

# 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	9023 - McChord HL Public Awareness Review 2025	Operator(s)	MCCHORD PIPELINE CO. (31049)	Plan Submitted	01/09/2025
		Lead	Scott Anderson	Plan Approval	01/14/2025 by Dennis Ritter
		Observer(s)	David Cullom, Anthony Dorrough, Derek Norwood, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	04/07/2025
Status	LOCKED	Supervisor	Scott Rukke	All Activity End	04/10/2025
Start Year	2025	Director	Dennis Ritter	Inspection Submitted	01/05/2026
System Type	HL			Inspection Approval	01/05/2026 by Dennis Ritter
Protocol Set ID	WA.HL.2024.02				

## Inspection Summary

### Inspection Scope and Summary

This inspection consisted of a review of McChord Pipeline Company's Public Awareness records and procedures.

### Facilities visited and Total AFOD

1 AFOD

### Summary of Significant Findings

No findings

### Primary Operator contacts and/or participants

Maureen Burns, Par Pacific Compliance Manager, Par Pacific

Michelle Loveless, Par Hawaii Compliance Coordinator, Par Pacific

Todd Chant, Par Montana Area Supervisor, Par Pacific

John Williamson, McChord Senior Inspector, McChord Pipeline Company

Mike McNalley, ROW Manager, Par Pacific

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

Andrew Troske

Vice President

McChord Pipeline Company

3001 Marshall Ave

Tacoma, WA 98421

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88980 (72)	McChord Pipeline Company	unit	88980	Pump Stations Offshore GOM Crosses Nav. HVL CO2 Biofuels Rural Low Stress Reg Rural Gather Abandoned BOT/RT	48	48	48	48	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.	88980 (72)	--	PD	P, R	Detail	--

## Plan Implementations

Activity # Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Qst Assets Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. PA Questions	--	04/07/2025 -- 04/10/2025		all planned questions	all assets	48	48	48	48	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 Questions	COMPLETED	09/10/2025	PA Questions	88980 (72)

## Results (all values, 48 results)

56 (instead of 48) results are listed due to re-presentation of questions in more than one sub-group.

### EP.ERL: Emergency Response Liquids

- Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References 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 88980 (72)

Result Notes Reviewed sign-in sheet for first responder training for 2024. Also reviewed spreadsheets containing the stakeholder audiences listed in this question for 2022-2024. McChord is part of the LEPC, reviewed sign-in sheets for 2022-2024

### FS.FG: Facilities General

2. Question Result, ID, References **Sat, FS.FG.IGNITION.R, 195.404(c) (195.438)** (also presented in: PD.SN)  
 Question Text *Do records show precautions taken to prevent ignition sources in areas with a potential for accumulating flammable vapors or leaking hazardous liquids?*  
 Assets Covered **88980 (72)**  
 Result Notes **Reviewed pictures showing no smoking signs at applicable facilities. Reviewed a sample JHA that Par uses. Also reviewed sample hot work permits used by US oil.**
3. Question Result, ID, References **Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434)** (also presented in: PD.SN)  
 Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Maintenance Manual D-10 section 2.7.**
4. Question Result, ID, References **Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438)** (also presented in: PD.SN)  
 Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Maintenance Manual D-10 section 2.7.**
5. Question Result, ID, References **Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436)** (also presented in: PD.SN)  
 Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Maintenance Manual D-10 section 2.5 and section 4.**

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

6. Question Result, ID, References **Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b))** (also presented in: PD.RW)  
 Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*  
 Assets Covered **88980 (72)**  
 Result Notes **Patrols are performed weekly by MPL Senior Inspector John Williamson or other certified MPL employees. Reviewed a sampling of weekly patrol forms, PM-0972 for 2022-2024.**
7. Question Result, ID, References **Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b))** (also presented in: PD.RW)  
 Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Maintenance Manual D-2 section 1 and D-1 Comprehensive Scheduling Chart.**
8. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 1162, Section 8)** (also presented in: PD.RW)  
 Question Text *Does the process address how line markers are to be placed and maintained?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Maintenance Manual D-2 section 4.1-4.6.**

## PD.DP: Damage Prevention

9. Question Result, ID, References **Sat, PD.DP.ONECALL.P, 195.442(a) (195.442(b))**  
 Question Text *Does the process require participation in qualified one-call systems?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Damage Prevention Manual section 2.2.**

10. Question Result, ID, References **Sat, PD.DP.PROGRAM.P, 195.442(a)**  
 Question Text *Does the operator have a damage prevention program approved and in place?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Damage Prevention Manual section 1.1.**
11. Question Result, ID, References **Sat, PD.DP.PUBLICNOTIFY.P, 195.442(a) (195.442(c)(2))**  
 Question Text *Does the process include public notification requirements?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Public Awareness Manual section 1.1 and 2.1.**
12. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.P, 195.442(a) (195.442(b), 195.442(c)(4), 195.442(c)(5))**  
 Question Text *Does the process require marking proposed excavation sites?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Damage Prevention Manual section 3.3.**
13. Question Result, ID, References **Sat, PD.DP.EXCAVATE.P, 195.442(a) (195.442(c)(6))**  
 Question Text *Does the process include inspection of pipelines that could be damaged by excavation activities?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Damage Prevention Manual section 4.1.**
- Third Party Excavation Checklist, ROW-1000 for third-party excavation being performed within 10 ft.**
- Piping Inspection and Remedial Action Report, REG-0901 for pipeline exposure.**
14. Question Result, ID, References **Sat, PD.DP.TPD.P, 195.442(a) (195.442(b), 195.442(c)(1))**  
 Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Public Awareness Manual section 5.5. MPL also uses a software called Utilisphere. It is a ticket management software that tracks communications with excavators. The data tracked from Utilisphere is shared with MPLs third party PA company, Paradigm.**
15. Question Result, ID, References **Sat, PD.DP.TPDONECALL.P, 195.442(a) (195.442(b), 195.442(c)(3), 195.402(c)(5), 195.452(g)(2))**  
 Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Damage Prevention Manual section 6.**
16. Question Result, ID, References **Sat, PD.DP.PROGRAM.R, 195.442(a)**  
 Question Text *Do records indicate the damage prevention program is being carried out as written?*  
 Assets Covered **88980 (72)**  
 Result Notes **The damage prevention program is being carried out as written. Reviewed 3rd Party Excavation Safe Work Checklists, ROW-1000 forms. Reviewed four year effectiveness review performed by Paradigm in 2023 for excavator outreach. Reviewed Utilisphere data that shows excavators that requested locates in 2024. Also reviewed letter sent to excavators.**
17. 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 **88980 (72)**  
 Result Notes **Par-MPL Damage Prevention Manual section 6 details TPD incidents, 6.2.3 is specific to sending a letter to excavators.**
18. 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 88980 (72)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Not since 2017

19. 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 480-75-630(6)?*

Assets Covered 88980 (72)

Result Notes Par-MPL Maintenance Manual section E-13 section 7.

20. Question Result, ID, References Sat, 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 480-75-630(6)?*

Assets Covered 88980 (72)

Result Notes Reviewed WUCC complaint form that is filed to the WUTC occurring in October 2024 and September 2025 for not calling locates prior to excavation. None occurred in 2022 or 2023.

21. Question Result, ID, References Sat, PD.DP.LOCATES.P,

Question Text *Is there a process to locate hazardous liquid pipelines within the timeframe outlined in RCW 19.122?*

Assets Covered 88980 (72)

Result Notes Par-MPL Damage Prevention Manual section 2.5. Section 3.2 details line locating.

22. Question Result, ID, References Sat, PD.DP.LOCATES.R,

Question Text *Do records indicate hazardous liquid pipeline locations have been marked in the timeframe outlined in RCW 19.122?*

Assets Covered 88980 (72)

Result Notes Reviewed sampling of locate requests for 2022-2024, all marks were put down within two business days of the work begin date.

## PD.PA: Public Awareness

23. Question Result, ID, References Sat, PD.PA.ASSETS.P, 195.440(b) (API RP 1162, Section 2.7 Step 4)

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered 88980 (72)

Result Notes Par-MPL Public Awareness Manual section 1.3 and section 4 table 3.

24. Question Result, ID, References Sat, PD.PA.AUDIENCEID.P, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162 Section 3)

Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*

Assets Covered 88980 (72)

Result Notes Par-MPL Public Awareness Manual section 5. Par-MPL uses third party Paradigm to analyze the data of these stakeholder audiences.

25. Question Result, ID, References Sat, PD.PA.MGMTSUPPORT.P, 195.440(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text *Does the operator's program documentation demonstrate management support?*

Assets Covered 88980 (72)

Result Notes Par-MPL Public Awareness Manual Management Commitment and Support letter at the beginning of the Public Awareness manual.

26. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 195.440(a) (195.440(h))

Question Text *Has the continuing public education (awareness) program been established as required?*

Assets Covered 88980 (72)

Result Notes Par-MPL Public Awareness Manual section 1.1 and 2.7.

27. Question Result, ID, Sat, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162 References 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 88980 (72)

Result Notes Reviewed multiple spreadsheets listing individuals listed in the stakeholder audiences in this question for 2022-2024.

28. Question Result, ID, Sat, PD.PA.MESSAGES.P, 195.440(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 References Section 5)

Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where hazardous liquid or carbon dioxide is transported?*

Assets Covered 88980 (72)

Result Notes Par-MPL Public Awareness Program Manual section 2.7 for frequencies, section 6 for delivery method, section 7.2 for message content for all audiences, 7.3-7.6 for specific stakeholder audiences.

29. Question Result, ID, Sat, PD.PA.SUPPLEMENTAL.P, 195.440(c) (API RP 1162 Section 6.2) References

Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience along all pipeline systems, as described in API RP 1162?*

Assets Covered 88980 (72)

Result Notes Par-MPL Public Awareness Program Manual section 8.1-8.3.

30. Question Result, ID, Sat, PD.PA.EDUCATE.R, 195.440(d) (195.440(f)) References

Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §195.440(d)?*

Assets Covered 88980 (72)

Result Notes Par-MPL sends out a specified letter, business reply card, and a calendar. Each month in the calendar discusses the categories listed in 195.440(d). If the business reply card is filled out and returned, the resident has a chance to win a \$200 gift card. See example in attachments for the calendar.

31. Question Result, ID, Sat, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f)) References

Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?*

Assets Covered 88980 (72)

Result Notes Par-MPL sends out a specified letter, business reply card, and a calendar. Each month in the calendar discusses the categories listed in 195.440(d). If the business reply card is filled out and returned, the resident has a chance to win a \$200 gift card. See example in attachments for the calendar.

32. Question Result, ID, Sat, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1) References

Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1?*

Assets Covered 88980 (72)

Result Notes Messages are delivered annually.

33. Question Result, ID, Sat, PD.PA.LANGUAGE.P, 195.440(g) (API RP 1162 Section 2.3.1) References

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 88980 (72)

Result Notes Par-MPL Public Awareness Program Manual section 7. Uses Census data to determine this.

34. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 Section 2.3.1)**  
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
 Assets Covered **88980 (72)**  
 Result Notes **The message can be sent in Spanish upon request via the MPL Business Reply Cards. Per the US Census there is 0.8% Spanish speaking residents along the MPL ROW. The business reply cards, if returned, give a chance to win one of three \$200 gift card.**
35. Question Result, ID, References **Sat, PD.PA.EVALPLAN.P, 195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E)**  
 Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL Public Awareness Program Manual section 11.**
36. Question Result, ID, References **Sat, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**  
 Question Text *Has an audit or review of the public awareness program implementation been performed annually since the program was developed?*  
 Assets Covered **88980 (72)**  
 Result Notes **Reviewed annual audit form ROW-1019 for 2024. Also reviewed form PM 1814 for 2022-2023. These assessments are performed annually by Paradigm.**
37. Question Result, ID, References **Sat, PD.PA.AUDITMETHODS.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**  
 Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of the public awareness program implementation?*  
 Assets Covered **88980 (72)**  
 Result Notes **Par-MPL participates in the annual audit but uses 3rd-party contractor Paradigm to analyze data.**
38. Question Result, ID, References **Sat, PD.PA.PROGRAMIMPROVE.R, 195.440(c) (API RP 1162 Section 8.3)**  
 Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*  
 Assets Covered **88980 (72)**  
 Result Notes **Annual audit form ROW-1019 for 2024 discussed changing the mailing buffers for certain stakeholder audiences and Par is in the process of doing this. Also reviewed form PM 1814 for 2022-2023, there were no recommendations.**
39. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 Sections 8.4)**  
 Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*  
 Assets Covered **88980 (72)**  
 Result Notes **Reviewed the effectiveness review performed 5/10/23 by Paradigm. The considerations included changing delivery month to earlier in the year, additional outreach to emergency response agencies, supplemental delivery efforts to public officials, and consider removing One-Call from communications and questions.**
40. Question Result, ID, References **Sat, PD.PA.MEASUREOUTREACH.R, 195.440(c) (API RP 1162 Section 8.4.1)**  
 Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*  
 Assets Covered **88980 (72)**  
 Result Notes **Reviewed stakeholder outreach in the four year effectiveness evaluation and it was tracked. Par-MPL sends a letter notifying the stakeholder/resident, a calendar including information about the pipeline, and a Business Reply Card that gives the resident a chance to win a \$200 gift card.**
41. Question Result, ID, References **Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(c) (API RP 1162 Section 8.4.2)**  
 Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered 88980 (72)

Result Notes This data is collected in the four year effectiveness evaluation performed by Paradigm. To measure understandability the company uses both qualitative and quantitative analysis techniques to evaluate the message clarity, format, media, and stakeholder's understanding of messages.

42. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 195.440(c) (API RP 1162 Section 8.4.3)

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered 88980 (72)

Result Notes This data is collected in the four year effectiveness evaluation performed by Paradigm. The survey conducted includes a means of assessing behavior by including questions to report on damage prevention activities, leak response behavior, and reporting possible ROW encroachment.

43. Question Result, ID, References Sat, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 Section 8.4.4)

Question Text *Did the operator attempt to measure bottom-line results of the program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*

Assets Covered 88980 (72)

Result Notes Reviewed data in the four year effectiveness review performed in 2023, bottom-line results were tracked. There has not been any TPD since 2017 and One-Call ticket trends revealed that 2019 had the highest number of tickets and 2021 with the lowest.

44. Question Result, ID, References Sat, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered 88980 (72)

Result Notes Par is reviewing the stakeholder audience buffers system wide. No other changes have been recommended.

## PD.RW: ROW Markers, Patrols, Monitoring

45. Question Result, ID, References Sat, PD.RW.INFORMATION.P, 195.402(c)(3) (195.452(f)(3), 195.452(g))

Question Text *Does the process require damage prevention information to be gathered and recorded during pipeline patrols and surveillance and then analyzed?*

Assets Covered 88980 (72)

Result Notes Par-MPL Damage Prevention Manual section 4, 5, 10.

46. Question Result, ID, References Sat, PD.RW.INFORMATION.R, 195.404(c) (195.402(c)(3), 195.452(f)(3), 195.452(g))

Question Text *Do records show damage prevention information being gathered and recorded during pipeline patrols and surveillance and then analyzed is available for review?*

Assets Covered 88980 (72)

Result Notes This is being tracked using the Utilisphere software. Also Form ROW-1015 is used when excavation occurs within 36" of the pipeline to verify depth of cover.

## PD.SP: Special Permits

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

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

Assets Covered 88980 (72)

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

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

Question Text *If a pipeline is operated under a special permit, do records indicate that required repairs were performed?*

Assets Covered 88980 (72)

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

## PD.PA: Public Awareness

49. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: EP.ERL)

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

Assets Covered 88980 (72)

Result Notes Reviewed sign-in sheet for first responder training for 2024. Also reviewed spreadsheets containing the stakeholder audiences listed in this question for 2022-2024. McChord is part of the LEPC, reviewed sign-in sheets for 2022-2024

## PD.RW: ROW Markers, Patrols, Monitoring

50. Question Result, ID, Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: MO.RW) References

Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*

Assets Covered 88980 (72)

Result Notes Par-MPL Maintenance Manual D-2 section 1 and D-1 Comprehensive Scheduling Chart.

51. Question Result, ID, Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: MO.RW) References

Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*

Assets Covered 88980 (72)

Result Notes Patrols are performed weekly by MPL Senior Inspector John Williamson or other certified MPL employees. Reviewed a sampling of weekly patrol forms, PM-0972 for 2022-2024.

52. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP References 1162, Section 8) (also presented in: MO.RW)

Question Text *Does the process address how line markers are to be placed and maintained?*

Assets Covered 88980 (72)

Result Notes Par-MPL Maintenance Manual D-2 section 4.1-4.6.

## PD.SN: Facilities Signage and Security

53. Question Result, ID, Sat, FS.FG.IGNITION.R, 195.404(c) (195.438) (also presented in: FS.FG) References

Question Text *Do records show precautions taken to prevent ignition sources in areas with a potential for accumulating flammable vapors or leaking hazardous liquids?*

Assets Covered 88980 (72)

Result Notes Reviewed pictures showing no smoking signs at applicable facilities. Reviewed a sample JHA that Par uses. Also reviewed sample hot work permits used by US oil.

54. Question Result, ID, Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: FS.FG) References

Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*

Assets Covered 88980 (72)

Result Notes Par-MPL Maintenance Manual D-10 section 2.7.

55. Question Result, ID, Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: FS.FG) References

Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*

Assets Covered 88980 (72)

Result Notes [Par-MPL Maintenance Manual D-10 section 2.5 and section 4.](#)

56. Question Result, ID, References [Sat, FS.FG.SIGNAGE.P, 195.402\(c\)\(3\) \(195.434\)](#) (also presented in: FS.FG)

Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*

Assets Covered [88980 \(72\)](#)

Result Notes [Par-MPL Maintenance Manual D-10 section 2.7.](#)

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.