Sent via email

November 30, 2021

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


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
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**

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Phone</th>
<th>Email</th>
<th>Organization</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joel</td>
<td>Roppo</td>
<td>(253) 383-1651</td>
<td><a href="mailto:jroppo@parpacific.com">jroppo@parpacific.com</a></td>
<td>Par Pacific</td>
<td>Chief Engineer</td>
</tr>
<tr>
<td>John</td>
<td>Williamson</td>
<td>(253) 383-1651</td>
<td><a href="mailto:jwilliamson@parpacific.com">jwilliamson@parpacific.com</a></td>
<td>Par Pacific</td>
<td>Senior Inspector</td>
</tr>
</tbody>
</table>

**Instructions and Ratings Definitions**

<table>
<thead>
<tr>
<th>INSTRUCTIONS</th>
<th>INSPECTION RESULTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>S - Satisfactory</td>
<td>Unsatisfactory</td>
</tr>
<tr>
<td>U - Unsatisfactory</td>
<td>Unsatisfactory</td>
</tr>
<tr>
<td>Area Of Concern</td>
<td>Area of Concern</td>
</tr>
<tr>
<td>N/A- Not Applicable (does not apply in this inspection)</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>N/C - Not Checked/Evaluated (was not inspected during this inspection)</td>
<td>Not checked / Evaluated</td>
</tr>
</tbody>
</table>

**NOTES**

*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.
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?

<table>
<thead>
<tr>
<th>Q1 Reference</th>
<th>Q1 Result</th>
<th>Q1 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>RCW 81.88.080</td>
<td>Satisfactory</td>
<td>The mapping information has been provided to the UTC.</td>
</tr>
</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>Q2 Reference</th>
<th>Q2 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-600</td>
<td>This was verified and was complete.</td>
</tr>
</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>Q3 Reference</th>
<th>Q3 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-600</td>
<td>The maps and records were sufficient.</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Q4 Reference</th>
<th>Q4 Result</th>
<th>Q4 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-630(1)</td>
<td>Satisfactory</td>
<td>No reportable incidents since 2017.</td>
</tr>
</tbody>
</table>

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)

<table>
<thead>
<tr>
<th>Q5 Reference</th>
<th>Q5 Result</th>
<th>Q5 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-610</td>
<td>Not Applicable</td>
<td>This event or condition has not occurred during this inspection time period.</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Q6 Reference</th>
<th>Q6 Result</th>
<th>Q6 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-630(2)</td>
<td>Not Applicable</td>
<td>This event or condition has not occurred during this inspection time period.</td>
</tr>
</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>Q7 Reference</th>
<th>Q7 Result</th>
<th>Q7 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-630(3)</td>
<td>Not Applicable</td>
<td>This event or condition has not occurred during this inspection time period.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Q8 Reference</th>
<th>Q8 Result</th>
<th>Q8 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-650</td>
<td>Satisfactory</td>
<td>This has been submitted.</td>
</tr>
</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>Q9 Reference</th>
<th>Q9 Result</th>
<th>Q9 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-630(4)</td>
<td>Not Applicable</td>
<td>No reportable incidents since 2017</td>
</tr>
</tbody>
</table>
### Question 10

**Question:** 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.

<table>
<thead>
<tr>
<th>Q10 Reference - 1</th>
<th>Q10 Reference - 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>RCW 19.122</td>
<td>WAC 480-75-630(5)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q10 Result</th>
<th>Q10 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not Applicable</td>
<td>No reportable incidents since 2017</td>
</tr>
</tbody>
</table>

### Question 11

**Question:** 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.

<table>
<thead>
<tr>
<th>Q11 Reference - 1</th>
<th>Q11 Reference - 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>RCW 19.122</td>
<td>WAC 480-75-630(6)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q11 Result</th>
<th>Q11 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not Applicable</td>
<td>No reportable incidents since 2017</td>
</tr>
</tbody>
</table>

### Question 12

**Question:** 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?

<table>
<thead>
<tr>
<th>Q12 Reference</th>
<th>Q12 Result</th>
<th>Q12 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>PHMSA State Program Question</td>
<td>Not Applicable</td>
<td>Locates are performed in-house.</td>
</tr>
</tbody>
</table>

### Question 13

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

<table>
<thead>
<tr>
<th>Q13 Reference</th>
<th>Q13 Result</th>
<th>Q13 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-200</td>
<td>Not Applicable</td>
<td>Locates are performed in-house.</td>
</tr>
</tbody>
</table>

### Question 14

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

<table>
<thead>
<tr>
<th>Q14 Reference</th>
<th>Q14 Result</th>
<th>Q14 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-200</td>
<td>Not Applicable</td>
<td>Locates are performed in-house.</td>
</tr>
</tbody>
</table>

### Question 15

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

<table>
<thead>
<tr>
<th>Q15 Reference</th>
<th>Q15 Result</th>
<th>Q15 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-200</td>
<td>Satisfactory</td>
<td>There have been no changes to methods used to perform locates, but MPL locating have attended Staking University.</td>
</tr>
</tbody>
</table>

### Question 16

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

<table>
<thead>
<tr>
<th>Q16 Reference</th>
<th>Q16 Result</th>
<th>Q16 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>RCW 19.122.035</td>
<td>Satisfactory</td>
<td>We reviewed locates for October and they are well documented with photos. There were no time exceedances noted</td>
</tr>
</tbody>
</table>

### Question 17

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

<table>
<thead>
<tr>
<th>Q17 Reference</th>
<th>Q17 Result</th>
<th>Q17 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-200</td>
<td>Satisfactory</td>
<td>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.</td>
</tr>
</tbody>
</table>

### OPERATIONS & MAINTENANCE RECORDS

### Question 18

**Question:** 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?

<table>
<thead>
<tr>
<th>Q18 Reference</th>
<th>Q18 Result</th>
<th>Q18 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAC 480-75-620</td>
<td>Not Applicable</td>
<td>No MOP changes. This event or condition has not occurred during this inspection time period.</td>
</tr>
</tbody>
</table>

### Question 19

**Question:** (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
<table>
<thead>
<tr>
<th>Question</th>
<th>Reference</th>
<th>Result</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Question 20</td>
<td>WAC 480-75-390</td>
<td>Satisfactory</td>
<td>The procedure is in E-8 (9. Testing) MPL has the calibration for the holiday detector that Michaels used for the 2019 ILI dig/coating repair.</td>
</tr>
<tr>
<td>Question 21</td>
<td>WAC 480-75-320</td>
<td>Satisfactory</td>
<td>I reviewed the surge analysis done by Veco Engineering August 20, 1999 in previous inspection and the operator produced a copy during this inspection.</td>
</tr>
<tr>
<td>Question 22</td>
<td>WAC 480-75-330</td>
<td>Not Applicable</td>
<td>No BOTs</td>
</tr>
<tr>
<td>Question 23</td>
<td>WAC 480-75-390</td>
<td>Satisfactory</td>
<td>They have not installed any new rapid shutdown valves. The 2017 incident demonstrated the shutdown and isolation response times.</td>
</tr>
<tr>
<td>Question 24</td>
<td>WAC 480-75-410</td>
<td>Satisfactory</td>
<td>The procedure is in E-8 (9. Testing) MPL has the calibration for the holiday detector that Michaels used for the 2019 ILI dig/coating repair.</td>
</tr>
<tr>
<td>Question 25</td>
<td>WAC 480-75-420</td>
<td>Not Applicable</td>
<td>No hydrostatic tests since the last standard comprehensive inspection.</td>
</tr>
<tr>
<td>Question 26</td>
<td>WAC 480-75-460</td>
<td>Not Applicable</td>
<td>None since the last standard inspection.</td>
</tr>
<tr>
<td>Question 27</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**CORROSION CONTROL RECORDS**

<table>
<thead>
<tr>
<th>Question 27</th>
<th>Q27 Result</th>
<th>Q27 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-500</td>
<td>Not Applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The pipeline has not been moved or lowered since last inspection.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 28</th>
<th>Q28 Result</th>
<th>Q28 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-550</td>
<td>Satisfactory</td>
</tr>
<tr>
<td></td>
<td></td>
<td>There have been no class location changes.</td>
</tr>
</tbody>
</table>

**DESIGN/CONSTRUCTION RECORDS**

<table>
<thead>
<tr>
<th>Question 29</th>
<th>Q29 Result</th>
<th>Q29 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-340</td>
<td>Satisfactory</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Locations were field verified and tested.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 30</th>
<th>Q30 Result</th>
<th>Q30 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-510</td>
<td>Not Applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No low CP readings for 2019-2021.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 31</th>
<th>Q31 Result</th>
<th>Q31 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-520</td>
<td>Satisfactory</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The only pipe exposed since the last standard inspection were the ILI digs in 2019.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 32</th>
<th>Q32 Result</th>
<th>Q32 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-350</td>
<td>Not Applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No new pipeline construction.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 33</th>
<th>Q33 Result</th>
<th>Q33 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-380</td>
<td>Not Applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No new pump station construction.</td>
</tr>
</tbody>
</table>

**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**

<table>
<thead>
<tr>
<th>Question 34</th>
<th>Q34 Result</th>
<th>Q34 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference</td>
<td>WAC 480-75-540</td>
<td>Satisfactory</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Markers are suitable.</td>
</tr>
</tbody>
</table>

<p>| Question 35 | Q35 | |
|-------------|-----|</p>
<table>
<thead>
<tr>
<th>Question 35</th>
<th>Q35 Reference</th>
<th>Q35 Result</th>
<th>Q35 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are pressure relief devices set at or below MOP?</td>
<td>WAC 480-75-320</td>
<td>Satisfactory</td>
<td>These were verified and are in the main IA inspection notes for inspection 8275.</td>
</tr>
</tbody>
</table>

**Question 36**

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

<table>
<thead>
<tr>
<th>Question 36</th>
<th>Q36 Reference</th>
<th>Q36 Result</th>
<th>Q36 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>WAC 480-75-300</td>
<td>Satisfactory</td>
<td>This has been verified and demonstrated in operation when the line was damaged in 2017.</td>
</tr>
</tbody>
</table>

**Question 37**

Do Breakout Tanks have independent overfill alarms?

<table>
<thead>
<tr>
<th>Question 37</th>
<th>Q37 Reference</th>
<th>Q37 Result</th>
<th>Q37 Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>WAC 480-75-330</td>
<td>Not Applicable</td>
<td>No BOTs</td>
</tr>
</tbody>
</table>

**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
Operator(s) MCCHORD PIPELINE CO. (31049)
Lead David Cullom
Observer(s) Scott Rukke, Dennis Ritter, Lex Vinsel,
Anthony Dorrrough, Deborah Becker,
Derek Norwood, Scott Anderson,
Darren Tinnerstet, Rell Koizumi
Supervisor Joe Subsits
Director Sean Mayo

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

Findings

There were no probable violations or areas of concern.

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Company Contacts

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Phone</th>
<th>Email</th>
<th>Organization</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joel</td>
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<td>Par Pacific</td>
<td>Senior Inspector</td>
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Scope (Assets)

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<th>Asset IDs</th>
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<th>Required</th>
<th>Total Inspected</th>
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<tr>
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<td>8275</td>
<td>unit</td>
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<td>Pump Stations, Offshore, GOM, HVL, CO2, Biofuels, Reg Rural Gather, Rural Low Stress, Abandoned</td>
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8275 McChord Standard Comprehensive
1. Percent completion excludes unanswered questions planned as “always observe”.

### Plans

<table>
<thead>
<tr>
<th>Plan # Assets</th>
<th>Focus Directives</th>
<th>Involved Groups/Subgroups</th>
<th>Qst Type(s)</th>
<th>Extent Notes</th>
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<tr>
<td>1. 8275</td>
<td>Field Observations Review, BO Tank Inspection, Baseline Records (Form 3), Baseline Pipeline Field Inspection (Form 3)</td>
<td>AR, CR, DC, TDC, EP, FS, IM, MO, PD, P, R, O, S</td>
<td>Detail</td>
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<td>RPT, SRN, TD, TQ, GENERIC</td>
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### Plan Implementations

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<td>11/05/2021</td>
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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

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<tr>
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<td>COMPLETED</td>
<td>11/05/2021</td>
<td>Standard Comp</td>
<td>8275</td>
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### 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, References: 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, References: Sat, CR.LD.EVAL.R, 195.444(a) (195.444(b), 195.134(a), 195.134(b),)

   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?
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, References
   Sat, CR.LD.LDSYSTEM.R, 195.404(c) (195.134(b), 195.444(b))
   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, References
   Sat, CR.LD.LDTRAINING.R, 195.507(a) (195.507(b))
   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, References
   Sat, CR.LD.ALARMDISPLAY.O, 195.444(b)
   Question Text Are the Leak Detection alarms adequate?
   Assets Covered 8275

7. Question Result, ID, References
   Sat, CR.LD.LDSTEST.R, 195.134(b) (195.444(b))
   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, References
   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, References
    Sat, DC.CO.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))
    Question Text Are valves located as specified by 195.260?
    Assets Covered 8275
11. Question Result, ID, References: 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, References: Sat, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a)) (also presented in: 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, References: Sat, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a)) (also presented in: 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, References: Sat, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a)) (also presented in: TDC.WELDINSP)
Question Text: Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?
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, References: Sat, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME 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, References: Sat, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b) (also presented in: TDC.WELDPROCEDURE)
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.

DC.MO: Maintenance and Operations

18. Question  
Result, ID, References  Sat, DC.MO.SAFETY.P, 195.402(a) (195.422(a), 195.402(c)(14))  
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, References  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, References  NA, DC.PT.PRESSTEST.O, 195.302(a) (195.304, 195.305(a), 195.306(a), 195.306(b), 195.306(c), 195.306(d), 195.307(a), 195.307(b), 195.307(c), 195.307(d), 195.308)  
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, References  Sat, DC.PT.PRESSTESTTIEIN.R, 195.308  
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, References  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, References  NA, TDC.TK650REGS.BOSPEC.P, 195.132(b)(3) (API Std 650)  
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, References  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.
25. Question Result, ID, References 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, References 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, References 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, References NA, TDC.TK650REGS.REPAIRLEAKTEST.P, 195.307(d) (195.310(a), 195.310(b), API 653)
   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, References 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, References 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, References NA, TDC.TK650REGS.BOIMPOUND.P, 195.264(a) (195.264(b), 195.264(c), 195.264(d), 195.264(e))
   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, References Sat, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b) (also presented in: DC.WELDPROCEDURE)
   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, References**: Sat, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME 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.

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

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

35. **Question Result, ID, References**: Sat, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a)) (also presented in: 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, References**: Sat, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a)) (also presented in: DC.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.

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

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

**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, References**: 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.

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**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, References: Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also 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 receipts for the mailings.

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

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, References: Sat, EP.ERL.AUTHORITIES.R, 195.402(a) (195.402(e)(7))

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, References: Sat, EP.ERL.POSTEVNTREVIEW.R, 195.402(a) (195.402(e)(7), 195.402(e)(9))

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, References: Sat, EP.ETR.TRAINING.R, 195.403(a)

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

Assets Covered: 8275


45. Question Result, ID, References: 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.

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

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...
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, References
NA, EP.ETR.TRAININGSUPERVISE.O, 195.403(c)

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, References
NA, FS.TSAPIINSPECT.BOINSPECTION.R, 195.404(c)(3) (195.432(a))

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, References
NA, FS.TSAPIINSPECT.BOINSRVCINSP.P, 195.402(c)(3) (195.432(b))

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, References
NA, FS.TSAPIINSPECT.BOINSRVCINSP.R, 195.404(c)(3) (195.432(b))

Question Text Do records document that steel atmospheric or low pressure breakout tanks have received routine in-service 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, References
NA, FS.TSAPIINSPECT.BOEXTINS.P, 195.402(c)(3) (195.432(b))

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, References
NA, FS.TSAPIINSPECT.BOEXTINS.R, 195.404(c)(3) (195.432(b))

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, References
NA, FS.TSAPIINSPECT.BOEXTUTINS.P, 195.402(c)(3) (195.432(b))

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, References
NA, FS.TSAPIINSPECT.BOEXTUTINS.R, 195.404(c)(3) (195.432(b))

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
62. Question Result, ID, References
Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: PD.SN)
Question Text Are facilities adequately protected from vandalism and unauthorized entry?
Assets Covered 8275
Result Notes The facilities are well secured.

FS.FG: Facilities General

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

67. Question Result, ID, References Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: PD.SN)
   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, References 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, References 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, References 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, References Sat, FS.FG.FIREPROT.O, 195.430(a) (195.430(b), 195.430(c), 195.262(e))
   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, References Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: MO.LMOPP)
   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
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, References Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: MO.LMOPP)
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.LAUNCHRECVRLELIEF.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, References 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, References NA, FS.TS.OVERFILLBO.R, 195.404(c)(3) (195.428(a), 195.428(c), 195.428(d))
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, References 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, References NA, FS.TS.BOINSPECTION.O, 195.432(a) (195.432(b), 195.432(c), 195.401(b)) (also presented in: 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, References 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, References NA, FS.TS.IGNITIONBO.R, 195.404(c) (195.405(a))
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.
81. Question Result, ID, References
   NA, FS.TS.FLOATINGROOF.P, 195.402(c)(3) (195.405(b))
   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, References
   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, References
   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, References
   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, References
   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, References
   NA, FS.TS.PRESSTESTBO.R, 195.310(a) (195.310(b), 195.307)
   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, References
   Sat, MO.LM.VALVEMAILT.R, 195.404(c) (195.420(a), 195.420(b)) (also presented in: MO.LM)
   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, References
   Sat, MO.LM.VALVEMAILT.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, References: 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.

   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, References: Sat, MO.LO.OMHISTORY.R, 195.404(a) (195.404(c), 195.9, 195.402(c)(1))
   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, References: Sat, MO.LO.OMEFFECTREVIEW.R, 195.402(a) (195.402(c)(13), 195.404(a))
   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

   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, References: Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: FS.PS)
   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, References: Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: FS.PS)
   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, References
   Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: PD.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.

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

98. Question Result, ID, References
   Sat, MO.ABNORMAL.ABNORMAL.R, 195.404(b) (195.402(d)(1))
   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, References
   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 8275
   Result Notes Patrons are done by walking and driving. The ROW is suitable for this method.

MO.LM: Liquid Pipeline Maintenance

100. Question Result, ID, References
    Sat, MO.LM.VALVEMAIN.T.R, 195.404(c) (195.420(a), 195.420(b)) (also presented in: FS.VA)
    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, References
     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 8275
     Result Notes The line is well marked.

MO.LM: Liquid Pipeline Maintenance

102. Question Result, ID, References
     Sat, MO.LM.VALVEMAIN.T.O, 195.420(a) (195.420(c)) (also presented in: FS.VA)
     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
103. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALREVIEW.R, 195.404(b) (195.402(d)(5))
    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, References 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, References NA, MO.EW.EXTWEATHERINSPIMPL.R, 195.404(c) (195.414(a), 195.414(b), 195.414(c), 195.414(d))
    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, References 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, References 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, References NC, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162 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, References NC, PD.PA.EDUCATE.R, 195.440(d) (195.440(f))
    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, References NC, 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 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, References NC, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1)

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, References Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also 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 receipts for the mailings.

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

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

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, References 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, References NC, 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 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, References 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, References NC, 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 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, References NC, 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 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, References 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, References 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, References NC, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)  
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, References: 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: Patrons 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, References: 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, References: 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, References: 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, References: 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

   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?
8275 McChord Standard Comprehensive

133. Question Result, ID, References
   Question Text: Do Annual Reports include applicable information for gravity lines?
   Result Notes: No such relevant facilities/equipment existed in the scope of inspection review.

134. Question Result, ID, References
   Question Text: Do Annual Reports include applicable information for regulated-only gathering lines?
   Result Notes: No such relevant facilities/equipment existed in the scope of inspection review.

135. Question Result, ID, References
   Question Text: Do records indicate the original accident reports were filed as required?
   Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

136. Question Result, ID, References
   Question Text: Do records indicate accurate supplemental accident reports were filed and within the required timeframe?
   Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

137. Question Result, ID, References
   Question Text: Do records indicate immediate notifications of accidents were made in accordance with 195.52?
   Result Notes: No such event occurred, or condition existed, in the scope of inspection review. 2019 ILI had no indications rising to the level of an SRC.

138. Question Result, ID, References
   Question Text: Do records indicate safety-related condition reports were filed as required?
   Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

139. Question Result, ID, 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?
   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, References
   Question Text: Does the process give adequate instruction for the protection of pipeline against atmospheric corrosion?
   Result Notes: E-8 in the Maint Manual.

141. Question Result, ID, References
   Question Text: Does the process give adequate instruction for the inspection of aboveground pipeline segments exposed to the atmosphere?

143. Question Result, ID, References: These are done weekly in PM972 9-12-21, 9-9-21, 9-1-21, 8-26-21, 8-18-21, etc.

144. Question Result, ID, References: The above ground portions of the line are well coated.

**TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection**

144. Question Result, ID, References: No such relevant facilities/equipment existed in the scope of inspection review.

145. Question Result, ID, References: No such relevant facilities/equipment existed in the scope of inspection review.

146. Question Result, ID, References: No such relevant facilities/equipment existed in the scope of inspection review.

147. Question Result, ID, References: No such relevant facilities/equipment existed in the scope of inspection review.

148. Question Result, ID, References: No such relevant facilities/equipment existed in the scope of inspection review.

149. Question Result, ID, References: No such relevant facilities/equipment existed in the scope of inspection review.

**TD.CP: External Corrosion - Cathodic Protection**

150. Question Result, ID, References: No such relevant facilities/equipment existed in the scope of inspection review.
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, References NA, TD.CP.NEWOPERATE.R, 195.589(c) (195.563(a))

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

152. Question Result, ID, References 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 event occurred, or condition existed, in the scope of inspection review. D-6 is the procedure for new installation.

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

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, References Sat, TD.CP.ISOLATE.O, 195.575(a) (195.575(b), 195.575(c), 195.575(d))

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

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.
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 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, References** 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, References** Sat, TD.CPMONITOR.TESTLEADMAINT.O, 195.567(c)

**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, References** 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, References** 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, References** 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, References: Sat, TD.CPMONITOR.CIS.R, 195.589(c) (195.573(a)(2))
Question Text: Do records document, when circumstances dictated a need for close interval surveys, dates of completed surveys, data from 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, References: 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, References: Sat, TD.CPMONITOR.CURRENTTEST.O, 195.573(c)
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, References: Sat, TD.CPMONITOR.INTFRCURRENT.P, 195.402(c)(3) (195.577(a), 195.577(b))
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, References: Sat, TD.CPMONITOR.INTFRCURRENT.R, 195.589(c) (195.577(a))
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, References: NA, TD.CPMONITOR.INTFRCURRENT.O, 195.577(a)
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, References: Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED)
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, References: Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CP)
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, References: Sat, TD.COAT.NEWPIPE.R, 195.589(c) (195.557(a), 195.559, 195.401(c))

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, References: NA, TD.COAT.CONVERTPIPE.R, 195.589(c) (195.557(b), 195.559)

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, References: 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, References: 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, References: Sat, TD.CPEXPOSED.EXTCORRODEREPAIR.R, 195.589(c) (195.585(a), 195.585(b))

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

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, References: NA, TD.ICP.INVESTREMED.R, 195.589(c) (195.579(a))

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, References: 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: 2.5 gal per 210,000 gallons.
178. Question Result, ID, References: 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, References: 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, References: 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 (Maintaining valves). MPL qualifies as needed. In 2019 Micheals performed the repairs for the corrosion anomalies.

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

Question Text: Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?

Assets Covered: 8275

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

TQ.QU: Qualification of Personnel - Specific Requirements

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

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

Assets Covered: 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, References: Sat, TQ.QUOMCONST.INSPECTORQUAL.R, 195.204

Question Text: Do records indicate adequate qualification documentation for personnel who conduct pipe or pipeline system construction inspections? (TQ.QUOMCONST.INSPECTORQUAL.R) (detail)

Assets Covered: 8275

Result Notes: Steve Calton and John Williamson would, for example, oversee coating applications. Welding inspections 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, References: 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.
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.
Inspection Information

Inspection Name 8276 McChord Public 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 Dorough, 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)

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1. Percent completion excludes unanswered questions planned as “always observe”.

Plans

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<th>Involved Groups/Subgroups</th>
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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**

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**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, References: **Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4)** (also 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, References: **Sat, FS.FG.FACPROTECT.O, 195.436** (also presented in: PD.SN)  
   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, References: **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, References: **Sat, FS.FG.IGNITION.R, 195.404(c) (195.438)** (also presented in: PD.SN)  
   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, References: **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.

   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, References Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: PD.SN)
   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, References 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 in the Maintenance Manual.

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

9. Question Result, ID, References Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: PD.RW)
   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, References 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, References 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, References Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: PD.RW)
    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, References Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 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, References: 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, References: Sat, PD.DP.PROGRAM.P, 195.442(a)
   
   **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 excavators

16. Question Result, ID, References: Sat, PD.DP.PUBLICNOTIFY.P, 195.442(a) (195.442(c)(2))
   
   **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, References: Sat, PD.DP.EXCAVATEMARK.P, 195.442(a) (195.442(b), 195.442(c)(4), 195.442(c)(5))
   
   **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, References: 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, References: Sat, PD.DP.TPD.P, 195.442(a) (195.442(b), 195.442(c)(1))
   
   **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, References: Sat, PD.DP.TPONECALL.P, 195.442(a) (195.442(b), 195.442(c)(3))
   
   **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, References: 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. They then goes out and locates. If they are very far away from the pipeline they still perform positive response and document.

22. Question Result, ID, References: Sat, PD.DP.PROGRAM.R, 195.442(a)
   
   **Question Text:** Do records indicate the damage prevention program is being carried out as written?
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, References Sat, PD.PA.ASSETS.P, 195.440(b) (API RP 1162, Section 2.7 Step 4)
   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, References Sat, PD.PA.AUDIENCEID.P, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162 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, References Sat, PD.PA.MGMTSUPPORT.P, 195.440(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)
   Question Text Does the operator's program documentation demonstrate management support?
   Assets Covered 8276
   Result Notes G-1 Section 1

26. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 195.440(a) (195.440(h))
   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, References Sat, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162 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, References Sat, PD.PA.MESSAGES.P, 195.440(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 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, References Sat, PD.PA.SUPPLEMENTAL.P, 195.440(c) (API RP 1162 Section 6.2)
   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, References Sat, PD.PA.EDUCATE.R, 195.440(d) (195.440(f))
   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 8276
Result Notes Section 4 of the PA manual

31. Question Result, ID, References
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, References
Sat, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1)
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, References
Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also 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. They have participated in the LEPC in the past. This may change slightly due to Covid.

34. Question Result, ID, References
Sat, PD.PA.LANGUAGE.P, 195.440(g) (API RP 1162 Section 2.3.1)
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, References
Sat, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 Section 2.3.1)
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, References
Sat, PD.PA.EVALPLAN.P, 195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E)
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 the Maintenance Manual has a four year cycle listed as the minimum frequency, but they are performing every year.

37. Question Result, ID, References
Sat, PD.PA.EVALIMPL.R, 195.440(i) (195.440(i), API RP 1162 Section 8.3)
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
38. Question Result, ID, References  Sat, 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  8276
   Result Notes  Internal assessment plus 3rd party (Paradigm) assessment.

39. Question Result, ID, References  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, References  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, References  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, References  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, References  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, References  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, References  Sat, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)
   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, References** Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: MO.RW)

**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, 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** 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, References** 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** Patrois are done in vehicles and on foot. It is a suitable method.

49. **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** 8276

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

50. **Question Result, ID, References** Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 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, References** Sat, PD.RW.INFORMATION.P, 195.402(c)(3) (195.452(f)(3), 195.452(g))

**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, References** Sat, PD.RW.INFORMATION.R, 195.404(c) (195.402(c)(3), 195.452(f)(3), 195.452(g))

**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, References** 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** 8276
54. **Question Result, ID, References** 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** 8276

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

55. **Question Result, ID, References** 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, References** 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, References** 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** 8276

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

58. **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** 8276

**Result Notes** D-10 Maintenance Manual.

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

**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, References** 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, References** NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)
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.

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.
## Inspector and Operator Information

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<tr>
<th>Operator</th>
<th>Unit</th>
<th>Records Location - City &amp; State</th>
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<td>McChord Pipeline Company</td>
<td>Tacoma</td>
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<td>11-02-2021</td>
<td>11-04-2021</td>
<td>06-12-2020</td>
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## 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

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Phone</th>
<th>Email</th>
<th>Organization</th>
<th>Position</th>
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</thead>
<tbody>
<tr>
<td>John</td>
<td>Williamson</td>
<td>(253) 383-1651</td>
<td><a href="mailto:jwilliamson@parpacific.com">jwilliamson@parpacific.com</a></td>
<td>Par Pacific</td>
<td>Senior Inspector</td>
</tr>
<tr>
<td>Joel</td>
<td>Roppo</td>
<td>(253) 383-1651</td>
<td><a href="mailto:jroppo@parpacific.com">jroppo@parpacific.com</a></td>
<td>Par Pacific</td>
<td>Chief Engineer</td>
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## Instructions and Ratings Definitions

### INSPECTION RESULTS: Annual Review

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<th>Area of Concern Responses</th>
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**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

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<tr>
<th>Determination crew inspection Date</th>
<th>Inspector</th>
<th>Unit</th>
<th>Type of Work</th>
<th>Foreman Name</th>
<th>Contractor Name</th>
<th>Comments / Observations for Operator</th>
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## Facility Inspection History

### Link for Full List of Facility Inspections

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## Scheduled Inspection History

### Annual Review Inspection History

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<th>Inspection Type</th>
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## Additional Information

- **Standard Comprehensive - HL**
- **PA - Public Awareness**
- **Standard - Annual Review**
- **LIMP - Liquid Transmission Integrity Management**
- **DA - Drug & Alcohol**
- **OQ - Operator Qualification**
### GAS System Operations History

#### Annual Report - Miles of Main

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No reports found.

#### Annual Report - Leaks

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<th>Cause of Leak Services Hazardous Total</th>
<th>NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR</th>
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No reports found.

#### Annual Report - EFV

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<th>Operator</th>
<th>Year</th>
<th>Number of EFV's Installed This Calendar Year on Single Family, Residential Services:</th>
<th>Estimated Number of EFV's in the system at the End of The Year:</th>
<th>Total Number of Services with EFV Installed During Year:</th>
<th>Estimated Number of Services with EFV At The End of The Year:</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

No reports found.

### HL System Operations History

#### HL Annual Report - Miles of Pipe by Decade

<table>
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</thead>
<tbody>
<tr>
<td>2020</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
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<tr>
<td>2019</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
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<td>2018</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
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<tr>
<td>2017</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
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<tr>
<td>2015</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14</td>
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</tbody>
</table>

#### HL Annual Report - H/L Miles / H/CAs

<table>
<thead>
<tr>
<th>YEAR</th>
<th>Operator</th>
<th>Commodity Group</th>
<th>Total Segment Miles that Could Affect H/CAs</th>
<th>High Population</th>
<th>Other Population</th>
<th>Drinking Water</th>
<th>Ecological Resource</th>
<th>Comm Navigable Water</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
<td>14.25</td>
<td></td>
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</tr>
<tr>
<td>2019</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
<td>14.25</td>
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</tr>
<tr>
<td>2018</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
<td>14.25</td>
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</tr>
<tr>
<td>2017</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
<td>14.25</td>
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</tr>
<tr>
<td>2016</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14.25</td>
<td>14.25</td>
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</tr>
<tr>
<td>2015</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>14</td>
<td></td>
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</tbody>
</table>

#### HL Annual Report - Breakout Tanks

<table>
<thead>
<tr>
<th>YEAR</th>
<th>Operator</th>
<th>Commodity Group</th>
<th>Crude Oil #5</th>
<th>Refined (non-HVL) #5</th>
<th>HVL #5</th>
<th>CO2 #5</th>
<th>F Gr</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2019</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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</tr>
<tr>
<td>2018</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2017</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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</tr>
<tr>
<td>2016</td>
<td>McChord Pipeline Company</td>
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<td>0</td>
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</tbody>
</table>

### ANNUAL REPORT: ACCURACY/TRENDS

1. **Question #1:** Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.
   1. **Result:** Satisfactory

   **Notes:** Note that one mile of the system was replaced with SMLS (Seamless) pipe in the 1990’s due to a reroute on Walter Rd and that is the reason for the mileage differences.

---

**Access to Complete Distribution Annual Report**

<table>
<thead>
<tr>
<th>Year</th>
<th>SYSTEM TOTAL Miles of Main</th>
<th>Miles of Service</th>
<th>SYSTEM TOTAL NO. of Services</th>
<th>Average Service Length</th>
</tr>
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<tbody>
<tr>
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</table>

No reports found.

**Access to Complete Transmission Annual Report**

<table>
<thead>
<tr>
<th>YEAR</th>
<th>Operator</th>
<th>Commodity Group</th>
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<tbody>
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</table>

No reports found.

**Access to Complete Hazardous Liquid Annual Report**

<table>
<thead>
<tr>
<th>YEAR</th>
<th>Operator</th>
<th>Commodity Group</th>
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</thead>
<tbody>
<tr>
<td>2020</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
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<tr>
<td>2019</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
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<tr>
<td>2018</td>
<td>McChord Pipeline Company</td>
<td>Refined and/or Petroleum (non-HVL)</td>
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</tbody>
</table>
**DAMAGE PREVENTION**

### Annual Report Damage Prevention Data

<table>
<thead>
<tr>
<th>Year</th>
<th>Operator</th>
<th>Number of Excavation Tickets</th>
<th>Total Number of Excavation Damages</th>
<th>Locating Practices Not Sufficient</th>
<th>One-Call Notification Practices Not Sufficient</th>
<th>Excavation Practices Not Sufficient</th>
<th>Other</th>
<th>Number of Services</th>
<th>Total Leaks - Excavation Damage</th>
<th>Total Leaks</th>
<th>Miles of Service MAIN</th>
<th>Number of Leaks per Mile MAIN</th>
<th>Total Leaks Per 1,000 Locates</th>
<th>Number of Hits Per 1,000 Ticket Requests</th>
<th>Number of Hits Per 10,000 Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>McChord Pipeline Company</td>
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</table>

No damages found

**DIRT data on mismarks for prior year**

- **NotificationID**: 3199
- **Operator**: McChord Pipeline Company
- **Company**: McChord Pipeline Company
- **NRC #: 1,186,063
- **Assigned Engineer**: Dennis Ritter
- **Date & Time of Incident**: 08-02-2017 12:12 PM
- **Street Address of event/incident**: Intersection of 100th St and A St
- **Incident Address**: Federal

**Q2. Is the damage prevention information in the annual report complete?**

- Yes

**Q2.b. Is the annual report damages root cause information complete and accurate?**

- Yes

**Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?**

- Yes

**Q2.d. Does the operator follow a process to evaluate the cause of "locating practices not sufficient" category?**

- Yes

**Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?**

- Yes

**Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?**

- Yes

**Q2.g. What is the number of damages resulting from mismarks?**

- 0

**Q2.h. What is the number of damages resulting from not locating within the time requirements?**

- 0

**Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?**

- Yes

**Q2.j. Are mapping corrections timely and according to written procedures?**

- Yes

**Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?**

- Yes

**Q2.l. Is the operator appropriately focusing damage prevention education and training to address causes of excavation damage?**

- Yes

2. Notes

---

**DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.**

- No records found

**Question #2.** Review the following damage prevention items:

1. Did the operator follow a process to evaluate the cause of "one-call notification practices not sufficient" category?
2. Did the operator follow a process to evaluate the cause of "locating practices not sufficient" category?
3. What is the number of damages resulting from mismarks?
4. Are mapping corrections timely and according to written procedures?
5. Does the operator have a process to evaluate the cause of "one-call notification practices not sufficient" category?
6. Is the operator or its contractor qualified and following procedures for locating and marking facilities?
7. Is the operator appropriately requalifying locators to address performance deficiencies?
8. What is the number of damages resulting from not locating within the time requirements?
9. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?
10. Does the operator follow a process to evaluate causes for damages listed "excavation practices not sufficient" category?
11. Are mapping corrections timely and according to written procedures?
12. Does the operator follow a process to evaluate causes for damages listed "one-call notification practices not sufficient" category?

---

**NPMS SUBMISSIONS/CHANGES**

**Question #3.**

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

- Satisfactory

**3. Notes**

- 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 discernible trends to these incidents?

- No incidents noted in the Commissions database. The operator said there were no incidents.

**4. Notes**

- None noted

**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?

- Yes

**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)

- No incidents noted

**6. Notes**

- None noted

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

- No incidents noted

**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.

- No incidents noted

**8. Notes**

- None
### O&M & EMERGENCY PROGRAMS

<table>
<thead>
<tr>
<th>Question #9.</th>
<th>Is the O&amp;M Manual up to date and were changes made in the previous year?</th>
<th>9. Result</th>
<th>Satisfactory</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Notes</td>
<td>We currently have manuals from 2017 and 2018. During the inspection any changes since those revisions will be reviewed.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #10.</th>
<th>If changes to the O&amp;M were made, are changes acceptable?</th>
<th>10. Result</th>
<th>Satisfactory</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Notes</td>
<td>There were minor changes mostly for updated contact information.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #11.</th>
<th>Were emergency plans changed during the previous year?</th>
<th>11. Result</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Question #12.</th>
<th>Were any changes to emergency plans satisfactory?</th>
<th>12. Result</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>12. Notes</td>
<td>No changes made.</td>
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</tbody>
</table>

### INTEGRITY MANAGEMENT PROGRAMS

<table>
<thead>
<tr>
<th>Question #13</th>
<th>Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?</th>
<th>13. Result</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>13. Notes</td>
<td>No changes</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #14</th>
<th>Is the DIMP/TIMP up to date? What are the results of the operator’s program review (effectiveness evaluation) (DIMP every 5 years)?</th>
<th>14. Result</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>14. Notes</td>
<td>No changes</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #15</th>
<th>Are IMP program changes acceptable?</th>
<th>15. Result</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>15. Notes</td>
<td>No changes</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Question #16</th>
<th>Was appropriate assessment/repair work conducted during the past year? (monitor progress of IMP activities)</th>
<th>16. Results</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Question #17</th>
<th>Does the operator’s HCA location data correspond to the positional data located in UTC GIS?</th>
<th>17. Results</th>
<th>Satisfactory</th>
</tr>
</thead>
<tbody>
<tr>
<td>17. Notes</td>
<td>The operator’s system is in a developed area so there are some, but not major changes. The system is all “Could Affect” HCA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #18</th>
<th>What assessment work is planned for the upcoming year?</th>
<th>18. Results</th>
<th>Satisfactory</th>
</tr>
</thead>
<tbody>
<tr>
<td>18. Notes</td>
<td>No Ill runs until 2024 and no outstanding anomalies.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #19</th>
<th>Within the operator’s DIMP, are low pressure systems evaluated for overpressure threats?</th>
<th>19. Results</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>19. Notes</td>
<td>This is a liquid operator. This does not apply.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #20</th>
<th>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)</th>
<th>20. Results</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>20. Notes</td>
<td>This is a liquid operator. This does not apply.</td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #21</th>
<th>Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?</th>
<th>21. Results</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>21. Notes</td>
<td>No plastic pipe, or DIMP plan. This is a hazardous liquid operator.</td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #22</th>
<th>Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)</th>
<th>22. Results</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>22. Notes</td>
<td>This is a hazardous liquid operator. No DIMP Plan is required.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #23</th>
<th>What DIMP remediation work is anticipated for upcoming year?</th>
<th>23. Results</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>23. Notes</td>
<td>This is a hazardous liquid operator. No DIMP Plan is required.</td>
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</tr>
</tbody>
</table>

### OQ PROGRAM

<table>
<thead>
<tr>
<th>Question #24</th>
<th>Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.</th>
<th>24. Results</th>
<th>Satisfactory</th>
</tr>
</thead>
<tbody>
<tr>
<td>24. Notes</td>
<td>No changes to the OQ program plan.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question #25</th>
<th>Are the OQ plan updates satisfactory?</th>
<th>25. Results</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>25. Notes</td>
<td>No changes to the OQ program plan.</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Question #26</th>
<th>Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator’s plan?</th>
<th>26. Results</th>
<th>Satisfactory</th>
</tr>
</thead>
<tbody>
<tr>
<td>26. Notes</td>
<td>No changes to the OQ program plan.</td>
<td></td>
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</tr>
</tbody>
</table>
26. Notes
OQ records reviewed for MPL pipeline staff and contractors for ILI work performed in 2019 and PPM 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?
27. Results
Satisfactory
27. Notes
The PA plan has not had changes other than contact information.

Question #28
Are changes to the PA program satisfactory?
28. Results
Not Applicable
28. Notes
The PA plan has not had changes other than contact information.

CONTROL ROOM PROGRAM

Question #29
Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?
29. Results
Not Applicable
29. Notes
No changes to the CRM program have occurred.

Question #30
Are the CRM program changes satisfactory?
30. Results
Not Applicable
30. Notes
No changes to the CRM program have occurred.

SAFETY MANAGEMENT SYSTEM API 1173

Question #31
Is the operator developing and implementing an API 1173 Safety Management System?
31. Results
Satisfactory
31. Notes
The operator is not developing a SMS, but is under PSM.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32
Are inspection units broken down appropriately? Do you recommend any changes to inspection units?
32. Results
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 Company (1 Unit) | 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.
33. Results
Q33.A Pipeline Purpose and Reliability: http://www.mcchordpipeline.com/Reconfirmed in 2021
Q33.D How to get additional information: http://www.mcchordpipeline.com/contact.html
Q33.F One call requirements: http://www.mcchordpipeline.com/damageprev.html
Q33.G Potential Hazards: http://www.mcchordpipeline.com/about.html
Q33.I Leak/Damage Recognition: http://www.mcchordpipeline.com/about.html
Q33.L Integrity Management Programs: http://www.mcchordpipeline.com/integmgmt.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?
34. Results
YES
34. Notes
The operator performs a river depth of cover survey at a suitable frequency to track any potential river scour.
**Question #35**
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 concerns.

<table>
<thead>
<tr>
<th>ADB 2019-01</th>
<th>35. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2019-01: Flood Mitigation</td>
<td>Satisfactory</td>
</tr>
</tbody>
</table>

**35. Notes**
We reviewed the river study that was recently performed.

**Question #36**
Is there potential for the operator’s system to be damaged by earth movement or other seismic/geological activities?

<table>
<thead>
<tr>
<th>ADB 2019-02</th>
<th>36. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2019-02: Earth Movement/Geological Hazards</td>
<td>YES</td>
</tr>
</tbody>
</table>

**36. Notes**
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.

**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.

<table>
<thead>
<tr>
<th>ADB 2019-02</th>
<th>37. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2019-02: Earth Movement/Geological Hazards</td>
<td>Satisfactory</td>
</tr>
</tbody>
</table>

**Question #38**
Does the operator have any indoor meter sets or regulators in their system?

<table>
<thead>
<tr>
<th>ADB 2020-01</th>
<th>38. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2020-01 Inside Meter Sets</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**38. Notes**
No assets of this type

**Question #39**
If operator’s system has indoor meter sets/ regulators, did the operator review ADB 2020-0115 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator 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.

<table>
<thead>
<tr>
<th>ADB 2020-01</th>
<th>39. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2020-01 Inside Meter Sets</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**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?

<table>
<thead>
<tr>
<th>ADB 2020-01</th>
<th>40. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2020-01 Inside Meter Sets</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**40. Notes**
No assets of this type

**Question #41**
Does the operator have any low pressure systems?

<table>
<thead>
<tr>
<th>ADB 2020-02</th>
<th>41. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2020-02 Low Pressure Systems</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**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.

<table>
<thead>
<tr>
<th>ADB 2020-02</th>
<th>42. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2020-02 Low Pressure Systems</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**42. Notes**
No assets of this type

**Question #43**
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 identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

<table>
<thead>
<tr>
<th>ADB 2020-02</th>
<th>43. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2020-02 Low Pressure Systems</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**43. Notes**
No assets of this type

**Question #44**
Does the operator include all low pressure system risks in their DIMP program appropriately?

<table>
<thead>
<tr>
<th>ADB 2020-02</th>
<th>44. Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB 2020-02 Low Pressure Systems</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**44. Notes**
No assets of this type

SUMMARY OF REQUIRED COMMENTS

** COMMENTS:** Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.