

Inspection Output (IOR)

Report Filters

Assets Inland Empire Paper Section 114 / IEP 114
Results All

Inspection Information

Inspection Name	8516 Inland Empire Section 114	Operator(s)	INLAND EMPIRE PAPER CO (8140)	Plan Submitted	08/19/2022
		Lead	Anthony Dorrrough	Plan Approval	08/19/2022 by Scott Rukke
Status	LOCKED	Team Members	Deborah Becker	All Activity Start	08/10/2022
Start Year	2022	Supervisor	Scott Rukke	All Activity End	08/11/2022
System Type	GT	Director	Sean Mayo	Inspection Submitted	08/19/2022
Protocol Set ID	WA.GT.2022.01			Inspection Approval	09/09/2022 by Sean Mayo

Inspection Summary

Inspection Scope and Summary

This inspection is a review of the Inland Empire Paper Company (IEP) pipeline system for the enhanced Safety (PIPES) Act of 2020, according to Section 114 Protecting our infrastructure of Pipelines.

Facilities visited and Total AFOD

This inspection was conducted online using Microsoft Teams.

Summary of Significant Findings

There were no significant findings as a result of this inspection, however pertinent information was collected.

Primary Operator contacts and/or participants

Kevin Davis/Production Manager/IEP (509) 924-1911 (same for all contacts)

Doug Krapas/Environmental Manager/IEP

Theron (TJ) Eixenberger/Plant Engineer/IEP

Operator executive contact and mailing address for any official correspondence

Kevin Rasler/President/IEP

3320 North Argonne Road

Milwood, WA 99212

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	IEP 114	Inland Empire Paper Section 114	unit	--	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned	21	21	21	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.	IEP 114	--	114.GT	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.	IEP 114	--	08/10/2022 08/11/2022	--	all planned questions	all assets	all types	21	21	21	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	IEP 114	COMPLETED	08/19/2022	IEP 114	IEP 114

Results (all values, 21 results)

55 (instead of 21) results are listed due to re-presentation of questions in more than one sub-group.

114.GT: Section 114 - Gas Transmission

- Question Result, ID, References: NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text: *What are your assets comprised of?*

Assets Covered: IEP 114
- Question Result, ID, References: NA, SRN.114.GASTRANSPORT.S, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text: *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*

Assets Covered: IEP 114

Result Notes: No such activity/condition was observed during the inspection.
- Question Result, ID, References: NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text: *Do you use natural gas-fueled drivers or engines to compress natural gas?*

Assets Covered: IEP 114

Result Notes: No such activity/condition was observed during the inspection.
- Question Result, ID, References: NA, SRN.114.NGUSE.S, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text: *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*

Assets Covered: IEP 114

Result Notes: No such activity/condition was observed during the inspection.
- Question Result, ID, References: NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text: *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*

Assets Covered: IEP 114

Result Notes: No such relevant facilities/equipment existed in the scope of inspection review.
- Question Result, ID, References: NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text: *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*

- Assets Covered IEP 114
- Result Notes No such activity/condition was observed during the inspection.
7. Question Result, ID, References **Sat**, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)
- Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*
- Assets Covered IEP 114
- Result Notes Located in O&M, see sections: 2.02; 2.07; 3.02 and 4.01 and ERM, see sections: 1.6; 2.4; 10.2
8. Question Result, ID, References **Sat**, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*
- Assets Covered IEP 114
- Result Notes Located in O&M, see sections: 3.06 and 4.06
9. Question Result, ID, References **Sat**, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*
- Assets Covered IEP 114
- Result Notes Located in the ERM, see section 2 & 4
10. Question Result, ID, References **Sat**, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
- Assets Covered IEP 114
- Result Notes Located in O&M, see sections: 2.05; 2.07; 3.02 and 3.03 also ERM section 10.5
11. Question Result, ID, References **Sat**, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)
- Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*
- Assets Covered IEP 114
12. Question Result, ID, References **Sat**, 114.114.LKMITGRPRREPAIR.P, 49 U.S.C. 60108(a)
- Question Text *Do procedures provide alternatives to cutouts (to reduce emissions)?*
- Assets Covered IEP 114
- Result Notes IEP will shut-down and isolate the pipeline in the event of a leak in accordance with O&M sections: 3.04; 3.05; 3.06 and 6.0
13. Question Result, ID, References **Sat**, 114.114.TESTESD.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)
- Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*
- Assets Covered IEP 114
- Result Notes Located in O&M section 4.05
14. Question Result, ID, References **Sat**, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*
- Assets Covered IEP 114
- Result Notes Located in O&M section 4.06
15. Question Result, ID, References **Sat**, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)
- Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*

- Assets Covered IEP 114
- Result Notes Located in O&M section 3.06
16. Question Result, ID, References **Sat**, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
- Assets Covered IEP 114
- Result Notes Located in O&M sections: 3.06 and 4.06
17. Question Result, ID, References NA, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)
- Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*
- Assets Covered IEP 114
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
18. Question Result, ID, References NA, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
- Assets Covered IEP 114
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
19. Question Result, ID, References NA, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
- Assets Covered IEP 114
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
20. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*
- Assets Covered IEP 114
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
21. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
- Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*
- Assets Covered IEP 114
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

114.UNGS: Section 114 - Underground Natural Gas Storage

22. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GT, 114.GGBOOST)
- Question Text *What are your assets comprised of?*
- Assets Covered IEP 114
23. Question Result, ID, References NA, SRN.114.GASTRANSPORT.S, (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*
- Assets Covered IEP 114
- Result Notes No such activity/condition was observed during the inspection.
24. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.GT, 114.GGBOOST)

- Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*
- Assets Covered IEP 114
- Result Notes No such activity/condition was observed during the inspection.
25. Question Result, ID, References NA, SRN.114.NGUSE.S, (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*
- Assets Covered IEP 114
- Result Notes No such activity/condition was observed during the inspection.
26. Question Result, ID, References NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*
- Assets Covered IEP 114
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
27. Question Result, ID, References NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*
- Assets Covered IEP 114
- Result Notes No such activity/condition was observed during the inspection.
28. Question Result, ID, References **Sat**, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*
- Assets Covered IEP 114
- Result Notes Located in O&M, see sections: 3.06 and 4.06
29. Question Result, ID, References **Sat**, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*
- Assets Covered IEP 114
- Result Notes Located in the ERM, see section 2 & 4
30. Question Result, ID, References **Sat**, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
- Assets Covered IEP 114
- Result Notes Located in O&M, see sections: 2.05; 2.07; 3.02 and 3.03 also ERM section 10.5
31. Question Result, ID, References **Sat**, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*
- Assets Covered IEP 114
- Result Notes Located in O&M section 4.06
32. Question Result, ID, References **Sat**, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
- Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
- Assets Covered IEP 114
- Result Notes Located in O&M sections: 3.06 and 4.06

33. Question Result, ID, References NA, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
 Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
 Assets Covered IEP 114
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
34. Question Result, ID, References NA, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
 Assets Covered IEP 114
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
35. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
 Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*
 Assets Covered IEP 114
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
36. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)
 Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*
 Assets Covered IEP 114
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

114.GGBOOST: Section 114 - Gas Gathering & Boosting

37. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GT, 114.UNGS)
 Question Text *What are your assets comprised of?*
 Assets Covered IEP 114
38. Question Result, ID, References NA, SRN.114.GASTRANSPORT.S, (also presented in: 114.GT, 114.UNGS)
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*
 Assets Covered IEP 114
 Result Notes No such activity/condition was observed during the inspection.
39. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.GT, 114.UNGS)
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*
 Assets Covered IEP 114
 Result Notes No such activity/condition was observed during the inspection.
40. Question Result, ID, References NA, SRN.114.NGUSE.S, (also presented in: 114.GT, 114.UNGS)
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*
 Assets Covered IEP 114
 Result Notes No such activity/condition was observed during the inspection.
41. Question Result, ID, References NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
 Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*
 Assets Covered IEP 114
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

42. Question Result, ID, References NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
 Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*
 Assets Covered IEP 114
 Result Notes No such activity/condition was observed during the inspection.
43. Question Result, ID, References **Sat**, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)
 Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*
 Assets Covered IEP 114
 Result Notes Located in O&M, see sections: 2.02; 2.07; 3.02 and 4.01 and ERM, see sections: 1.6; 2.4; 10.2
44. Question Result, ID, References **Sat**, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
 Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*
 Assets Covered IEP 114
 Result Notes Located in O&M, see sections: 3.06 and 4.06
45. Question Result, ID, References **Sat**, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
 Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*
 Assets Covered IEP 114
 Result Notes Located in the ERM, see section 2 & 4
46. Question Result, ID, References **Sat**, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
 Assets Covered IEP 114
 Result Notes Located in O&M, see sections: 2.05; 2.07; 3.02 and 3.03 also ERM section 10.5
47. Question Result, ID, References **Sat**, 114.114.TESTESD.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)
 Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*
 Assets Covered IEP 114
 Result Notes Located in O&M section 4.05
48. Question Result, ID, References **Sat**, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*
 Assets Covered IEP 114
 Result Notes Located in O&M section 4.06
49. Question Result, ID, References **Sat**, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*
 Assets Covered IEP 114
 Result Notes Located in O&M section 3.06
50. Question Result, ID, References **Sat**, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
 Assets Covered IEP 114

	Result Notes	Located in O&M sections: 3.06 and 4.06
51.	Question Result, ID, References	NA, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)
	Question Text	<i>Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?</i>
	Assets Covered	IEP 114
	Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.
52.	Question Result, ID, References	NA, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
	Question Text	<i>What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?</i>
	Assets Covered	IEP 114
	Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.
53.	Question Result, ID, References	NA, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
	Question Text	<i>Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?</i>
	Assets Covered	IEP 114
	Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.
54.	Question Result, ID, References	NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
	Question Text	<i>Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?</i>
	Assets Covered	IEP 114
	Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.
55.	Question Result, ID, References	NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
	Question Text	<i>Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?</i>
	Assets Covered	IEP 114
	Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.