

# Inspection Output (IOR)

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## Report Filters

Assets Seaport Sound OQ / Seaport OQ

Results All

## Inspection Information

Inspection Name	8456 Seaport Sound OQ	Operator(s)	SEAPORT SOUND TERMINAL, LLC (39906)	Plan Submitted	07/07/2022
		Lead	Anthony Dorrough	Plan Approval	07/08/2022 by Scott Rukke
Status	PLANNED	Team Members	Lex Vinsel, Derek Norwood	All Activity Start	10/05/2022
Start Year	2022	Supervisor	Scott Rukke	All Activity End	10/06/2022
System Type	HL	Director	Sean Mayo	Inspection Submitted	--
Protocol Set ID	WA.HL.2022.01			Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

This inspection covered plan procedures, records and field review of selected OQ tasks by qualified individuals.

### Facilities visited and Total AFOD

4130 East 11th Street

Tacoma, WA 98421

### Summary of Significant Findings

There were no significant findings or areas of concern.

### Primary Operator contacts and/or participants

Ted Lilyblade Jr. / Compliance Manager/FSO / Seaport Sound Terminal (206) 473-0678

Robert Cohee / Supervisor, Pipeline / Seaport Sound Terminal (253) 331-7278

Anthony Dorrough / Energy/Utilities Engineer / WUTC (360) 481-4035

Derek Norwood / Energy/Utilities Engineer / WUTC (360) 259-2525

### Operator executive contact and mailing address for any official correspondence

Edward Luebke / Vice President Operations / Seaport Sound Terminal (678) 772-1285

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	Seaport OQ	Seaport Sound OQ	unit	--	BOT/RT Offshore GOM Crosses Nav. Reg Rural Gather Rural Low Stress Abandoned	54	54	54	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Seaport OQ	--	TQ	P, R, O, S	Detail	--

## Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Seaport OQ	--	10/05/2022	10/06/2022	--	all planned questions	all assets	all types	54	54	54	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Seaport OQ	COMPLETED	10/25/2022	Seaport OQ	Seaport OQ

## Results (all values, 54 results)

56 (instead of 54) results are listed due to re-presentation of questions in more than one sub-group.

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

1. Question Result, ID, References [Sat, TQ.QU.CORROSIONSUPERVISE.P, 195.402\(c\) \(195.555, 195.505\(h\)\)](#) (also presented in: TQ.QU)

Question Text *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*

Assets Covered [Seaport OQ](#)

Result Notes [See Plan - Section 1 - Sub-part H - Corrosion control](#)

2. Question Result, ID, References [Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589\(c\) \(195.507\(a\), 195.507\(b\)\)](#) (also presented in: TQ.QU)

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

Assets Covered [Seaport OQ](#)

Result Notes [See Kendall Rebusman / Manager Corrosion Control Engineering - krebusman@transmontaigne.com](#)

## TQ.PROT9: OQ Protocol 9

3. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 195.501(a) (195.509(a))  
Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*  
Assets Covered Seaport OQ
4. Question Result, ID, References Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 195.501(a) (195.509(a))  
Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*  
Assets Covered Seaport OQ
5. Question Result, ID, References Sat, TQ.PROT9.AOCRECOG.O, 195.501(a) (195.509(a))  
Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*  
Assets Covered Seaport OQ
6. Question Result, ID, References Sat, TQ.PROT9.VERIFYQUAL.O, 195.501(a) (195.509(a))  
Question Text *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*  
Assets Covered Seaport OQ
7. Question Result, ID, References Sat, TQ.PROT9.CORRECTION.O, 195.501(a) (195.509(a))  
Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*  
Assets Covered Seaport OQ  
Result Notes *Reviews were conducted through VeriForce by T. Lilyblade, Taryn Garrett, and Jordan Volz (contractor) July 14, 2022 (no issues) Staff reviewed documentation from 2019 -2021*

## TQ.OQ: Operator Qualification

8. Question Result, ID, References Sat, TQ.OQ.OQPLAN.P, 195.505(a) (195.501(b), 195.503)  
Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*  
Assets Covered Seaport OQ  
Result Notes *See Plan - Sections 1.0 Background/Introduction, Section 3.0 Identification of Covered Tasks*
9. Question Result, ID, References Sat, TQ.OQ.REEVALINTERVAL.P, 195.505(g)  
Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*  
Assets Covered Seaport OQ  
Result Notes *See Plan - Sections 3.3 & 3.4 - Identification of Covered Tasks*
10. Question Result, ID, References Sat, TQ.OQ.NONQUALIFIED.P, 195.505(c)  
Question Text *Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?*  
Assets Covered Seaport OQ  
Result Notes *See Plan - Section 8 - Span of Control - Use of Non-qualified Persons to Perform Covered Tasks*
11. Question Result, ID, References Sat, TQ.OQ.EVALMETHOD.P, 195.505(b) (195.503, 195.509(d), 195.509(e))  
Question Text *Are evaluation methods established and documented appropriate to each covered task?*  
Assets Covered Seaport OQ  
Result Notes *See Plan - Section 3 - Exhibit B*

12. 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 **Seaport OQ**  
 Result Notes **Staff viewed contractors (Reconn) webpage with records for: Sean Franek/ Service Technician/ Reconn**
13. 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 **Seaport OQ**  
 Result Notes **Staff viewed OQ records for: Nicholas, Robert, Michael and Benjamin. (see QuickBase documents)**
14. Question Result, ID, References **Sat, TQ.OQ.TRAINING.P, 195.505(h)**  
 Question Text *Does the operators program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan - Sections 3, 3.6 & 7**
15. Question Result, ID, References **Sat, TQ.OQ.TRAINING.R, 195.507(a) (195.507(b), 195.505(h))**  
 Question Text *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?*  
 Assets Covered **Seaport OQ**  
 Result Notes **Staff viewed OQ records for: Nicholas, Robert, Michael and Benjamin.**
16. Question Result, ID, References **Sat, TQ.OQ.OQPLANCONTRACTOR.P, 195.505(a) (195.505(f))**  
 Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan - Sections 4.1, 4.2, 4.4 and 5 - Communication of Program Requirements**
17. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.P, 195.505(b) (195.505(c), 195.505(d), 195.505(e), 195.505(f))**  
 Question Text *Are contractor organizations or other entities that perform covered tasks qualified?*  
 Assets Covered **Seaport OQ**  
 Result Notes **Staff viewed locates performed by Sean Francke (OQ qualified individual)**
18. Question Result, ID, References **Sat, TQ.OQ.CONTRACTOREQUIV.P, 195.505(h)**  
 Question Text *Does the OQ plan assure that procedures on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan - Sections 7.0 & 7.3 - Training**
19. Question Result, ID, References **NA, TQ.OQ.OTHERENTITY.R, 195.505(b) (195.505(c), 195.503)**  
 Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*  
 Assets Covered **Seaport OQ**  
 Result Notes **No such activity/condition was observed during the inspection.**
20. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.P, 195.503 (195.505(b))**  
 Question Text *Does the OQ plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan, Section 3.6**

21. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.R, 195.507(a) (195.507(b), 195.503)**  
 Question Text *Do records indicate evaluation of qualified individuals for recognition and reaction to AOCs?*  
 Assets Covered **Seaport OQ**
22. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.O, 195.503**  
 Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions (AOCs)?*  
 Assets Covered **Seaport OQ**
23. Question Result, ID, References **Sat, TQ.OQ.PERFMONITOR.P, 195.505(d) (195.505(e))**  
 Question Text *Does the OQ program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195, or there is reason to believe an individual is no longer qualified to perform covered tasks?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan, Sections 2.0 Definitions, 9.0 Quality Assurance**
24. Question Result, ID, References **NA, TQ.OQ.PERFMONITOR.R, 195.505(d) (195.505(e))**  
 Question Text *Does the operator have records to demonstrate that they have evaluated individuals who may have contributed to an incident/accident while performing a covered task or where there is reason to believe that an individual may have no longer been qualified to perform a covered task?*  
 Assets Covered **Seaport OQ**  
 Result Notes **No such activity/condition was observed during the inspection.**
25. Question Result, ID, References **Sat, TQ.OQ.OQPLAN.O, 195.505(h)**  
 Question Text *Do individuals performing covered tasks demonstrate adequate skills and knowledge?*  
 Assets Covered **Seaport OQ**
26. Question Result, ID, References **Sat, TQ.OQ.MOC.P, 195.505(f)**  
 Question Text *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan, Section 11 Management of Change, Subpart 11.1, 11.2, & 11.5**
27. Question Result, ID, References **Sat, TQ.OQ.CHANGENOTIFY.P, 195.505(i)**  
 Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan, Section 11 (pg.18)**
28. Question Result, ID, References **Sat, TQ.OQ.CHANGERECD.R, 195.505(i) (195.505(f))**  
 Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*  
 Assets Covered **Seaport OQ**

## **TQ.QU: Qualification of Personnel - Specific Requirements**

29. Question Result, ID, References **Sat, TQ.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h))** (also presented in: TD.CP)  
 Question Text *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan - Section 1 - Sub-part H - Corrosion control**

30. 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 **Seaport OQ**  
 Result Notes **See Kendall Rebusman / Manager Corrosion Control Engineering - krebusman@transmontaigne.com**
31. Question Result, ID, References **Sat, TQ.QU.CONTROLLER.P, 195.446(h) (195.505(b))**  
 Question Text *Does the process establish, maintain, and review controller qualifications, abilities, and performance metrics, with particular attention to response to abnormal operating conditions?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Plan, Section 14 Control Room Management**
32. Question Result, ID, References **Sat, TQ.QU.CONTROLLER.R, 195.446(h) (195.507(a), 195.507(b))**  
 Question Text *Is controller training and qualification documented?*  
 Assets Covered **Seaport OQ**
33. Question Result, ID, References **Sat, TQ.QU.CONTROLLER.O, 195.446(b) (195.446(c), 195.505(b))**  
 Question Text *Do controllers demonstrate adequate skills and knowledge?*  
 Assets Covered **Seaport OQ**

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

34. Question Result, ID, References **Sat, TQ.QUOMCONST.INSPECTORQUAL.P, 195.204**  
 Question Text *Does the process require personnel who conduct pipe or pipeline system construction inspections to be adequately trained and qualified?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Construction Manual - Section D**
35. Question Result, ID, References **NA, 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 **Seaport OQ**  
 Result Notes **No such activity/condition was observed during the inspection.**
36. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTORQUAL.O, 195.204**  
 Question Text *Does the inspector who ensures pipeline systems are installed per requirements demonstrate adequate skills and knowledge?*  
 Assets Covered **Seaport OQ**  
 Result Notes **No such activity/condition was observed during the inspection.**
37. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.P, 195.222(a) (195.222(b), Section 6 of API-1104, Section IX of ASME Boiler & Pressure Vessel Code, 195.214(a))**  
 Question Text *Does the process require welders to be qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See Construction Manual, Section 10 Qualification**
38. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.R, 195.222(a) (195.214(a), 195.222(b))**  
 Question Text *Do records indicate that welders are adequately qualified?*  
 Assets Covered **Seaport OQ**
39. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.O, 195.222(a) (195.505(b), 195.214(a))**

Question Text *Do welders demonstrate adequate skills and knowledge?*  
Assets Covered **Seaport OQ**  
Result Notes **No such activity/condition was observed during the inspection.**

## **TQ.TRCNTRL: Training of Personnel - Dispatcher**

40. Question Result, ID, References **Sat, TQ.TRCNTRL.CNTRLTRAINING.P, 195.444 (195.446(e))**  
Question Text *Does the process require that dispatchers are trained in the recognition of CPM alarms?*  
Assets Covered **Seaport OQ**  
Result Notes **See O&M - Part 4 Control Room Management Plan**
41. Question Result, ID, References **Sat, TQ.TRCNTRL.CNTRLTRAINING1130.P, 195.444 (195.505(h))**  
Question Text *Do the process require dispatcher training be provided in compliance with API-1130?*  
Assets Covered **Seaport OQ**  
Result Notes **See O&M - Part 4 Control Room Management Plan**
42. Question Result, ID, References **NA, TQ.TRCNTRL.CNTRLTRAINING.R, 195.444 (195.507(a), 195.507(b))**  
Question Text *Is dispatcher training and qualification documented?*  
Assets Covered **Seaport OQ**  
Result Notes **No such activity/condition was observed during the inspection.**
43. Question Result, ID, References **NA, TQ.TRCNTRL.CNTRLTRAINING.O, 195.444 (195.505(b))**  
Question Text *Do dispatchers demonstrate adequate skills and knowledge?*  
Assets Covered **Seaport OQ**  
Result Notes **No such activity/condition was observed during the inspection.**

## **TQ.TRERP: Training of Personnel - Emergency Response**

44. Question Result, ID, References **Sat, TQ.TRERP.ERCONDITIONS.P, 195.403(a)(3)**  
Question Text *Are conditions that are likely to cause emergencies, their consequences, and appropriate corrective action identified in the ER training?*  
Assets Covered **Seaport OQ**  
Result Notes **See O&M, Part 3 Emergency Section D**
45. Question Result, ID, References **Sat, TQ.TRERP.ERFIREPROT.P, 195.403(a)(5)**  
Question Text *Are the potential causes, types, sizes, and consequences of fire and appropriate use of portable fire extinguishers and other on-site fire control equipment covered in the ER training?*  
Assets Covered **Seaport OQ**  
Result Notes **See O&M, Part 3 - Emergency Section D - Hazwoper Training**
46. Question Result, ID, References **Sat, TQ.TRERP.ERHAZTRAINING.P, 195.403(a)(2)**  
Question Text *Are the characteristics and hazards of the hazardous liquids or carbon dioxide transported covered in the ER training?*  
Assets Covered **Seaport OQ**  
Result Notes **See O&M, Part 3 - Emergency Section O - Training & Review**
47. Question Result, ID, References **Sat, TQ.TRERP.ERRELEASECONTROL.P, 195.403(a)(4)**  
Question Text *Are the steps necessary to control any accidental release of hazardous liquid to minimize the potential for fire, explosion, toxicity, or environmental damage identified in the ER training?*  
Assets Covered **Seaport OQ**  
Result Notes **See O&M, Part 4 - Section 3.2 Control Room Management Plan**

48. Question Result, ID, References **Sat, TQ.TRERP.ERTRAINING.P, 195.403(a)(1)**  
 Question Text *Does emergency response training cover the emergency procedures established under 195.402?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See O&M, Part 3 Emergency Response Plan (pg.37)**
49. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGRECORDS.R, 195.404(c) (195.403(a))**  
 Question Text *Is training for emergency response personnel documented?*  
 Assets Covered **Seaport OQ**  
 Result Notes **Staff verified Training Checklist dated 9/18/2021 & 1/24/2022**
50. Question Result, ID, References **Sat, TQ.TRERP.ERTRAINING.O, 195.403(a)**  
 Question Text *Do emergency response personnel demonstrate adequate skills and knowledge?*  
 Assets Covered **Seaport OQ**  
 Result Notes **Staff observed Corporate Level Deployment Drill online**
51. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGREVIEW.P, 195.403(b)**  
 Question Text *Does the process require review of emergency response personnel performance at the required frequency?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See O&M, Part F (pg.38)**
52. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGREVIEW.R, 195.404(c) (195.403(b))**  
 Question Text *Has review of emergency response personnel performance at the required frequency been documented?*  
 Assets Covered **Seaport OQ**
53. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGSUPERVISE.P, 195.403(c)**  
 Question Text *Does the process require supervisors be trained on emergency response procedures for which they are responsible?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See O&M, Section 3 Emergency Response Training**
54. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGSUPERVISE.O, 195.403(c) (195.405)**  
 Question Text *Do emergency response supervisors demonstrate adequate skills and knowledge?*  
 Assets Covered **Seaport OQ**

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

55. Question Result, ID, References **Sat, TQ.TROMCONST.NDT.P, 195.234(b)(2)**  
 Question Text *Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel trained and qualified in procedures and in use of the testing equipment?*  
 Assets Covered **Seaport OQ**  
 Result Notes **See O&M, Section D Part 13**
56. 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 **Seaport OQ**



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