

Inspection Output (IOR)

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Report Filters

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

Results All

Inspection Information

Inspection Name 8612 - Nouryon Operator(s) NOURYON PULP AND PERFORMANCE
Public CHEMICALS LLC (32358) Plan Submitted 08/03/2023
Awareness Lead David Cullom Plan Approval --
Program (PA) Observer(s) Lex Vinsel, Anthony Dorrough, Derek Norwood, All Activity Start 08/01/2023
Inspe Scott Anderson, Tom Green, Ling Shang All Activity End 08/01/2023
Status STARTED Supervisor Dennis Ritter Inspection Submitted --
Start Year 2023 Director Scott Rukke Inspection Approval --
System Type GT
Protocol Set ID WA.GT.2023.01

Inspection Summary

Inspection Scope and Summary

This was a Public Awareness (PA) Program Review covering procedures and records relating to selected procedures.

Facilities visited and Total AFOD

This was an Public Awareness (PA) Program review. It did not contain a field inspection component. 1 AFOD

Summary of Significant Findings

There was (1) probable violation during this inspection.

The operator was not performing ROW patrols in 2020 and 2021 at the railroad crossing twice per year not to exceed 7.5 months. The patrol was being performed once a year for 2020 and 2021.

§ 192.705 Transmission lines: Patrolling.

(a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.

(b) The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:

| | Class location of line | Maximum interval between patrols | |
|------|------------------------|--|---|
| | | At highway and railroad crossings | At all other places |
| 1, 2 | | 7 1/2 months; but at least twice each calendar year | 15 months; but at least once each calendar year. |
| 3 | | 4 1/2 months; but at least four times each calendar year | 7 1/2 months; but at least twice each calendar year. |
| 4 | | 4 1/2 months; but at least four times each calendar year | 4 1/2 months; but at least four times each calendar year. |

(c) Methods of patrolling include walking, driving, flying or other appropriate means of traversing the right-of-way.

Primary Operator contacts and/or participants

Esteban (Steve) Martinez - HSES Manager- Nouryon Pulp and Performance Chemicals LLC (509) 765-6400

Taylor Stout - Nouryon Pulp and Performance Chemicals LLC (509) 765-6400

Operator executive contact and mailing address for any official correspondence

Steve Martinez HSES Manager esteban.martinez@nouryon.com (509) 765-6400

Michael Bradley Everline Compliance Director, Utility Services michael.bradley@everlineus.com (315) 527-5025

Mailing Address:

1775 W Oak Commons Ct, Marietta, Georgia 30062

Inspection Setup Criteria

This PA inspection is scheduled for Aug 1-4, 2023 and will coincide with the O&M and OQ program reviews. Nouryon is currently classified as a transmission system and transports Hydrogen. The inspection crosswalk specifies that the group "PD" will be selected for plan setup.

Scope (Assets)

| # | Short Name | Long Name | Asset Type | Asset IDs | Excluded Topics | Planned | Required | Inspected | Total | Required % Complete |
|----|--------------|--|------------|-----------|---|---------|----------|-----------|-------|---------------------|
| 1. | 86235 (1852) | NOURYON PULP & PERFORMANCE CHEMICALS LLC | unit | 86235 | Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Service Line Bottle/Pipe - Holders | 47 | 47 | 47 | 47 | 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. | 86235 (1852) | -- | PD | P, R, O, S | Detail | -- |

Plan Implementations

| # | Activity Name | SMART Act# | Start Date | Focus Directives | Involved Groups/Subgroups | Assets | Qst Type(s) | Planned | Required | Inspected | Total | Required % Complete |
|---|---------------|------------|--------------------------|------------------|---------------------------|--------------|-------------|---------|----------|-----------|-------|---------------------|
| 1 | PA Inspection | -- | 08/01/2023 08/01/2023 | -- | PD | 86235 (1852) | all types | 47 | 47 | 47 | 47 | 100.0% |

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

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

Forms

| No. | Entity | Form Name | Status | Date Completed | Activity Name | Asset |
|-----|-----------------|---------------|-----------|----------------|---------------|--------------|
| 1. | Attendance List | PA Inspection | COMPLETED | 08/03/2023 | PA Inspection | 86235 (1852) |

Results (all values, 47 results)

53 (instead of 47) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERG: Emergency Response

- Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (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 86235 (1852)

Result Notes Records reviewed during this inspection consisted of:

 - Grant County LEPC Nov 10, 2022. This is done monthly and then yearly meetings are for the Hydrogen pipeline. They have records for 2019, 2020, and 2022. Prior years records are also available.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

- Question Result, ID, Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)

References

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 86235 (1852)

Result Notes The patrolling reference was not found in the PA manual, but it was found in Section 7.1 of the O&M Manual under Pipeline Patrol: Transmission Lines.
- Question Result, ID, Unsat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)

References

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered 86235 (1852)

Result Issue Summary The operator was not performing ROW patrols in 2020 and 2021 at the railroad crossing twice per year not to exceed 7.5 months. The patrol was being performed once a year for 2020 and 2021.

§ 192.705 Transmission lines: Patrolling.

(a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.

(b) The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:

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(c) Methods of patrolling include walking, driving, flying or other appropriate means of traversing the right-of-way.

Standard Issues A1 (Significant impact/widespread occurrence) : 192.705(b) : Records indicate requirement not completed at required intervals.

Result Notes Patrols reviewed for 2020-2022. In 2020 and 2021 it was done once a year. (RR Xings should be 2x/yr) 2019, 2020, 2021. Monthly leak surveys were still being performed. Performing ROW patrols going forward for every month in 2022 and 2023. The ROW patrols are now performed when conducting the leak surveys.

4. Question Result, ID, NA, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References PD.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 86235 (1852)

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

5. Question Result, ID, NA, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW) References

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

Assets Covered 86235 (1852)

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

6. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References PD.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 86235 (1852)

Result Notes This is in Section 18.2 (Pipeline Markers) of the O&M manual. It also contains Washington State requirements.

It is also in Section 9.4 of the PA manual.

PD.DP: Damage Prevention

7. Question Result, ID, Sat, PD.DP.PDPROGRAM.P, 192.614(a) References

Question Text *Is a damage prevention program approved and in place?*

Assets Covered 86235 (1852)

Result Notes The previous PA inspection was performed in 2019 by Lex Vinsel. The plan version we currently have on file has a revision date of 5/10/2023. The plan has been place for several inspection cycles.

8. Question Result, ID, Sat, PD.DP.ONECALL.P, 192.614(b) References

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

Assets Covered 86235 (1852)

Result Notes This is on contained in Section 6.10 and Section 7.2 of the PA manual and it discusses that under CFR 198.37 ,which requires states to have a One Call System, it is following that regulation. WAC 480-93-250 is the actual requirement for the operator, but the outcome is the same.

9. Question Result, ID, Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5) References

Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*

Assets Covered 86235 (1852)

Result Notes This is in the PA manual Section 9.5 (Pipeline Locates) It states they will witness all pipeline crossings and inspections will be performed before and after excavation activities. (Page 9-4) Also in O&M 18.4

10. Question Result, ID, Sat, PD.DP.TPD.P, 192.614(c)(1) References

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

Assets Covered 86235 (1852)

Result Notes O&M Section 18.1 and 18.8 Section 9.8 (last bullet) discusses supplemental enhancements and TPD is listed.

11. Question Result, ID, References Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)

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

Assets Covered 86235 (1852)

Result Notes This is part of the post incident O&M Manual Section 19.18 - Investigation to property or structure (Item I)

12. Question Result, ID, References NA, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered 86235 (1852)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. I asked for the last 3 years. 2013 was the last One Call on record.

13. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered 86235 (1852)

Result Notes No excavation records. 2020 Stakeholders brochures reviewed. Resident mailers for 2020 reviewed. Stakeholder mailing list from 2020 reviewed. The operator has records from 2020 - 2022 that were reviewed.

14. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered 86235 (1852)

Result Notes Section 5.1 in the PA manual There is mention of this in Section 9 Measure 4 (Achieving Bottom Line Results) on pg 9-16 where it does discuss known near misses and TPD.

15. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered 86235 (1852)

Result Notes ROW patrols are stored in 3A and are being now conducted monthly with the leak survey.

16. Question Result, ID, References Sat, PD.DP.NOTICETOEXCAVATOR.P,

Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*

Assets Covered 86235 (1852)

Result Notes Section 18.10 Table (Item 2)

17. Question Result, ID, References NA, PD.DP.NOTICETOEXCAVATOR.R,

Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*

Assets Covered 86235 (1852)

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

18. Question Result, ID, References Sat, PD.DP.COMMISSIONREPORT.P,

Question Text *Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*

Assets Covered 86235 (1852)

Result Notes Section 18.10 table #3

19. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**
 Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*
 Assets Covered **86235 (1852)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

PD.PA: Public Awareness

20. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 192.616(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 **86235 (1852)**
 Result Notes **Section 3.1 of the O&M and Section 4.1 in the PA manual**
21. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 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 **86235 (1852)**
 Result Notes **This is discussed in Section 5 in the PA Plan. Section 5.1, 5.3, 5.4, 5.5, 5.6.**
22. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 192.616(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 **86235 (1852)**
 Result Notes **Section 1.5 of the PA Manual contains this.**
23. Question Result, ID, References **Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))**
 Question Text *Has the continuing public education (awareness) program been established as required?*
 Assets Covered **86235 (1852)**
 Result Notes **Documentation and a plan is available. I reviewed the revision log for each year.**
24. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(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 **86235 (1852)**
 Result Notes **Stakeholder records were reviewed back to 2020.**
25. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 192.616(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 gas is transported?*
 Assets Covered **86235 (1852)**
 Result Notes **This is in the PA manual Section 8 Delivery Methods and Frequencies Page 8-1. There is a table that details the delivery method and the stakeholder audiences, for example Pipeline Markers - > "All stakeholders" One-Call Center Outreach -> "Excavators",. etc**
26. Question Result, ID, References **Sat, PD.PA.SUPPLEMENTAL.P, 192.616(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, as described in API RP 1162?*
 Assets Covered **86235 (1852)**
 Result Notes **Section 9.8 of the PA manual discusses supplemental enhancements.**

27. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(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 gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?*
 Assets Covered **86235 (1852)**
 Result Notes **These are in the supplemental brochures reviewed. These are mailed out in English and Spanish.**
28. Question Result, ID, References **Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))**
 Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*
 Assets Covered **86235 (1852)**
 Result Notes **The brochure discusses how to get more location information from the NPMS. They are mailed through FedEx. Copies are available of how many were sent out In 2022 There were 212 Excavators and construction, 83 Officials/Schools, Agricultural 120, and 236 affected public mailers.**
29. Question Result, ID, References **Sat+, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)**
 Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*
 Assets Covered **86235 (1852)**
 Result Notes **They are all done annually for all audiences.**
30. Question Result, ID, References **Sat, PD.PA.LANGUAGE.P, 192.616(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 **86235 (1852)**
 Result Notes **Section 6.2 in the PA manual.**
31. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(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 **86235 (1852)**
 Result Notes **Spanish mailers reviewed.**
32. Question Result, ID, References **Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(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 **86235 (1852)**
 Result Notes **Section 9.13**
33. Question Result, ID, References **Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)**
 Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*
 Assets Covered **86235 (1852)**
 Result Notes **There is a PA report. No required changes have been implemented.**
34. Question Result, ID, References **Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(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 program implementation?*
 Assets Covered **86235 (1852)**
 Result Notes **The reviews are performed by Everline (a 3rd party contractor) annually. 2020-2022 annual audits were performed by Everline and records were checked for those reviews.**

35. Question Result, ID, References **NA, PD.PA.PROGRAMIMPROVE.R, 192.616(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 **86235 (1852)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. there have been no changes due to audits or reviews**
36. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 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 **86235 (1852)**
 Result Notes **The first 4-year program effectiveness with Everline will be performed in Nov/Dec of 2023. The last PA inspection was performed in 2019 so the effectiveness review spans inspections.**
37. Question Result, ID, References **Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)**
 Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
 Assets Covered **86235 (1852)**
 Result Notes **The first 4-year program effectiveness with Everline will be performed in Nov/Dec of 2023. The last PA inspection was performed in 2019 so the effectiveness review spans inspections.**
38. Question Result, ID, References **Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(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 **86235 (1852)**
 Result Notes **The first 4-year program effectiveness with Everline will be performed in Nov/Dec of 2023. The last PA inspection was performed in 2019 so the effectiveness review spans inspections.**
39. Question Result, ID, References **Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(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 **86235 (1852)**
 Result Notes **The first 4-year program effectiveness with Everline will be performed in Nov/Dec of 2023. The last PA inspection was performed in 2019 so the effectiveness review spans inspections.**
40. Question Result, ID, References **Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)**
 Question Text *Were bottom-line results of the program measured 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 **86235 (1852)**
 Result Notes **The first 4-year program effectiveness with Everline will be performed in Nov/Dec of 2023. The last PA inspection was performed in 2019 so the effectiveness review spans inspections.**
41. Question Result, ID, References **Sat, PD.PA.CHANGES.R, 192.616(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 **86235 (1852)**
 Result Notes **The first 4-year program effectiveness with Everline will be performed in Nov/Dec of 2023. The last PA inspection was performed in 2019 so the effectiveness review spans inspections.**

PD.SP: Special Permits

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

Question Text *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*

Assets Covered 86235 (1852)

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

43. Question Result, ID, References NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*

Assets Covered 86235 (1852)

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

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

Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*

Assets Covered 86235 (1852)

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

45. Question Result, ID, References NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*

Assets Covered 86235 (1852)

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

46. Question Result, ID, References NA, PD.SP.AMAOP.P, 190.341(d)(2)

Question Text *If the operator operates a pipeline under an AMAOP special permit have the processes been modified to incorporate the requirements of the permit?*

Assets Covered 86235 (1852)

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

47. Question Result, ID, References NA, PD.SP.AMAOP.R, 190.341(d)(2) (192.605(b))

Question Text *If the operator operates a pipeline under an AMAOP special permit, do records indicate that required repairs were performed?*

Assets Covered 86235 (1852)

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

PD.PA: Public Awareness

48. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: EP.ERG)

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

Assets Covered 86235 (1852)

Result Notes Records reviewed during this inspection consisted of:

- Grant County LEPC Nov 10, 2022. This is done monthly and then yearly meetings are for the Hydrogen pipeline. They have records for 2019, 2020, and 2022. Prior years records are also available.

PD.RW: ROW Markers, Patrols, Monitoring

49. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 86235 (1852)

Result Notes The patrolling reference was not found in the PA manual, but it was found in Section 7.1 of the O&M Manual under Pipeline Patrol: Transmission Lines.

50. Question Result, ID, References Unsat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text Do records indicate that ROW surface conditions have been patrolled as required?

Assets Covered 86235 (1852)

Result Issue Summary The operator was not performing ROW patrols in 2020 and 2021 at the railroad crossing twice per year not to exceed 7.5 months. The patrol was being performed once a year for 2020 and 2021.

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(c) Methods of patrolling include walking, driving, flying or other appropriate means of traversing the right-of-way.

Standard Issues A1 (Significant impact/widespread occurrence) : 192.705(b) : Records indicate requirement not completed at required intervals.

Result Notes Patrols reviewed for 2020-2022. In 2020 and 2021 it was done once a year. (RR Xings should be 2x/yr) 2019, 2020, 2021. Monthly leak surveys were still being performed. Performing ROW patrols going forward for every month in 2022 and 2023. The ROW patrols are now performed when conducting the leak surveys.

51. Question Result, ID, References NA, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text Are line markers placed and maintained as required?

Assets Covered 86235 (1852)

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

52. Question Result, ID, References NA, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)

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

Assets Covered 86235 (1852)

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

53. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text Does the process adequately cover the requirements for placement of ROW markers?

Assets Covered 86235 (1852)

Result Notes This is in Section 18.2 (Pipeline Markers) of the O&M manual. It also contains Washington State requirements.

It is also in Section 9.4 of the PA manual.

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