

# Inspection Output (IOR)

Generated on 2022.December.14 09:30

## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	8442 - Petrogas OQ	Operator(s)	PETROGAS WEST, LLC (39663)	Plan Submitted	02/15/2022
Status	PLANNED	Lead	Scott Anderson	Plan Approval	02/16/2022 by Sean Mayo
Start Year	2022	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Darren Tinnerstet	All Activity Start	12/13/2022
System Type	HL	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	12/13/2022
Protocol Set ID	WA.HL.2021.02	Supervisor	Scott Rukke	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86236	Petrogas	unit	86236	Pump Stations CO2 Biofuels Crosses Nav. GOM Offshore Reg Rural Gather Rural Low Stress	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.	86236	--	TQ	P, R, O, S	Detail	--

## Plan Implementations

Activity #	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Qst Assets	Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	OQ	--	12/13/2022 -- 12/13/2022	TQ	all assets	all types	54	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".

## Forms

This inspection has no Form data entry.

## 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 **86236**  
Result Notes **Ferndale Terminal Pipeline Facility Manual sec. 2.3**  
  
**Maintenance Inspection Procedure (MIP) 501, 502, 302, 403**
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 **86236**  
Result Notes **Petrogas uses 3rd party Far West Corrosion to complete annual surveys, terminal staff performs monthly rectifier checks. Reviewed Supervisor OQs for both Petrogas employees and Far West Corrosion.**

### TQ.PROT9: OQ Protocol 9

3. Question Result, ID, References **NA, 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 **86236**  
Result Notes **No such activity/condition was observed during the inspection.**
4. Question Result, ID, References **NA, 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 **86236**  
Result Notes **No such activity/condition was observed during the inspection.**
5. Question Result, ID, References **NA, 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 **86236**  
Result Notes **No such activity/condition was observed during the inspection.**
6. Question Result, ID, References **NA, 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 **86236**  
Result Notes **No such activity/condition was observed during the inspection.**
7. Question Result, ID, References **NA, 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 **86236**  
Result Notes **No such activity/condition was observed during the inspection.**

## TQ.OO: Operator Qualification

8. Question Result, ID, References **Sat, TQ.OO.OOPLAN.P, 195.505(a) (195.501(b), 195.3(c)(B)(9))**  
Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*  
Assets Covered **86236**  
Result Notes **OQ Manual section 8.1**
9. Question Result, ID, References **Sat, TQ.OO.REEVALINTERVAL.P, 195.505(g)**  
Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*  
Assets Covered **86236**  
Result Notes **OQ Manual section 8.1**
10. Question Result, ID, References **Sat, TQ.OO.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 **86236**  
Result Notes **OQ Manual section 12**
11. Question Result, ID, References **Sat, TQ.OO.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 **86236**  
Result Notes **OQ manual section(s) 8.1, 8.2**
12. Question Result, ID, References **NA, TQ.OO.OOCONTRACTOR.R, 195.507(a) (195.507(b))**  
Question Text *Are adequate records containing the required elements maintained for contractor personnel?*  
Assets Covered **86236**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
13. Question Result, ID, References **Sat, TQ.OO.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 **86236**  
Result Notes **Petrogas uses Energy World Net for OQ qualifications, reviewed employees Chris Blankenhorn, supervisor Ryan Taylor**
14. Question Result, ID, References **Sat, TQ.OO.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 **86236**  
Result Notes **OQ Manual section(s) 7.0, 7.1, and 7.2**
15. Question Result, ID, References **Sat, TQ.OO.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 **86236**  
Result Notes **Reviewed initial qualification, retraining and reevaluation documentation for employees Chris Blankenhorn and Daniel Vickers**
16. Question Result, ID, References **Sat, TQ.OO.OOPLANCONTRACTOR.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 86236

Result Notes OQ Manual section(s) 8.1 and 13.0

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 86236

Result Notes OQ Manual section(s) 8.1, 12.0, and 13.0

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 86236

Result Notes OQ Manual 8.2 and 8.2.2

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 86236

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

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 86236

Result Notes OQ Manual section(s) 8.1

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 86236

Result Notes Reviewed multiple employees OQ qualifications for the recognition and reaction to AOCs

22. Question Result, ID, References NA, 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 86236

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

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 86236

Result Notes OQ Manual section(s) 9.0, 10.0, and 11.0

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 86236

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

25. Question Result, ID, References NA, TQ.OQ.OOPLAN.O, 195.505(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills and knowledge?*

Assets Covered 86236  
Result Notes No such activity/condition was observed during the inspection.

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 86236  
Result Notes OQ Manual section(s) 15.0

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 86236  
Result Notes OQ Manual section(s) 15.0

28. Question Result, ID, References Sat, TQ.OQ.CHANGERECORD.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 86236  
Result Notes Reviewed OQ manual revisions log showing changes.

## 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 86236  
Result Notes Ferndale Terminal Pipeline Facility Manual sec. 2.3

Maintenance Inspection Procedure (MIP) 501, 502, 302, 403

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 86236  
Result Notes Petrogas uses 3rd party Far West Corrosion to complete annual surveys, terminal staff performs monthly rectifier checks. Reviewed Supervisor OQs for both Petrogas employees and Far West Corrosion.

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 86236  
Result Notes OQ Manual section(s) 15.0

32. Question Result, ID, References NA, TQ.QU.CONTROLLER.R, 195.446(h) (195.507(a), 195.507(b))

Question Text *Is controller training and qualification documented?*

Assets Covered 86236  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

33. Question Result, ID, References NA, TQ.QU.CONTROLLER.O, 195.446(b) (195.446(c), 195.505(b))

Question Text *Do controllers demonstrate adequate skills and knowledge?*

Assets Covered 86236  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## 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 **86236**  
Result Notes **Ferndale Terminal Pipeline Facility Manual sec. 2.3**  
**Maintenance Inspection Procedure (MIP) 501, 502, 302, 403**
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 **86236**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
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 **86236**  
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 **86236**  
Result Notes **Ferndale Terminal Pipeline Facility Manual**  
**MIP-403 Pipe Repair**  
**MIP-407 Welding**
38. Question Result, ID, References **NA, 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 **86236**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
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 **86236**  
Result Notes **No such activity/condition was observed during the inspection.**

## TQ.TRCNTRL: Training of Personnel - Dispatcher

40. Question Result, ID, References **NA, 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 **86236**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
41. Question Result, ID, References **NA, 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 86236

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

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 86236

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

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 86236

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 86236

Result Notes Ferndale Terminal Pipeline System

section 8.0

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 86236

Result Notes Ferndale Terminal Pipeline System

section 8.0

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 86236

Result Notes Ferndale Terminal Pipeline System

section 8.0

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 86236

Result Notes Ferndale Terminal Pipeline System

section 8.0

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 86236

Result Notes Ferndale Terminal Pipeline System

section 8.0

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 **86236**  
 Result Notes **Whatcom County Fire District 7 is the first responder for the Petrogas facility**
50. Question Result, ID, References **NA, TQ.TRERP.ERTRAINING.O, 195.403(a)**  
 Question Text *Do emergency response personnel demonstrate adequate skills and knowledge?*  
 Assets Covered **86236**  
 Result Notes **No such activity/condition was observed during the inspection.**
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 **86236**  
 Result Notes **Ferndale Terminal Pipeline System**  
  
**section 8.0**
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 **86236**
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 **86236**  
 Result Notes **Ferndale Terminal Pipeline System**  
  
**section 8.0**
54. Question Result, ID, References **NA, TQ.TRERP.ERTRAININGSUPERVISE.O, 195.403(c) (195.405)**  
 Question Text *Do emergency response supervisors demonstrate adequate skills and knowledge?*  
 Assets Covered **86236**  
 Result Notes **No such activity/condition was observed during the inspection.**

## **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 **86236**  
 Result Notes **Ferndale Terminal Pipeline Facility Manual**  
  
**MIP-403 Pipe Repair**  
  
**MIP-407 Welding**
56. Question Result, ID, References **NA, 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 **86236**  
 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.