safe operation of this line due to liquefaction. During an event, the CPM leak detection system would be used to look for any indications requiring an immediate shutdown and isolation of the system.

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

38. Results Not Applicable

38. Notes

No assets of this type

ADB 2020-01 Inside Meter Sets

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-01157 Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01 39. Results

ADB 2020-01 Inside Meter Sets

Not Applicable

39. Notes

No assets of this type

Question #40

Does the operator have a detailed record of locations for all indoor meter sets/regulators within their system?

40. Results ADB 2020-01 Not Applicable

ADB 2020-01 Inside Meter Sets

40. Notes

No assets of this type

Question #41

Does the operator have any low pressure systems? ADB 2020-02

41. Results ADB 2020-02 Low Pressure Systems Not Applicable

41. Notes

No assets of this type

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02 42. Results

ADB 2020-02 Low Pressure Systems Not Applicable

42 Notes

No assets of this type

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identity system threats that could result in a common failure mode? How is the operator mitigating risk in their low presure system?

ADB 2020-02 43. Results

ADB 2020-02 Low Pressure Systems Not Applicable

43. Notes No assets of this type

Question #44 Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02 44. Results

ADB 2020-02 Low Pressure Systems Not Applicable

44. Notes No assets of this type

SUMMARY OF REQUIRED COMMENTS