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	9044_Tidewater_LIMP_2025	Operator(s)	TIDEWATER, INC (31051)	Plan Submitted	06/05/2025
Status	LOCKED	Lead	David Cullom	Plan Approval	06/09/2025 by Dennis Ritter
Start Year	2025	Observer(s)	Anthony Dorrough, Derek Norwood, Scott Anderson, Joe Subsits, John Trier, Marina Rathbun, Tom Green, Jason Hoxit, Emma Barrett	All Activity Start	06/16/2025
System Type	HL			All Activity End	06/18/2025
Protocol Set ID	WA.HL.2024.02	Supervisor	Dennis Ritter	Inspection Submitted	07/02/2025
		Director	Scott Rukke	Inspection Approval	07/03/2025 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This inspection was a review of the operator's Integrity Management Program plans, procedures, records, and selected field facilities. Breakout tanks were visited, high and high high level alarms were checked, CP PSP readings taken and rectifier(s) operation checked.

Tidewater currently operates three pipeline systems and associated facilities:

1. The Snake River Terminal (SRT) Inbound/Outbound Pipelines (i.e., the pipeline system) are owned and operated by Tidewater Terminal Company (Tidewater) and are used to transport gasoline and distillate fuels between SRT and Northwest Pipeline (NWT Pipeline) located approximately one mile to the west. The pipeline system includes three separate pipelines;

• One 6-inch gasoline pipeline for inbound service,

• One 6-inch distillate pipeline for inbound service, and

3

• One 6-inch gasoline/distillate pipeline for outbound service.

The pipeline system delivers at a rate of 1,000 barrels per hour (bph) to tankage at NWT bulk terminal and 650 bph to the NWT Pipeline manifold. Each pipeline in the system is of 6-inch diameter steel pipe construction with a wall thickness of 0.188 inches. The pipeline system is 4,903 feet in length. The maximum operating pressure of each pipeline in the system is 285 pounds per square inch-gauge (psig), and the line fill volume is approximately 185 barrels for each pipeline. The elevation difference between the NWT Pipeline manifold and the pipeline system’s manifold at SRT (i.e., the Snake River Pump Station #1) is -21 feet.

2. Snake River Terminal has break out tanks, piping, pumps, and valves that are all regulated as part of the facility. The regulated break out tanks are documented in the SRT Breakout Tanks Integrity Spreadsheet.

3. The SRT Pasco Rail Diesel Line (i.e., the pipeline) is owned and operated by Tidewater and is used to transport dyed 2D15 diesel fuel from SRT to the Burlington Northern Santa Fe (BNSF) Railway refueling depot (i.e., the Pasco BNSF Rail Yard) located approximately 4 miles to the west. Diesel fuel is pumped from the Snake River Pump Station #2, which is located at SRT, to the BNSF Receiving Station and then to aboveground storage tanks located at the Pasco BNSF Terminal (i.e., Tanks A and B) which are owned and operated by BNSF.

The pipeline is of 4-inch diameter steel pipe construction with a wall thickness of 0.237 inches. It is approximately 4.2 miles in length. The maximum operating pressure of the pipeline is 835 pounds psig. Diesel fuel is pumped to the Pasco BNSF Terminal storage tanks at rates ranging between 1,000 and1,400 barrels per day (bpd). The average flow rate is 400 bph. The line fill volume is approximately 348 barrels.

4. The Umatilla Hinkle Rail Diesel Line (i.e., the pipeline) is owned and operated by Tidewater and is used to transport dyed 2D15 diesel fuel from Tidewater's Umatilla Terminal (UMA) to the Union Pacific Rail Road's (UPRR) refueling depot (i.e., the UP Rail Yard) located approximately 11 miles to the south in Hinkle, Oregon. Diesel fuel is pumped from the Umatilla Pump Station #1, which is located at UMA, to the UP Receiving Station and then to aboveground storage tanks (i.e., Tanks A and B) located at the Hinkle UP Terminal which are owned and operated by UPRR.

The pipeline is of 4-inch diameter steel pipe construction with a wall thickness of 0.156 inches. It is approximately 10.8 miles in length. The maximum operating pressure of the pipeline is 740 pounds psig. Diesel fuel is pumped to the Hinkle UP Terminal storage tanks at rates ranging between 2,000 to 3,000 bpd. The average flow rate is 200 bph. The line fill volume is approximately 753 barrels.

Facilities visited and Total AFOD

(2) AFODS - Facilities at the Snake River Terminal were visited in Pasco, Wa.

Summary of Significant Findings

There were no areas of concern or probable violation findings during this inspection.

Primary Operator contacts and/or participants
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Notes

June 28th, 2022 was the last IMP inspection.

Inspection Crosswalk Detail: LIMP - HL Integrity Management 3 Group LI, or Group TD, AR, IM and/or Directive--HL IM, HL IM Implementation, BO Tank Inspection

Joe Subsits attended from PHMSA for a State Program Audit.

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88982 (1019)	Tidewater - Snake Ri	unit	88982	--	326	326	326	100.0%

Report Filters: Results: all

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88982 (1019)	--	TD, AR, IM	P, R, O, S	Detail	--
2.	88982 (1019)	HL IM Implementation, BO Tank Inspection, HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, 114, GENERIC	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.	Records and Field	--	06/16/2025 06/18/2025	--	all planned questions	all assets	all types	326	326	326	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	Records and Field	COMPLETED	06/26/2025	Records and Field	88982 (1019)

Results (all values, 326 results)

352 (instead of 326) results are listed due to re-presentation of questions in more than one sub-group.

AR.EC: External Corrosion Direct Assessment (ECDA)

1. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.O, 195.505 (195.452(b)(5), 195.452(f)(8), 195.555)

Question Text: *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered: 88982 (1019)

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

ILI is the assessment method.

2. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.P, 195.505 (195.452(f)(8), 195.555)

Question Text: *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered: 88982 (1019)

Result Notes: The operator uses ILI as an assessment method.

A combo-tool consisting of a deformation tool combined with a magnetic flux leakage (MFL) tool was used on the pipeline to detect corrosion and deformation anomalies.

Report Filters: Results: all

3. Question Result, ID, References: NA, AR.EC.ECDAREVQUAL.R, 195.507 (195.452(l)(1), 195.555)

Question Text: *Do the records indicate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*

Assets Covered: 88982 (1019)

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

4. Question Result, ID, References: NA, AR.EC.ECDAPLAN.P, 195.588(b)(1) (195.588(b)(2) - (5), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text: *Is there a process in place for conducting ECDA?*

Assets Covered: 88982 (1019)

Result Notes: The operator uses ILI as an assessment method.

A combo-tool consisting of a deformation tool combined with a magnetic flux leakage (MFL) tool was used on the pipeline to detect corrosion and deformation anomalies.

5. Question Result, ID, References: NA, AR.EC.ECDAPREASSESS.R, 195.589(c) (195.588(b)(2), 195.452(l)(1)(ii), 195.452(j)(5)(iii), 195.452(f)(5))

Question Text: *Do the records indicate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3?*

Assets Covered: 88982 (1019)

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

6. Question Result, ID, References: NA, AR.EC.ECDAINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.588(b))

Question Text: *Does the process include integrating ECDA results with other information?*

Assets Covered: 88982 (1019)

Result Notes: The operator uses ILI as an assessment method.

A combo-tool consisting of a deformation tool combined with a magnetic flux leakage (MFL) tool was used on the pipeline to detect corrosion and deformation anomalies.

7. Question Result, ID, References: NA, AR.EC.ECDAINTEGRATION.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.588(b))

Question Text: *Do the records indicate that the operator integrated other data/information when evaluating data/results?*

Assets Covered: 88982 (1019)

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

8. Question Result, ID, References: NA, AR.EC.ECDAREGION.R, 195.589(c) (195.588(b)(2)(ii), 195.588(b)(3), 195.588(b)(5)(ii), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii), 195.588(b)(1))

Question Text: *Do the records indicate that the operator identified ECDA Regions?*

Assets Covered: 88982 (1019)

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

9. Question Result, ID, References: NA, AR.EC.ECDAINDIRECT.R, 195.589(c) (195.588(b)(3), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text: *Do the records indicate that the ECDA indirect inspection process complied with NACE SP0502-2010?*

Assets Covered: 88982 (1019)

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

10. Question Result, ID, References: NA, AR.EC.ECDADIRECT.R, 195.589(c) (195.588(b)(4), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))

Question Text: *Do the records indicate that excavations, direct examinations, and data collection were performed in accordance with NACE SP0502-2010, Section 5?*

Assets Covered: 88982 (1019)

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

11. Question Result, ID, References: NA, AR.EC.ECDADIRECT.O, 195.588(b)(4) (195.588(b)(1), 195.452(b)(5), 195.452(f)(5),)

Question Text *Were ECDA direct examinations conducted in accordance with the plan?*

Assets Covered 88982 (1019)

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

12. Question Result, ID, References NA, AR.EC.ECDAANALYSIS.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(j)(5)(iii))

Question Text *Do the records indicate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely?*

Assets Covered 88982 (1019)

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

13. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.P, 195.588(b)(4)(iii) (195.452(f)(4))

Question Text *Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?*

Assets Covered 88982 (1019)

Result Notes The operator uses ILI as an assessment method.

A combo-tool consisting of a deformation tool combined with a magnetic flux leakage (MFL) tool was

used on the pipeline to detect corrosion and deformation anomalies.

14. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.R, 195.589(c) (195.588(b)(4)(iii), 195.452(l)(1)(ii), 195.452(f)(4))

Question Text *Do the records indicate that changes in the ECDA plan have been implemented and documented?*

Assets Covered 88982 (1019)

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

15. Question Result, ID, References NA, AR.EC.ECDAPOSTASSESS.R, 195.589(c) (195.588(b)(5), 195.452(l)(1)(ii), 195.452(f)(4))

Question Text *Do the records indicate that the requirements for post assessment were implemented?*

Assets Covered 88982 (1019)

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

AR.SCC: Stress Corrosion Cracking Direct Assessment (SCCDA)

16. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.P, 195.588(c) (195.452(f)(5), 195.555)

Question Text *Does the process require that operator and vendor personnel, including supervisors, who apply SCCDA methodology and/or review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88982 (1019)

Result Notes The operator uses ILI as an assessment method.

A combo-tool consisting of a deformation tool combined with a magnetic flux leakage (MFL) tool was

used on the pipeline to detect corrosion and deformation anomalies.

17. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.R, 195.507 (195.452(l)(1)(ii), 195.588(c), 195.555)

Question Text *Do the records indicate that operator/vendor personnel, including supervisors, who apply SCCDA methodology and/or conduct assessments or review assessment results, are qualified for the tasks they perform?*

Assets Covered 88982 (1019)

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

18. Question Result, ID, References NA, AR.SCC.SCCDAPLAN.P, 195.588(c) (195.452(f)(5))

Question Text *Where operator uses direct assessment on an onshore pipeline to evaluate the effects of stress corrosion cracking, does the operator have a Stress Corrosion Cracking Direct Assessment (SCCDA) Plan that*

includes all the requirements of 195.588(c) and all the requirements and recommendations of NACE SP0204-2008 (IBR)?

Assets Covered 88982 (1019)

Result Notes The operator uses ILI as an assessment method.

A combo-tool consisting of a deformation tool combined with a magnetic flux leakage (MFL) tool was

used on the pipeline to detect corrosion and deformation anomalies.

19. Question Result, ID, References NA, AR.SCC.SCCDAPREASSESS.R, 195.589(c) (195.452(l)(1)(ii), 195.588(c), 195.452(g))

Question Text *Do the records indicate that data was collected and evaluated / integrated in accordance with the Pre-Assessment data gathering and integration requirements?*

Assets Covered 88982 (1019)

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

20. Question Result, ID, References NA, AR.SCC.SCCDAINDIRINSP.R, 195.589(c) (195.452(l)(1)(ii), 195.588(c))

Question Text *Do the records indicate that the operator conducted Indirect Inspections via aboveground or other types of measurements, in accordance with NACE SP0204-2008, Section 4?*

Assets Covered 88982 (1019)

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

21. Question Result, ID, References NA, AR.SCC.SCCDAREMEDIATE.R, 195.589(c) (195.452(l)(1)(ii), 195.588(c))

Question Text *Do the records indicate that the operator prioritized and conducted mitigation activities to address locations at which significant SCC has been detected, in accordance with NACE SP0204, Section 6?*

Assets Covered 88982 (1019)

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

22. Question Result, ID, References NA, AR.SCC.SCCDAPOSTASSESS.R, 195.589(c) (195.452(l)(1)(ii), 195.588(c), 195.452(g))

Question Text *Do the records indicate that the operator conducted the Post-Assessment Step to determine whether SCC mitigation is required, in accordance with NACE SP0204-2008, Section 6?*

Assets Covered 88982 (1019)

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

23. Question Result, ID, References NA, AR.SCC.SCCDAREASSESSINTRVL.R, 195.589(c) (195.452(l)(1)(ii), 195.588(c))

Question Text *Do the records indicate that the operator determined a re-assessment interval based on analysis of SCCDA results?*

Assets Covered 88982 (1019)

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

24. Question Result, ID, References NA, AR.SCC.SCCDAEFFMETHODS.R, 195.589(c) (195.452(l)(1)(ii), 195.588(c))

Question Text *Do the records indicate that the operator evaluated the effectiveness of the SCCDA approach used in its SCCDA Plan?*

Assets Covered 88982 (1019)

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

25. Question Result, ID, References NA, AR.SCC.SCCDAALL.O, 195.588(c) (195.505)

Question Text *From field observations, was SCCDA performed in accordance with the SCCDA plan?*

Assets Covered 88982 (1019)

Result Notes ILI is the assessment method.

AR.IA: Integrity Assessments

26. Question Result, ID, References Sat, AR.IA.BAPMETHOD.P, 195.452(f)(2) (195.452(c)(1)(i), 195.452(c)(1)(i)(A))

Question Text *Beginning July 1, 2020, does the Baseline Assessment Plan include inline inspection tools to assess line pipe based on the range of relevant threats to the pipeline segment?*

Assets Covered 88982 (1019)

Result Notes A list of threats are in Section 5.3.

5.3 RISK ASSESSMENT RESULTS

After a review of the specific risks to each of Tidewater's assets it was determined that:

• The biggest risk to Tidewater's pipeline is excavation activities.

• Corrosion, while still a risk is largely mitigated by the climate coupled with the cathodic protection system on the pipelines.

• The sandy soil around Tidewater's pipeline systems would largely mitigate the overland spread of liquid pool.

• Crossings of foreign pipeline systems is an area to be monitored by monthly and annual corrosion inspections.

After the evaluation of the risk assessment results it was determined that a five year In-Line Assessment was the preferred method.

27. Question Result, ID, References Sat, AR.IA.BAPMETHOD.R, 195.452(l)(1)(ii) (195.452(c)(1)(i))

Question Text *For baseline assessments performed on or after July 1, 2020, were the assessments completed using the appropriate assessment method(s)?*

Assets Covered 88982 (1019)

Result Notes Completion dates for the last ILI runs include:

April 23, 2025 in 6" Inbound and Outbound, April 22, 2025 SRT Pasco Diesel Rail 4"

28. Question Result, ID, References Sat, AR.IA.METHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)

Question Text *Does the process specify assessment methods that are appropriate for the pipeline integrity threats?*

Assets Covered 88982 (1019)

Result Notes 5.3 RISK ASSESSMENT RESULTS

After a review of the specific risks to each of Tidewater's assets it was determined that:

• The biggest risk to Tidewater's pipeline is excavation activities.

• Corrosion, while still a risk is largely mitigated by the climate coupled with the cathodic protection system on the pipelines.

• The sandy soil around Tidewater's pipeline systems would largely mitigate the overland spread of liquid pool.

• Crossings of foreign pipeline systems is an area to be monitored by monthly and annual corrosion inspections.

After the evaluation of the risk assessment results it was determined that a five year In-Line Assessment was the preferred method.

The operator uses ILI to identify the following risks.

RISK ANALYSIS CONSIDERATIONS

The following issues will be considered for each pipeline system (P) and/or facility asset (F).

Pipeline (P) or Facility (F)

Consideration

P / F

Populated areas, unusually sensitive environmental areas, National Fish Hatcheries, commercially navigable waters, areas where people congregate

P

Results from previous testing/inspection (see 49 CFR

P / F

Leak history.

P

Known corrosion or condition of pipeline (see 49 CFR

P / F

Cathodic protection history.

P / F

Type and quality of pipe coating (disbanded coating results in i)

P / F

Age of asset and type of pipe seam.

P / F

Product transported.

P / F

Pipe or tank wall thickness (thicker walls give a better safety margin).

P / F

Size of pipe or tank capacity (higher volume release if it ruptures).

P / F

Location related to potential seismic activity, climatic, or geologic i

P / F

Security of throughput (effects on customers if there is a failure requiring shutdown).

P

Time since last internal inspection/pressure testing.

P

With respect to previously discovered defects/anomalies, the type growth rate, and size.

P

Operating stress levels in the pipeline.

P / F

Location of the asset as it relates to the ability of the operator to detect and respond to a leak. (e.g., pipelines deep underground, or in locations that make leak detection difficult without specific sectional monitoring and/or significantly impede access for spill

P

Physical support of the segment such as by a cable suspension

P / F

Non-standard or other than recognized industry practice on asset installation (e.g., horizontal directional drilling)

29. Question Result, ID, References: Sat, AR.IA.METHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)

Question Text: *Do the records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats?*

Assets Covered: 88982 (1019)

Result Notes: I reviewed the April 2025 ILI preliminary report SRT Pasco Rail Diesel Line to BN Station 4" x 4.19mi Deformation and MFL. TDW performed.

(24,000 YS was a default value provided by TDW - Not the actual YS)

Table 4 in the Systems Operations Manual has the assessment methods.

No metal loss or immediate conditions. No dents.

6" X 2.57 mi Diesel DEF MFL and XYZ tool. No metal loss. No dents.

30. Question Result, ID, References: Sat, AR.IA.ASSESSSCHEDULE.P, 195.452(f)(5) (195.452(j)(3), 195.452(j)(5), 195.452(e), 195.452(g), 195.591, 195.452(d)(1), 195.452(n))

Question Text: *Does the process for assessment include a prioritized schedule in accordance with 195.452(d) for baseline assessments and 195.452 (j) for continual assessments that is based on all the risk factors required by 195.452(e)?*

Assets Covered: 88982 (1019)

Result Notes: This is still in the same section as it was in the last inspection on pages 4 and 5 of the IMP manual.

Tidewater IMP section 2.3. The baseline assessment was completed in 2007 for the 4" lines, 2005 for the 6" lines.

31. Question Result, ID, References: Sat, AR.IA.ASSESSSCHEDULE.R, 195.452(l)(1)(ii) (195.452(b)(5), 195.452(c), 195.452(d), 195.452(f)(5), 195.452(j)(3), 195.452(j)(5), 195.591)

Question Text: *Do the records indicate that assessments are implemented as specified in the assessment plan?*

Assets Covered: 88982 (1019)

Result Notes: These were both completed in April 22-23, 2025. The Hinkle line was also done in 2025.

32. Question Result, ID, References: Sat, AR.IA.REVIEWQUAL.P, 195.452(f)(8) (195.452(g), 195.452(h)(2))

Question Text: *Does the process specify qualification requirements for personnel who review and evaluate integrity assessment results and information analysis?*

Assets Covered: 88982 (1019)

Result Notes Qualifications of Personnel Performing and Evaluating ILI

Qualifications of personnel reviewing and evaluating ILI results on pipelines owned by Tidewater shall meet Tidewater's qualification criteria, given below:

• Be suitably qualified based on experience and/or appropriate education and training

• Have 5 years' experience in ILI evaluation or be supervised by an individual with 5 years of such experience

• The ILI vendor shall qualify all personnel who will be analyzing inspection data or writing final inspection reports per provisions of ASNT ILI-PQ-2005 and shall submit documentation confirming qualifications to Tidewater

33. Question Result, ID, References Sat, AR.IA.REVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g), 195.452(h)(2))

Question Text *Do the records indicate that personnel who review and evaluate integrity assessment results and information analysis are qualified?*

Assets Covered 88982 (1019)

Result Notes The 2025 qualification records were provided by TDW for the April ILI run and were reviewed. The qualifications for individuals performing analyses for previous ILI runs were also reviewed.

34. Question Result, ID, References Sat, AR.IA.STANDARDS.P, 195.452(f)(5) (195.452(b)(6))

Question Text *Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing integrity assessments?*

Assets Covered 88982 (1019)

Result Notes This is contained in:

3.2 PRE-ASSESSMENT PREPARATION

General

All ILI activities shall be conducted using NACE SP0102-2017 – "In-line Inspection of Pipelines" as a guideline.

35. Question Result, ID, References Sat, AR.IA.STANDARDS.R, 195.452(l)(1)(ii) (195.452(b)(6))

Question Text *Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments?*

Assets Covered 88982 (1019)

Result Notes ILI preliminary report reviewed for 2025.

AR.IL: In-Line Inspection (Smart Pigs)

36. Question Result, ID, References Sat, AR.IL.ILIIMPLPERQUAL.P, 195.452(f)(5) (195.591)

Question Text *Does the process identify the qualification requirements for personnel who perform ILI (In Line Inspections)?*

Assets Covered 88982 (1019)

Result Notes Qualifications of Personnel Performing and Evaluating ILI

Qualifications of personnel reviewing and evaluating ILI results on pipelines owned by Tidewater shall meet Tidewater's qualification criteria, given below:

• Be suitably qualified based on experience and/or appropriate education and training

• Have 5 years' experience in ILI evaluation or be supervised by an individual with 5 years of such experience

• The ILI vendor shall qualify all personnel who will be analyzing inspection data or writing final inspection reports per provisions of ASNT ILI-PQ-2005 and shall submit documentation confirming qualifications to Tidewater

37. Question Result, ID, References: Sat, AR.IL.ILIIMPLPERQUAL.R, 195.591 (195.452(l)(1)(ii), 195.452(f)(5))

Question Text: *Do the records indicate that personnel who perform ILI (In Line Inspections) are qualified and certified (where applicable)?*

Assets Covered: 88982 (1019)

Result Notes: 2025 qualifications were reviewed for Tidewater personnel. Tim Berry EWN Launching ILI devices 029.1 exp 1/23/27 The ILI run was in April 2025.

38. Question Result, ID, References: Sat, AR.IL.ILIREVIEWQUAL.P, 195.452(f)(8) (195.452(g))

Question Text: *Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis?*

Assets Covered: 88982 (1019)

Result Notes: Qualifications of Personnel Performing and Evaluating ILI

Qualifications of personnel reviewing and evaluating ILI results on pipelines owned by Tidewater shall meet Tidewater's qualification criteria, given below:

• Be suitably qualified based on experience and/or appropriate education and training

• Have 5 years' experience in ILI evaluation or be supervised by an individual with 5 years of such experience

• The ILI vendor shall qualify all personnel who will be analyzing inspection data or writing final inspection reports per provisions of ASNT ILI-PQ-2005 and shall submit documentation confirming qualifications to Tidewater

39. Question Result, ID, References: Sat, AR.IL.ILIREVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g))

Question Text: *Do the records indicate that personnel who review and evaluate ILI integrity assessment results and information analysis are qualified?*

Assets Covered: 88982 (1019)

Result Notes: Tidewater provided training records for Marcus Hall Level 3 for MFL and Geometry. exp 11/1/2026 Certified 11/1/2023

Sophia Chernosky DEF1 exp 2/18/2028 and MFL1 exp 5/18/2028

Eric Johnson DEFIII exp 10/7/2025 and MFLIII exp 10/7/25 and XYZII 3/31/26 AOC (Abnormal Operating Condition) 5/19/26 (Liquid)

40. Question Result, ID, References: Sat, AR.IL.ILISPECS.P, 195.452(f)(5) (195.452(h), 195.452(j), 195.591)

Question Text: *Does the process include adequate ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization?*

Assets Covered: 88982 (1019)

Result Notes: In Tidewater IMP section 3.3

41. Question Result, ID, References: Sat, AR.IL.ILISPECS.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(h), 195.452(j), 195.591)

Question Text: *Do the records indicate that ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization were included and followed?*

Assets Covered: 88982 (1019)

Result Notes: Sizing Specifications reviewed. The 2025 run met the criteria with a single sensor loss. The data quality report was reviewed. 6.25% of the data was impacted by sensor loss, but it did not have an impact.

42. Question Result, ID, References: Sat, AR.IL.ILIVALIDATE.P, 195.452(f)(4) (195.452(j)(5)(i), 195.452(h), 195.591)

Question Text: *Does the process include the validation of ILI results?*

Assets Covered: 88982 (1019)

Result Notes 3.9 VALIDATION OF ILI RESULTS – VERIFICATION DIGS

The data resulting from the ILI survey must be validated before the data can be applied to the entire assessed segment by comparing ILI results to empirical, field measurements of the corresponding anomalies. Field examination activities verify the tool performance specifications for a range of anomaly types and are performed for the

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purpose of improving data analysis. A "verification dig" is an exploratory excavation with subsequent field examination and measurement of a detected anomaly.

Features should be selected for verification digs based on the type of ILI tool used for the inspection and the types of anomalies/features expected based on risk analysis. If there are any "Immediate Repair Conditions", it may be possible to use these as "verification digs". If there are no Immediate Repair Conditions identified, Tidewater will select anomalies for validation based on criteria or information such as known/suspected anomalies identified in previous ILI runs or knowledge of situational issues to determine the most representative anomalies to be physically inspected. If possible, at least two anomalies of each anomaly call out and possibly requiring remediation or monitoring should be identified as verification digs.

It is important to understand and accurately measure the extent of the anomaly (length, width, and depth) and how its interaction with adjacent anomalies is accounted for. The field examination and measurement, performed by personnel who are Operator Qualified in accordance with Tidewater's Operator Qualification (OQ) program, is then compared to the dimensions of the anomaly predicted by the ILI survey. The field measurement process used should be the most accurate possible for the type of anomaly being measured and can include the following:

43. Question Result, ID, References NA, AR.IL.ILIVALIDATE.R, 195.452(l)(1)(ii) (195.452(j)(5)(i), 195.452(f)(4), 195.452(h), 195.452(c)(1), 195.591, 195.452(c)(1)(i)(A))

Question Text *Do the records for validating ILI assessment results indicate that the process was implemented?*

Assets Covered 88982 (1019)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No validation digs during this inspection time period.

44. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.452(h))

Question Text *Does the process for evaluating ILI results include integration of all available information about the integrity of the pipeline?*

Assets Covered 88982 (1019)

Result Notes Integration with other data. This is contained in Section 3.12. The operator uses previous runs from ILI to compare. Several run comparisons were reviewed for data integration.

45. Question Result, ID, References NA, AR.IL.ILIINTEGRATION.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(h))

Question Text *Do the records indicate that the operator integrated other data/information when evaluating ILI tool data/results?*

Assets Covered 88982 (1019)

Result Notes No data integration for the 2025 run, but it will occur once the final is provided.

46. Question Result, ID, References NA, AR.IL.ILIIMPLEMENT.O, 195.452(b)(5)

Question Text *Have the ILI procedures been followed?*

Assets Covered 88982 (1019)

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

47. Question Result, ID, References NA, AR.IL.PETIONILI.P, 195.402(c)(3) (195.452(n))

Question Text *Beginning July 1, 2020, does the process include provisions to petition the PHMSA Administrator when IM-covered segments cannot be modified to accommodate ILI?*

Assets Covered 88982 (1019)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. The line has been able to accommodate ILI for some time.

48. Question Result, ID, References: NA, AR.IL.PETIONILI.R, 195.452(n)

Question Text: *Were petitions filed because pipelines could not be modified to accommodate ILI?*

Assets Covered: 88982 (1019)

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

AR.PA: Pipeline Assessments for Non-IM Onshore Pipelines

49. Question Result, ID, References: NA, AR.PA.METHOD.P, 195.402(c) (195.416(c), 195.591, 195.588(a), 195.588(b), 195.588(c))

Question Text: *Does the process specify assessment methods that are appropriate for the pipeline integrity threats?*

Assets Covered: 88982 (1019)

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

It is an IM covered pipeline.

50. Question Result, ID, References: NA, AR.PA.METHOD.R, 195.404(c) (195.416(c), 195.591, 195.588(a), 195.588(b), 195.588(c))

Question Text: *Do records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats?*

Assets Covered: 88982 (1019)

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

It is an IM covered pipeline.

51. Question Result, ID, References: NA, AR.PA.REVIEWQUAL.P, 195.402(c) (195.416(e), 195.591)

Question Text: *Does the process specify qualification requirements for a person who analyze the data obtained from an assessment?*

Assets Covered: 88982 (1019)

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

It is an IM covered pipeline.

52. Question Result, ID, References: NA, AR.PA.REVIEWQUAL.R, 195.404(c) (195.416(e), 195.591)

Question Text: *Do records indicate that personnel who analyze the data obtained from an assessment are qualified?*

Assets Covered: 88982 (1019)

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

It is an IM covered pipeline.

53. Question Result, ID, References: NA, AR.PA.STANDARDS.P, 195.402(c) (195.591)

Question Text: *Does the process to perform pipeline assessments incorporate required industry practices in performing pipeline assessments and identifying anomalies?*

Assets Covered: 88982 (1019)

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

54. Question Result, ID, References: NA, AR.PA.STANDARDS.R, 195.404(c) (195.591, 195.416(c))

Question Text: *Do records indicate that pipeline in-line inspection assessments used industry practices in performing pipeline assessments and identifying anomalies?*

Assets Covered: 88982 (1019)

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

55. Question Result, ID, References: NA, AR.PA.DISCOVERY.P, 195.402(c) (195.416(f), 195.401(b)(1), 195.416(h))

Question Text: *Does the pipeline assessment process define "discovery of condition" and the required time frame for identification of anomalies to be remediated?*

Assets Covered 88982 (1019)

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

It is an IM covered pipeline.

56. Question Result, ID, References NA, AR.PA.DISCOVERY.R, 195.404(c) (195.416(f), 195.401(b)(1), 195.416(h))

Question Text *Do records indicate that "discovery of condition" results for all anomalies occurred promptly, but no later than 180 days after the completion of the pipeline assessment?*

Assets Covered 88982 (1019)

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

It is an IM covered pipeline.

57. Question Result, ID, References NA, AR.PA.CRACKREMEDIATION.P, 195.402(c) (195.416, 195.401(b)(1), 195.591)

Question Text *If the pipeline is susceptible to cracking, does the process include criteria for remedial actions to address integrity issues raised by the assessment method?*

Assets Covered 88982 (1019)

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

It is an IM covered pipeline.

58. Question Result, ID, References NA, AR.PA.CRACKREMEDIATION.R, 195.404(c) (195.416(g), 195.416(h), 195.401(b)(1), 195.591)

Question Text *If the pipeline is susceptible to cracking, do records indicate that the remedial actions have been documented?*

Assets Covered 88982 (1019)

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

It is an IM covered pipeline.

AR.PTI: Integrity Assessment Via Pressure Test

59. Question Result, ID, References NA, AR.PTI.PRESSTESTACCEP.P, 195.452(f)(5) (195.304, 195.305, 195.306, 195.308, 195.452(j)(5)(ii))

Question Text *Does the process define acceptance criteria for a successful pressure test?*

Assets Covered 88982 (1019)

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

60. Question Result, ID, References NA, AR.PTI.PRESSTESTCORR.P, 195.452(f)(3) (195.452(g)(3))

Question Text *Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?*

Assets Covered 88982 (1019)

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

61. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.O, 195.452(b)(5) (195.452(c)(1)(i)(B), 195.452(j)(5)(ii), 195.304)

Question Text *Was the pressure test conducted in accordance with the procedures?*

Assets Covered 88982 (1019)

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

62. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.R, 195.310 (195.452(f)(2), 195.452(f)(5), 195.452(c), 195.452(l)(1)(ii))

Question Text *Do the pressure test records indicate compliance with Part 195, Subpart E?*

Assets Covered 88982 (1019)

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

63. Question Result, ID, References NA, AR.PTI.PRESSTESTCORR.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g)(3))

Question Text *When pressure testing was used as the integrity assessment method, do the records indicate that the effectiveness of the corrosion control program was documented?*

Assets Covered 88982 (1019)

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

AR.PTIRB: Integrity Assessment Via Pressure Test - Risk Based Alternative

64. Question Result, ID, References NA, AR.PTIRB.RISKBASEDALT.P, 195.303(a) (195.303(g))

Question Text *If applicable per 195.303, does the process include the review of risk classification of pipeline segments which have not been pressure tested (Risk Classification A)?*

Assets Covered 88982 (1019)

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

65. Question Result, ID, References NA, AR.PTIRB.RISKBASEDALT.R, 195.303(h) (195.303(g))

Question Text *If applicable per 195.303, do the records indicate that the risk classification of pipeline segments not pressure tested have been reviewed?*

Assets Covered 88982 (1019)

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

AR.OT: Other Technology

66. Question Result, ID, References NA, AR.OT.OTPLAN.P, 195.452(f)(5) (195.452(c)(1)(i)(D), 195.452(j)(5)(iv), 195.416(d))

Question Text *If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe?*

Assets Covered 88982 (1019)

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

67. Question Result, ID, References NA, AR.OT.OTPLAN.R, 195.452(l)(1)(ii) (195.452(j)(5)(iv), 195.452(f)(5), 195.452(c)(1)(i)(D), 195.416(d))

Question Text *Do the records indicate that the Other Technology integrity assessments were performed in accordance with procedures and vendor recommendations?*

Assets Covered 88982 (1019)

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

68. Question Result, ID, References NA, AR.OT.OTPLAN.O, 195.452(b)(5) (195.416(d))

Question Text *Has the process for the use of "Other Technology" been followed?*

Assets Covered 88982 (1019)

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

69. Question Result, ID, References NA, AR.OT.ASSESSMENTREVIEW.P, 195.452(f)(8) (195.452(j)(5), 195.416(d))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology?*

Assets Covered 88982 (1019)

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

70. Question Result, ID, References NA, AR.OT.ASSESSMENTREVIEW.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(j)(5), 195.416(d))

Question Text *Do the records pertaining to the selected integrity assessments indicate that personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology are qualified?*

Assets Covered 88982 (1019)

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

AR.RCHCA: Repair Criteria (HCA)

71. Question Result, ID, References: Sat, AR.RCHCA.DISCOVERY.P, 195.452(f)(4) (195.452(h)(2))

Question Text: *Does the integrity assessment process define "discovery of condition" and the required time frame for anomalies in a pipeline segment that can affect an HCA?*

Assets Covered: 88982 (1019)

Result Notes: 3.10 DISCOVERY OF CONDITION

For the purposes of Tidewater's Integrity Management, Discovery of a Condition occurs when Tidewater has adequate information about the condition to determine that the condition presents a potential threat to the integrity of the pipeline.

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The regulatory time clock for Discovery of Condition begins from the date of Tidewater's acceptance of data. The acceptance of data can occur piecemeal; the accepted Preliminary Report identifies all Immediate Repair Conditions, and as such, the Discovery of Condition for Immediate Repairs is upon Tidewater's acceptance of the Preliminary Report. However, during further data analysis by the ILI Vendor, the regulatory time clock for "Discovery of Condition" can be re-set upon re-interpretation (possibly re-categorization as either 60-day or 180-day repairs) of the anomalies included in the Preliminary Report.

Tidewater shall make every effort to obtain sufficient information about a condition to make the determination promptly, but no later than 180 days, after the completion of the integrity assessment. In some cases discovery occurs when ILI data is integrated with other data such as previous assessments, historical data, and corrosion reports. Adequate information may be obtained through a review of ILI data alone or in conjunction with other inspection data, such as coating inspection, close interval survey records, visual inspection of the area, and, if necessary, consultation with qualified, third-party consultants.

The date on which discovery is established, or the "Date of Discovery", is documented in the Continuing Assessment Plan and is included in the Integrity Assessment Report.

Time frames are also contained in Section 4.4. It describes the immediate repair conditions.

72. Question Result, ID, References: Sat, AR.RCHCA.IMSCHEDULE.P, 195.452(f)(4) (195.452(h)(3), 195.452(h)(4))

Question Text: *Does the process include developing a prioritized schedule for evaluating and remediating all identified repair conditions consistent with the repair criteria and within the time frames found in 195.452(h)(4)?*

Assets Covered: 88982 (1019)

Result Notes: Time frames are contained in Section 4.4.

4.4 SPECIAL REQUIREMENTS FOR SCHEDULING REMEDIATION

A. Immediate Repair Conditions

The conditions listed in Table 1-1 are to be considered immediate repair conditions. To maintain safety, the operating pressure shall be either temporarily reduced (per Section 4.2) or shut down until a repair is completed of

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these conditions. Tidewater shall calculate the temporary operating pressure using the formula in section 451.6.2.2(b) of ANSI/ASME B31.4.

Table 1-1 – Immediate Repair Conditions

A. Metal loss greater than 80% of nominal wall regardless of dimensions.

B. A calculation of the remaining strength of the pipe shows a predicted burst pressure less than the established maximum operating pressure at the location of the anomaly.

C. A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) that has any indication of metal loss, cracking or a stress riser.

D. A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) with a depth greater than 6% of the nominal pipe diameter.

E. An anomaly that in the judgment of the person designated by Tidewater to evaluate the assessment results requires immediate action.

B. 60-Day Repair Conditions

Except for the conditions listed in Table 1-1, the conditions listed in Table 1-2 are to be considered 60-day repair conditions. Tidewater shall schedule evaluation and remediation of these conditions within 60 days of discovery of the condition.

Table 1-2 – 60-Day Repair Conditions

A. A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) with a depth greater than 3% of the pipeline diameter (greater than 0.250 inches in depth for a pipeline diameter less than Nominal Pipe Size (NPS) 12).

B. A dent located on the bottom of the pipeline that has any indication of metal loss, cracking, or a stress riser.

C. 180-Day Repair Conditions

Except for the conditions listed in Tables 1-1 and 1-2, the conditions listed in Table 1-3 are to be considered 180-day repair conditions. Tidewater shall schedule evaluation and remediation of these conditions within 180 days of discovery of the condition.

Table 1-3 – 180-Day Repair Conditions

A. A dent with a depth greater than 2% of the pipeline's diameter (0.250 inches in depth for a pipeline diameter less than NPS 12) that affects pipe curvature at a girth weld or a longitudinal seam weld.

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B. A dent located on the top of the pipeline (above 4 and 8 o'clock position) with a depth greater than 2% of the pipelines diameter (0.250 inches in depth for a pipeline diameter less than NPS 12).

C. A dent located on the bottom of the pipeline with a depth greater than 6% of the pipeline's diameter.

D. A calculation of the remaining strength of the pipe shows an operating pressure that is less than the current established maximum operating pressure at the location of the anomaly (refer to ASME/ANSI B31G or AGA Pipeline Research Committee Project PR-3-805 for applicable calculation methods).

E. An area of general corrosion with a predicted metal loss greater than 50% of nominal wall.

F. Predicted metal loss greater than 50% of nominal wall that is located at a crossing of another pipeline, or is in an area with widespread circumferential corrosion, or is in an area that could affect a girth weld.

G. A potential crack indication that when excavated is determined to be a crack.

H. Corrosion of or along a longitudinal seam weld.

I. A gouge or groove greater than 12.5% of nominal wall.

D. Other Repair Conditions

In addition to the conditions listed in Tables 1-1, 1-2, and 1-3, Tidewater shall evaluate any condition identified by an integrity assessment or information analysis that could impair the integrity of the

pipeline, and as appropriate, schedule the condition for remediation. These conditions may include, but are not limited to, the following:

Table 1-4 – Other Repair Conditions

A. Joints that exhibit a relatively significant change since the previous assessment, such as maximum metal loss depth or number of top-side dents.

B. Girth welds with a relatively high density of metal loss.

C. Significant metal loss located in or near a casing, a crossing of another pipeline, or an area with potential cathodic protection issues.

D. Narrow and axially-oriented metal loss

73. Question Result, ID, References: Sat, AR.RCHCA.IMSCHEDULE2.P, 195.402(c)(3) (195.401(b)(3))

Question Text: *For assets covered by the IM program, does the process require that the risk to people, property, and the environment be considered in prioritizing the correction of conditions?*

Assets Covered: 88982 (1019)

Result Notes: Tidewater IMP section 4.4, There is also detail in Section 4.3

74. Question Result, ID, References: NA, AR.RCHCA.DISCOVERY.R, 195.452(l)(1)(ii) (195.452(h)(2), 195.452(f)(4))

Question Text: *Do the records indicate that "discovery of condition" results for all anomalies occurred promptly, but no later than 180 days after the completion of the integrity assessment?*

Assets Covered: 88982 (1019)

Result Notes: No such relevant facilities/equipment existed in the scope of inspection review. No immediate or 180 day conditions from the April 2025 run.

75. Question Result, ID, References: Sat, AR.RCHCA.IMPRC.P, 195.452(f)(4) (195.452(h)(1), 195.452(h)(4))

Question Text: *Does the process include criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?*

Assets Covered: 88982 (1019)

Result Notes: Section 4.0 and 4.4 discusses pressure reduction or or shutdown.

76. Question Result, ID, References: NA, AR.RCHCA.REMEDIATION.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4), 195.452(b)(5), 195.569)

Question Text: *Do records indicate that anomaly remediation and documentation of remediation was performed in accordance with the process?*

Assets Covered: 88982 (1019)

Result Notes: No such relevant facilities/equipment existed in the scope of inspection review. No repairs during the inspection time period.

77. Question Result, ID, References: NA, AR.RCHCA.IMPRC.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(1), 195.452(h)(4))

Question Text: *Do records indicate that prompt action was taken to address all anomalous conditions discovered through the integrity assessment or information analysis?*

Assets Covered: 88982 (1019)

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

78. Question Result, ID, References: NA, AR.RCHCA.REMEDIATION.O, 195.452(b)(5) (195.402(a), 195.402(c)(14), 195.422(a), 195.569, 195.589(c))

Question Text: *From an observation of a remediation or repair at an excavation site, are anomaly remediation activities adequate, performed in accordance with the categorized remediation/repair schedule, and documented?*

Assets Covered: 88982 (1019)

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

79. Question Result, ID, References: Sat, AR.RCHCA.REMEDIATION.P, 195.452(f)(4) (195.452(h)(1), 195.422(b))

Question Text *Does the process require that remedial actions be performed in a manner that addresses the integrity issues raised by the assessment methods used and information analysis?*

Assets Covered 88982 (1019)

Result Notes Section 4.0 contains the procedure.

80. Question Result, ID, References Sat, AR.RCHCA.PRESSREDUCE.P, 195.452(f)(4) (195.428, 195.452(h)(1)(i), 195.452(h)(1)(ii))

Question Text *Does the process for pressure reduction meet the code requirements?*

Assets Covered 88982 (1019)

Result Notes This is in Section 4.2 and discusses the steps for temporary and long term pressure reduction.

81. Question Result, ID, References NA, AR.RCHCA.PRESSREDUCE.R, 195.452(l)(1)(ii) (195.404(a), 195.404(b), 195.452(h)(1)(ii), 195.452(h)(4)(i), 195.55(a), 195.56)

Question Text *Do the integrity assessment records indicate that the pressure reduction taken was acceptable and promptly implemented?*

Assets Covered 88982 (1019)

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

82. Question Result, ID, References NA, AR.RCHCA.IMSCHEDULE.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4))

Question Text *Do the records indicate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(4)?*

Assets Covered 88982 (1019)

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

83. Question Result, ID, References NA, AR.RCHCA.IMSCHEDULE2.R, 195.401(b)(3) (195.452(l)(1)(ii), 195.404(c)(1), 195.589(c))

Question Text *Do records demonstrate that the risk to people, property, and the environment was considered when prioritizing the correction of conditions occurring on assets covered by the IM program?*

Assets Covered 88982 (1019)

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

84. Question Result, ID, References NA, AR.RCHCA.CRACKREMEDIATION.P, 195.452(f)(4) (195.452(h), 195.588(c))

Question Text *If the pipeline is susceptible to cracking, does the process include criteria for remedial actions to address integrity issues raised by the assessment method?*

Assets Covered 88982 (1019)

Result Notes This is N/A, but there is a section to address under section 4.5.

85. Question Result, ID, References NA, AR.RCHCA.CRACKREMEDIATION.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(4)(iii)(G), 195.588(c))

Question Text *If the pipeline is susceptible to cracking, do the records indicate that the remedial actions have been documented?*

Assets Covered 88982 (1019)

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

AR.RCOM: Repair Criteria (O and M)

86. Question Result, ID, References NA, AR.RCOM.REPAIRNONHCA.P, 195.402(c)(3) (195.401(b)(1), 195.422(a), 195.422(b), 195.585(a), 195.585(b), 195.401(b)(3))

Question Text *For non-HCA pipeline segments, do the integrity assessment and maintenance processes include adequate criteria for determining the need for, and timeliness of, pipeline defect repairs?*

Assets Covered 88982 (1019)

Result Notes The whole system is in an HCA.

87. Question Result, ID, References Sat, AR.RCOM.REPAIRNONHCA.R, 195.404(c) (195.585(a), 195.585(b), 195.422(a), 195.422(b), 195.401(b)(1), 195.401(b)(3))

Question Text *For non-HCA pipeline segments, do the records for selected ILI and remediation projects indicate that conditions were repaired that posed a threat to pipeline integrity?*

Assets Covered 88982 (1019)

Result Notes The whole system is in an HCA.

88. Question Result, ID, References: NA, AR.RCOM.REMEDIATIONOM.O, 195.422(a) (195.422(b), 195.401(b)(1), 195.402(a), 195.402(c)(14), 195.579(c), 195.569)
Question Text: *Do the performance and documentation of remediation meet procedural requirements for non-IM repairs?*
Assets Covered: 88982 (1019)
Result Notes: No such activity/condition was observed during the inspection.

AR.RMP: Repair Methods and Practices

89. Question Result, ID, References: Sat, AR.RMP.SAFETY.P, 195.402(c)(14) (195.422(a), 195.452(h)(1))
Question Text: *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*
Assets Covered: 88982 (1019)
Result Notes: Section 4.5

90. Question Result, ID, References: NA, AR.RMP.SAFETY.O, 195.422(a) (195.402(c)(14), 195.452(h)(1))
Question Text: *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?*
Assets Covered: 88982 (1019)
Result Notes: No such activity/condition was observed during the inspection.

91. Question Result, ID, References: Sat, AR.RMP.METHOD.P, 195.402(c)(3) (195.452(h)(1), 195.585)
Question Text: *Does the process identify permissible repair methods for each type of defect?*
Assets Covered: 88982 (1019)
Result Notes: Tidewater IMP 4.5 references O&M Section 500 for the permissible repairs.

92. Question Result, ID, References: NA, AR.RMP.METHOD.R, 195.404(c)(1) (195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1), 195.401(b)(2))
Question Text: *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review. No repairs since the last inspection.

93. Question Result, ID, References: NA, AR.RMP.REPAIRQUAL.R, 195.505(b) (195.507(a), 195.505(c), 195.452(h)(1), 195.452(b)(5))
Question Text: *From the records review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

94. Question Result, ID, References: NA, AR.RMP.PIPECONDITION.R, 195.404(c)(1) (195.404(c)(2), 195.452(l)(1)(ii))
Question Text: *Do the repair records document all the information needed to understand the conditions of the pipe and its environment and also provide the information needed to support the Integrity Management program, when applicable?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

95. Question Result, ID, References: NA, AR.RMP.REPLACESTD.R, 195.404(a)(1) (195.422(b))
Question Text: *Were all replaced line pipe and/or components designed and constructed as required by Part 195?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

96. Question Result, ID, References: NA, AR.RMP.PIPEMOVE.R, 195.424(a) (195.424(b), 195.424(c))
Question Text: *From a review of selected records, were pipeline movements performed in accordance with 195.424?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

97. Question Result, ID, References: NA, AR.RMP.WELDERQUAL.R, 195.214(a) (195.214(b), 195.222(a), 195.222(b))
Question Text: *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

98. Question Result, ID, References: NA, AR.RMP.WELDQUAL.R, 195.226(a) (195.226(b), 195.226(c), 195.230(a), 195.230(b), 195.230(c))
Question Text: *From the review of the results of integrity assessment and remediation projects, were defects on new welds repaired in accordance with §195.226 or §195.230?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

99. Question Result, ID, References: NA, AR.RMP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234(a), 195.234(b), 195.234(c), 195.234(d), 195.234(e))
Question Text: *From the review of the results of remediation projects, were new welds inspected and examined in accordance with §195.228 or §195.234?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

100. Question Result, ID, References: NA, AR.RMP.CRACKNDE.P, 195.452(f)(4) (195.452(h))
Question Text: *Does the process include appropriate NDE method(s) and other information gathering during the evaluation of cracks and cracking?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

101. Question Result, ID, References: NA, AR.RMP.CRACKNDE.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h), 195.404(c))
Question Text: *Do the records indicate that appropriate NDE method(s) were used and other information was gathered related to the evaluation of cracking?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

AR.SP: Special Permits

102. Question Result, ID, References: NA, AR.SP.METHODSP.P, 190.341(d) (195.452(j)(5))
Question Text: *If a pipeline operates under a special permit, has the process been modified to incorporate the requirements of the permit for the selected integrity assessment method(s)?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

103. Question Result, ID, References: NA, AR.SP.METHODSP.R, 190.341(d) (195.452(j)(5))
Question Text: *If a pipeline is operated under a special permit, from a review of selected records, were any one of the four accepted integrity assessment methods performed?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

104. Question Result, ID, References: NA, AR.SP.REPAIRSP.P, 190.341(d)
Question Text: *If a pipeline is operated under a special permit, has the process been modified to incorporate the requirements of the permit for required repairs?*
Assets Covered: 88982 (1019)
Result Notes: No such event occurred, or condition existed, in the scope of inspection review.

105. Question Result, ID, References: NA, AR.SP.REPAIRSP.R, 190.341(d)

Question Text *If a pipeline is operated under a special permit, from a review of selected records, were repairs performed in accordance with the requirements of the permit?*

Assets Covered 88982 (1019)

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

DC.CO: Construction

106. Question Result, ID, References Sat, DC.CO.VALVEPROTECT.O, 195.258(a)

Question Text *Are valves accessible to authorized employees and protected from damage or tampering?*

Assets Covered 88982 (1019)

Result Notes The facility is a MARSEC facility and it is secure.

107. Question Result, ID, References NA, DC.CO.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f), 195.260(g))

Question Text *Are valves located as specified by §195.260?*

Assets Covered 88982 (1019)

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

These lines are less than 1 mile and do not require additional valves.

The pipeline system is 4,903 feet in length.

DC.MO: Maintenance and Operations

108. Question Result, ID, References Sat, DC.MO.SAFETY.P, 195.402(a) (195.422(a), 195.402(c)(14))

Question Text *Does the process ensure that pipeline maintenance construction and testing activities are made in a safe manner and are made so as to prevent damage to persons and property?*

Assets Covered 88982 (1019)

Result Notes This in the O&M Manual on 503.2. It discusses safety procedures in detail.

TDC.650REGS: New API 650 Tanks - Part 195 Requirements

109. Question Result, ID, References Sat, TDC.650REGS.TANKSPEC.P, 195.132(b)(3) (API Std 650)

Question Text *Does the process for new aboveground atmospheric breakout tanks require tank design and construction to meet the requirements of 195.132(b)(3)?*

Assets Covered 88982 (1019)

Result Notes This is in O&M Section 205

110. Question Result, ID, References Sat, TDC.650REGS.TANKSPEC.R, 195.132(b)(3) (API Std 650)

Question Text *Do the design records and drawings indicate new aboveground atmospheric breakout tanks are designed and constructed to the specifications required by 195.132(b)(3)?*

Assets Covered 88982 (1019)

Result Notes No new tanks since 2018.

111. Question Result, ID, References Sat, TDC.650REGS.REPAIRSPEC.P, 195.205(b)(1) (API Std 650, API Std 653)

Question Text *Are breakout tanks required to be repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?*

Assets Covered 88982 (1019)

Result Notes This is in O&M Section 205.2.

112. Question Result, ID, References Sat, TDC.650REGS.CPDESIGN.P, 195.565 (195.563(d), 195.132(b)(3), API RP 651, Section 6.3.4, API RP 651, Section 6.3.5, API RP 651, Section 7.2.1, API RP 651, Section 11.4)

Question Text *Does the process for new aboveground breakout tanks require cathodic protection system design to conform with API 651, Sections 6.2 and 6.3, as required by 195.565?*

Assets Covered 88982 (1019)

Result Notes This is in O&M Section 400.1g.

113. Question Result, ID, References Sat, TDC.650REGS.CPDESIGN.O, 195.565 (195.563(d), API RP 651, Section 6.3.4, API RP 651, Section 6.3.5, API RP 651, Section 7.2.1)

Question Text *Do field observations confirm new breakout tanks have cathodic protection installed in accordance with 195.565?*

Assets Covered 88982 (1019)

Result Notes CP was adequate on the tanks reviewed. Form "R", the field notes form, has been attached.

114. Question Result, ID, References Sat, TDC.650REGS.IMPOUNDMENT.P, 195.264(a) (195.264(b), 195.264(c), 195.264(d), 195.264(e), NFPA 30)

Question Text *Does the process for new aboveground breakout tanks require impoundment(s) to meet the impoundment requirements of 195.264 in the event of tank spillage or failure?*

Assets Covered 88982 (1019)

Result Notes This is in O&M Section 205.3.1.

TDC.650HYDRO: New API 650 Tanks - Hydrostatic Testing

115. Question Result, ID, References Sat, TDC.650HYDRO.HYDROTEST.P, 195.307(c) (195.310(a), 195.310(b), 195.132(b)(3), API 650, Section 7.3.5, API 650, Section 7.3.6, API 650, Appendix L.3, Line 14)

Question Text *Does the process for new aboveground breakout tanks require hydrostatic leak testing of tanks in accordance with 195.307(c)?*

Assets Covered 88982 (1019)

Result Notes This is in O&M Section 205.5

TDC.620REGS: New API 620 Tanks (Low Pressure) - Part 195 Requirements

116. Question Result, ID, References NA, TDC.620REGS.REPAIRSPEC.P, 195.205(b)(2) (API Std 620)

Question Text *Are breakout tanks required to be repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(2)?*

Assets Covered 88982 (1019)

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

117. Question Result, ID, References NA, TDC.620REGS.REPAIRSPEC.R, 195.205(b)(2) (API Std 620)

Question Text *Do records indicate breakout tanks were repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(2)?*

Assets Covered 88982 (1019)

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

FS.TANKS: Tanks and Storage - Inspection

118. Question Result, ID, References NA, FS.TANKS.NONSTDINSP.R, 195.404(c)(3) (195.432(a))

Question Text *For breakout tanks not being inspected to API 653 or API 510, do the records verify the interval and method used for performing tank inspections?*

Assets Covered 88982 (1019)

Result Notes Tanks are inspected to 653

119. Question Result, ID, References Sat, FS.TANKS.INSRVCINSP.P, 195.402(c)(3) (195.432(b), API 653, Section 6.3.1)

Question Text *Does the process describe the interval and method for performing routine in-service inspections (monthly) of steel atmospheric or low pressure breakout tanks?*

Assets Covered 88982 (1019)

Result Notes Checked 2023 records

Ethan Ireland OQ records reviewed for 2023 CT 027.1 Exp 4/7/2024

Pat Barron OQ records reviewed for 2024 2023 1/13 - 8 24/2025

120. Question Result, ID, References: Sat, FS.TANKS.INSRVCINSP.R, 195.432(b) (195.404(c)(3), API 653, Section 6.3.1)

Question Text: *Do records document that steel atmospheric or low pressure breakout tanks have received monthly in-service inspections and that deficiencies found during inspections have been documented?*

Assets Covered: 88982 (1019)

Result Notes: Looked at records from 2022-2024.

121. Question Result, ID, References: Sat, FS.TANKS.EXTRNLINSP.P, 195.402(c)(3) (195.432(b))

Question Text: *Does the process describe the interval and method for performing external in-service inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?*

Assets Covered: 88982 (1019)

Result Notes: O&M 205.9

122. Question Result, ID, References: Sat, FS.TANKS.EXTRNLINSP.R, 195.432(b) (195.404(c)(3), API 653 section 6.3.2)

Question Text: *Do records document that steel atmospheric or low pressure breakout tanks have received API 653 external inspections at the required intervals and that deficiencies documented during inspections have been corrected within a reasonable time frame?*

Assets Covered: 88982 (1019)

Result Notes: (2025) **4**, No issues

(2024) 24, **32**, 84, 85, **86**, 87 External 653 Tank 32 prior was checked for 2019 date. Tanks 86 no mandatory. 2029 first 10 year

(2023) 14

123. Question Result, ID, References: Sat, FS.TANKS.EXTRNLINSPUT.P, 195.402(c)(3) (195.432(b), API 653 Section 6.3.3)

Question Text: *Does the process describe the interval and method for performing external, ultrasonic shell thickness inspections of breakout tanks that are steel (atmospheric or low pressure) tanks in accordance with API 653, Section 6.3.3?*

Assets Covered: 88982 (1019)

Result Notes: O&M 205.9(c)

124. Question Result, ID, References: Sat, FS.TANKS.EXTRNLINSPUT.R, 195.432(b) (195.404(c)(3), API 653, Section 6.3.3)

Question Text: *Do records document that steel atmospheric or low pressure breakout tanks have received ultrasonic shell thickness inspections, in accordance with API 653, at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered: 88982 (1019)

Result Notes: This is done during the internal inspection for Tank 22 in 2024

125. Question Result, ID, References: Sat, FS.TANKS.INTINSPOOS.P, 195.402(c)(3) (195.432(b))

Question Text: *Does the process describe the interval and method for performing internal (out of service) inspections of breakout tanks that are steel (atmospheric or low pressure) tanks in accordance with API 653, Section 6.4?*

Assets Covered: 88982 (1019)

Result Notes: O&M 205.9d

126. Question Result, ID, References: Sat, FS.TANKS.INTINSPOOS.R, 195.404(c)(3) (195.432(b))

Question Text: *Do records document that steel atmospheric or low pressure breakout tanks have received formal internal inspections, in accordance with API 653, at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered: 88982 (1019)

Result Notes Tank 29 in 6/2023 had a shoe seal replacement. Action items included IFR seal system pontoons, CP isolation pads.

Tank 30

127. Question Result, ID, References Sat, FS.TANKS.INSPRECORDS.P, 195.402(c)(3) (195.432(b), API 653 Section 6.8)

Question Text *Does the operator's process require that all tank construction records, inspection history and repair/alteration history is maintained for the life of the tank?*

Assets Covered 88982 (1019)

Result Notes IMP 4.5

128. Question Result, ID, References Sat, FS.TANKS.INSPRECORDS.R, 195.432(b) (195.404(c)(3), API 653, Section 6.8)

Question Text *Does the operator have all of the construction records, inspection history, and repair/alteration history associated with each breakout tank?*

Assets Covered 88982 (1019)

Result Notes Records go back pretty very far

129. Question Result, ID, References Sat, FS.TANKS.INSPREPORTS.P, 195.402(c)(3) (195.432(b), API 653 Section 6.9)

Question Text *Does the operator's process require that all Reports required by API 653 certified inspectors, the repair recommendations, and the disposition of the recommendations are to be maintained for the life of the tank?*

Assets Covered 88982 (1019)

Result Notes Section 703 O&M.

130. Question Result, ID, References Sat, FS.TANKS.INSPREPORTS.R, 195.432(b) (195.404(c)(3), API 653, Section 6.9)

Question Text *Does the operator have all of the inspection reports, repair recommendations, and repair/alteration history associated with each breakout tank?*

Assets Covered 88982 (1019)

Result Notes Several records reviewed.

131. Question Result, ID, References NA, FS.TANKS.EXTINSP2510.P, 195.402(c)(3) (195.432(c), API 2510, API 510)

Question Text *For API 2510 pressure tanks, does the process describe the interval and method for performing external inspections of in-service pressure tanks built to API Standard 2510?*

Assets Covered 88982 (1019)

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

132. Question Result, ID, References NA, FS.TANKS.EXTINSP2510.R, 195.404(c)(3) (195.432(c), API 2510, API 510)

Question Text *For API 2510 pressure tanks, do records document that in-service pressure tanks built to API Standard 2510 have received external inspections at the required intervals and that deficiencies found have been corrected?*

Assets Covered 88982 (1019)

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

133. Question Result, ID, References NA, FS.TANKS.INTINSP2510.P, 195.402(c)(3) (195.432(c), API 510)

Question Text *For API 2510 pressure tanks, does the process describe the interval and method for performing internal inspections in accordance with API 510?*

Assets Covered 88982 (1019)

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

134. Question Result, ID, References NA, FS.TANKS.INTINSP2510.R, 195.404(c)(3) (195.432(c), API 510)

Question Text *For API 2510 pressure tanks, do records document that internal inspections were performed at the required intervals and that deficiencies found have been corrected in accordance with API 510?*

Assets Covered 88982 (1019)

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

FS.FG: Facilities General

135. Question Result, ID, References: Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: PD.SN)
Question Text: *Are facilities adequately protected from vandalism and unauthorized entry?*
Assets Covered: 88982 (1019)
Result Notes: The facility is a MARSEC facility and it is secure.

136. Question Result, ID, References: Sat, FS.FG.IGNITION.O, 195.438 (also presented in: PD.SN)
Question Text: *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*
Assets Covered: 88982 (1019)
Result Notes: There is adequate signage that warn against ignition sources.

137. Question Result, ID, References: Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: PD.SN)
Question Text: *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*
Assets Covered: 88982 (1019)
Result Notes: There are suitable contact information signs around the facility. I called one of the numbers and it is current.

138. 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: 88982 (1019)
Result Notes: O&M 211.2

139. 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: 88982 (1019)
Result Notes: Smoking is banned.

Hot work permit required.

140. 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: 88982 (1019)
Result Notes: O&M 212

141. Question Result, ID, References: Sat, FS.FG.FIREPROT.P, 195.402(c)(3) (195.430(a), 195.430(b), 195.430(c))
Question Text: *Does the process require firefighting equipment at pump station/breakout tank areas?*
Assets Covered: 88982 (1019)
Result Notes: O&M 210

142. Question Result, ID, References: Sat, FS.FG.FIREPROT.O, 195.430(a) (195.430(b), 195.430(c), 195.262(e))
Question Text: *Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly?*
Assets Covered: 88982 (1019)
Result Notes: Fire protection equipment was well maintained in the breakout tanks areas. There were no issues with the condition of the equipment. It was not tested for function while I was on site.

FS.TS: Tanks and Storage

143. Question Result, ID, References: NA, FS.TS.PRVTESTHVL.P, 195.402(c)(3) (195.428(b))

Question Text: *Does the process require inspection and testing of pressure relief valves on HVL pressure breakout tanks at intervals not exceeding five (5) years?*

Assets Covered: 88982 (1019)

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

144. Question Result, ID, References: NA, FS.TS.PRVTESTHVL.R, 195.404(c)(3) (195.428(b))

Question Text: *Do records document testing and inspection of relief valves on HVL pressure breakout tanks at intervals not exceeding five (5) years?*

Assets Covered: 88982 (1019)

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

145. Question Result, ID, References: Sat, FS.TS.OVERFILL.P, 195.402(c)(3) (195.428(a), 195.428(c), 195.428(d), API 2350)

Question Text: *Does the process require adequate testing and inspection of overfill devices on aboveground breakout tanks at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered: 88982 (1019)

Result Notes: O&M 205.8(b)

146. Question Result, ID, References: Sat, FS.TS.OVERFILL.R, 195.404(c)(3) (195.428(a), 195.428(c), 195.428(d), API 2350)

Question Text: *Do records confirm testing and inspection of overfill devices on non-HVL breakout tanks was performed at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered: 88982 (1019)

Result Notes: Reviewed overfill protection for 2022-2025.

147. Question Result, ID, References: NA, FS.TS.OVERFILLHVL.P, 195.402(c)(3) (195.428(a), 195.428(c), 195.428(d))

Question Text: *Does the process require adequate testing and inspection of overfill devices on HVL pressure breakout tanks at intervals not to exceed 7-1/2 months, but at least twice each calendar year?*

Assets Covered: 88982 (1019)

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

148. Question Result, ID, References: NA, FS.TS.OVERFILLHVL.R, 195.402(c)(3) (195.428(a), 195.428(c), 195.428(d), API 510)

Question Text: *Do the records confirm adequate testing and inspection of overfill devices on HVL pressure breakout tanks was performed at intervals not to exceed 7-1/2 months, but at least twice each calendar year?*

Assets Covered: 88982 (1019)

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

149. Question Result, ID, References: Sat, FS.TS.OVERFILL.O, 195.428(d) (195.428(c), API 2510)

Question Text: *Do selected overfill protection systems on breakout tanks function properly and are they in good mechanical condition?*

Assets Covered: 88982 (1019)

Result Notes: Overfill protection systems for the high and high high alarms were checked for function on selected tanks. Alarms and communication to the control room functioned properly.

150. Question Result, ID, References: Sat, FS.TS.IGNITION.P, 195.402(c)(3) (195.405(a), API RP2003)

Question Text: *Does the process describe how the operator protects against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities of aboveground breakout tanks?*

Assets Covered: 88982 (1019)

Result Notes: O&M 205.6.1

151. Question Result, ID, References: Sat, FS.TS.FLOATINGROOF.P, 195.402(c)(3) (195.405(b), API Publication 2026)

Question Text: *Does the access/egress process for floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance or repair activities of in-service tanks indicate that the operator has reviewed and considered the potentially hazardous conditions, safety practices and procedures in API Publication 2026?*

Assets Covered 88982 (1019)

Result Notes O&M 205.6.3

152. Question Result, ID, References NA, FS.TS.FLOATINGROOF.R, 195.404(c) (195.405(b), API Publication 2026)

Question Text *Do records indicate access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance, or repair activities of in-service tanks was performed consistent with API Publication 2026?*

Assets Covered 88982 (1019)

Result Notes Nothing since last inspection.

153. Question Result, ID, References Sat, FS.TS.IMPOUND.R, 195.404(c) (195.264(b), NFPA 30)

Question Text *If a breakout tank first went into service after October 2, 2000 do records indicate operator has maintained adequate impoundment for each breakout tank?*

Assets Covered 88982 (1019)

Result Notes The operator inspects the containment regularly and demonstrated records. Two tanks went into service in 2018.

154. Question Result, ID, References Sat, FS.TS.IMPOUND.O, 195.264(b) (NFPA 30)

Question Text *If a breakout tank first went into service after October 2, 2000, does it have an adequate impoundment?*

Assets Covered 88982 (1019)

Result Notes Tanks 86 and 87 were constructed in 2018 and have no double bottom, but secondary containment is present.

155. Question Result, ID, References NA, FS.TS.REPAIRLEAKTEST.R, 195.310(a) (195.310(b), 195.307)

Question Text *For all breakout tanks that have been repaired, altered, or reconstructed, do the records indicate the work was performed in accordance with the applicable standard for the tank type?*

Assets Covered 88982 (1019)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No repairs requiring pressure testing during the inspection time period.

IM.HC: High Consequence Areas

156. Question Result, ID, References Sat, IM.HC.HCALOCATION.P, 195.452(f)(1) (195.452(a), 195.452(d)(2), 195.452(b)(2))

Question Text *Does the process require the identification of HCA-affecting pipe segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?*

Assets Covered 88982 (1019)

Result Notes Section 1.0 in the IMP addresses this.

157. Question Result, ID, References Sat, IM.HC.HCALOCATION.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a), 195.452(b)(2), 195.452(d)(2), 195.452(j)(1))

Question Text *Do records indicate that locations and boundaries of HCA-affecting pipe segments are correctly identified and maintained up-to-date?*

Assets Covered 88982 (1019)

Result Notes The operator showed the PIMMA app.

158. Question Result, ID, References Sat, IM.HC.HCALOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2)) (also presented in: IM.CA)

Question Text *Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?*

Assets Covered 88982 (1019)

Result Notes The HCAs have remained the same for the past several inspection cycles and consist of Ecological USAs in and around the Snake River which feeds into the Columbia River downstream.

159. Question Result, ID, References Sat, IM.HC.HCAIDENT.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include all locations where pipeline segments directly intersect a high consequence area?*

Assets Covered 88982 (1019)

Result Notes The operator has this in Attachment A-3 High Consequence Area Pipeline Intersections

160. Question Result, ID, References NA, IM.HC.HCAIDENT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that all locations where a pipeline segment is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate technical justification is provided?*

Assets Covered 88982 (1019)

Result Notes All areas are in a HCA.

161. Question Result, ID, References Sat, IM.HC.HCARELEASE.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include methods to determine the locations and volume of potential commodity releases?*

Assets Covered 88982 (1019)

Result Notes ICP C 35 contains volumes and the system overview also contains volume information.

162. Question Result, ID, References Sat, IM.HC.HCARELEASE.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that identified release locations and spill volumes are consistent with the documented process?*

Assets Covered 88982 (1019)

163. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*

Assets Covered 88982 (1019)

Result Notes IMP 5.2 This also in the Jacobs plan.

164. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that the analysis of overland spread is consistent with the documented process?*

Assets Covered 88982 (1019)

Result Notes The model appears to be reasonable. Jacobs conducted

165. Question Result, ID, References Sat, IM.HC.HCAH2OTRANSP.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include the analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*

Assets Covered 88982 (1019)

Result Notes IMP 5.2. The 2018 Jacobs Study also covers lateral spread.

166. Question Result, ID, References Sat, IM.HC.HCAH2OTRANSP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do records indicate that water transport analysis is consistent with the documented process?*

Assets Covered 88982 (1019)

Result Notes Witt/O'Briens. Water trajectory.

167. Question Result, ID, References NA, IM.HC.HCAAIRDISP.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include the analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?*

Assets Covered 88982 (1019)

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

168. Question Result, ID, References NA, IM.HC.HCAAIRDISP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do the records indicate that the analysis of air dispersion of vapors is consistent with the documented process?*

Assets Covered 88982 (1019)

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

169. Question Result, ID, References NA, IM.HC.HCAINDIRECT.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include all locations of pipeline segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?*

Assets Covered 88982 (1019)

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

170. Question Result, ID, References NA, IM.HC.HCAINDIRECT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do the records indicate that endpoints of pipeline segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?*

Assets Covered 88982 (1019)

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

171. Question Result, ID, References NA, IM.HC.HCACAT3.P, 195.452(f)(1) (195.452(b)(2), 195.452(a)(3))

Question Text *Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered 88982 (1019)

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

172. Question Result, ID, References NA, IM.HC.HCACAT3.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(b)(2), 195.452(a)(3))

Question Text *Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered 88982 (1019)

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

173. Question Result, ID, References NA, IM.HC.IMPCAT3.P, 195.452(b)(1) (195.12, 195.452(a)(3))

Question Text *Was a written IM program in place for Category 3 pipelines?*

Assets Covered 88982 (1019)

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

174. Question Result, ID, References NA, IM.HC.IMPCAT3.R, 195.452(l)(1)(ii) (195.12, 195.452(a)(3))

Question Text *Was a written IM program in place for Category 3 pipelines?*

Assets Covered 88982 (1019)

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

IM.INFOAN: Information Analysis

175. Question Result, ID, References Sat, IM.INFOAN.DATA.P, 195.452(f)(3) (195.452(g))

Question Text *Beginning July 1, 2020 does the information analysis process include the updated requirements of 195.452(g)*

Assets Covered 88982 (1019)

Result Notes Page 19 of the IMP Plan Section 5.2

176. Question Result, ID, References Sat, IM.INFOAN.SPATIAL.P, 195.452(f)(3) (195.452(g))

Question Text *Does the information analysis identify spatial relationships among anomalous information?*

Assets Covered 88982 (1019)

Result Notes The study performed by Jacobs includes the evaluation of disparate information. For ILI anomalous information, TDW evaluates those during the ILI analyses.

Lateral Liquid Spread Analysis Method

Tidewater Terminal Company provided locations of the three pipeline alignments, SRT Pasco Diesel Rail Pipeline, UMA-Hinkle Rail Diesel Pipeline, and SRT Inbound-Outbound Pipeline. The alignments were used to generate maps including local features to be used in the spill volume analysis. Provided alignments show where the pipeline crosses structures and features considered in the evaluation.

Additional features were identified through review of maps and are included on the lateral liquid spread maps for each pipeline.

A lateral liquid spread value was calculated for the lateral distance from the pipeline alignment using the site-specific soil types and percolation rates, release flow rates, response times, total volume, and considering local features such as topography or extensive impervious surfaces. Conservative assumptions were used to evaluate the percolation rates and calculate the lateral spread area, however are considered reasonable given the extent of area and uncertainties in naturally occurring materials such as soils.

Local features such as canals, ditches, and other areas where lateral spread could provide a potential pathway were identified and located from the Tidewater provided alignments. The lateral liquid spread distances were extended along the alignment in these areas, providing a conservative assumption for

release evaluation in the vicinity of these features.

177. Question Result, ID, References: Sat, IM.INFOAN.INFOANRECORD.R, 195.452(l)(1)(ii) (195.452(g))

Question Text: *Do records indicate that all data elements are used to perform information analysis to identify spatial relationships between anomalous information?*

Assets Covered: 88982 (1019)

Result Notes: TDW ILI runs are compared with prior runs.

IM.RA: Risk Analysis

178. Question Result, ID, References: Sat, IM.RA.RADATA.O, 195.452(b)(5) (195.452(f)(3))

Question Text: *Are field conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*

Assets Covered: 88982 (1019)

Result Notes: The field conditions match the risk analyses. The GIS maps are accurate and representative.

179. Question Result, ID, References: Sat, IM.RA.RADATA.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text: *Does the process include an analysis and integration of all available information about the integrity of the entire pipeline and the consequences of a failure?*

Assets Covered: 88982 (1019)

Result Notes Still in contained in Section 5.2 of the IMP Plan.

180. Question Result, ID, References Sat, IM.RA.RADATA.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text *Do the records indicate that all available information has been integrated into the risk analysis?*

Assets Covered 88982 (1019)

Result Notes This is still in the risk template.

181. Question Result, ID, References Sat, IM.RA.RAMETHOD.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text *Does the process include requirements for a risk analysis and the integration of all relevant risk factors, including the need to address potential risk of a compromised operations control system (e.g., cyber-attack), and all available information, when evaluating pipeline segments?*

Assets Covered 88982 (1019)

Result Notes This is in Table 5-1.

182. Question Result, ID, References Sat, IM.RA.RARESULTS.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text *Do the records indicate that the results of the risk analysis process are useful for drawing conclusions and insights for decision making?*

Assets Covered 88982 (1019)

Result Notes The risk analysis was suitable.

183. Question Result, ID, References Sat, IM.RA.RASEGMENT.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text *Does the risk analysis process consider and incorporate the variation in risk factors along the pipeline such that segment-specific risk results and insights are obtained?*

Assets Covered 88982 (1019)

Result Notes Tidewater IMP table 5-1

184. Question Result, ID, References Sat, IM.RA.RAMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(e))

Question Text *Do the records indicate the evaluation of the methodology(ies) used for evaluating risks to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?*

Assets Covered 88982 (1019)

Result Notes The Jacobs study (2018) for lateral spread analysis was presented and reviewed.

IM.CA: Continual Evaluation and Assessment

185. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 195.452(f)(5) (195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text *Does the process include requirements for performing periodic evaluations of pipeline integrity?*

Assets Covered 88982 (1019)

Result Notes Tidewater IMP section 7.0

186. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text *Do records indicate that evaluations of pipeline integrity are being performed periodically?*

Assets Covered 88982 (1019)

Result Notes The assessments are conducted every 5 years. A full assessment of all lines were conducted in April 2025.

187. Question Result, ID, References Sat, IM.CA.SEGMENTVERIFY.P, 195.452(f)(5) (195.452(j)(2))

Question Text *Does the segment verification process describe how risk factors used in segment identification are verified annually?*

Assets Covered 88982 (1019)

Result Notes Page 26.

188. Question Result, ID, References Sat, IM.CA.SEGMENTIDFACTORS.P, 195.452(f)(5) (195.452(j)(2))

Question Text *For the annual verification of risk factors, does the process include all risk factors that were used in determining pipeline segments that could-affect an HCA?*

Assets Covered 88982 (1019)

Result Notes This is on page 26.

189. Question Result, ID, References Sat, IM.CA.REANALYZEHCASEGMENTS.P, 195.452(f)(5) (195.452(j)(2))

Question Text *Does the verification process include re-analyzing segments to validate or re-establish endpoints of HCA segments when risk factors change?*

Assets Covered 88982 (1019)

Result Notes IMP Section 7.2

190. Question Result, ID, References Sat, IM.CA.SEGMENTVERIFY.R, 195.452(l)(1)(ii) (195.452(j)(2))

Question Text *Was annual verification of risk factors used in segment identification completed?*

Assets Covered 88982 (1019)

Result Notes 23 and 24 reviewed. Close Interval Surveys reviewed. CIS was performed Nov 2024 and in 2020 and 2021.

191. Question Result, ID, References Sat, IM.CA.ASSESSINTERVAL.P, 195.452(f)(5) (195.452(e), 195.452(g), 195.452(j)(3))

Question Text *Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval?*

Assets Covered 88982 (1019)

Result Notes Tidewater IMP section 5.3

192. Question Result, ID, References Sat, IM.CA.ASSESSINTERVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(3), 195.452(g))

Question Text *Do the records indicate that the assessment intervals are consistent with the risks identified for the pipe segment and the results of previous assessments?*

Assets Covered 88982 (1019)

Result Notes Dates and intervals were reviewed. The intervals were correct.

193. Question Result, ID, References Sat, IM.CA.ASSESSMETHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)

Question Text *Does the process specify assessment methods that are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered 88982 (1019)

Result Notes Tidewater IMP section 5.3.

194. Question Result, ID, References Sat, IM.CA.ASSESSMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)

Question Text *Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered 88982 (1019)

Result Notes Tidewater only uses ILI as their assessment method. This is appropriate for the specific integrity threats. MFL and Geometry.

195. Question Result, ID, References Sat, IM.CA.ASSESSNOTIFY.P, 195.452(f)(5) (195.452(j)(4), 195.452(m))

Question Text *Does the process include methodology for submitting variance notifications to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered 88982 (1019)

Result Notes This is in the IMP Manual Section 4.3

196. Question Result, ID, References NA, IM.CA.ASSESSNOTIFY.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(m), 195.452(j)(4))

Question Text *Do the records indicate that variance notifications been submitted to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered 88982 (1019)

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

IM.PM: Preventive and Mitigative Measures

197. Question Result, ID, References: Sat, IM.PM.PMMMEASURES.P, 195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section III, API Standard 1160)

Question Text: *Does the Integrity Management Program include a process for the identification and evaluation of preventive & mitigative measures (P&M measures), resulting from the risk analysis, to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area (HCA)?*

Assets Covered: 88982 (1019)

Result Notes: This is in Section 6 - 6.1 For example leak detection is 7%.

198. Question Result, ID, References: Sat, IM.PM.PMMMEASURES.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section VI, API Standard 1160)

Question Text: *Do records demonstrate that the process of identification and evaluation for Preventive & Mitigative Measures (P&M Measures) has been applied in accordance with the documented process?*

Assets Covered: 88982 (1019)

Result Notes: I reviewed close internal survey dates. Overfill protection records. 653 Inspections.

199. Question Result, ID, References: Sat, IM.PM.PMMIMPLEMENT.O, 195.452(b)(5) (195.452(i)(1), 195.452(i)(2), 195.452(i)(3), 195.452(i)(4))

Question Text: *Have preventive and mitigative actions been implemented as described in the records?*

Assets Covered: 88982 (1019)

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

200. Question Result, ID, References: Sat, IM.PM.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))

Question Text: *Do the records indicate that mitigative actions have been considered and implemented?*

Assets Covered: 88982 (1019)

Result Notes: There are no implementation issues.

201. Question Result, ID, References: Sat, IM.PM.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))

Question Text: *Do the records indicate that preventive actions have been considered and implemented?*

Assets Covered: 88982 (1019)

Result Notes: 6.0 PREVENTIVE AND MITIGATIVE MEASURES

6.1 GENERAL

Tidewater takes measures to prevent and mitigate the consequences of asset failure that could affect a high consequence area (HCA). The implementation of these measures includes conducting a risk analysis of the assets to identify additional actions to enhance public safety or environmental protection. Such actions include:

• Implementing damage control best practices (See Tidewater Terminal Company Pipeline Operations and Maintenance Manual)

• Monitoring of cathodic protection (See Tidewater Terminal Company Pipeline Operations and Maintenance Manual)

• Establishment of inspection intervals (See Tidewater Terminal Company Pipeline Operations and Maintenance Manual and Section 7.2 of this IMP)

• Installation of Emergency Flow Restricting Devices (EFRDs) (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• Installing systems that monitor pressure (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• Installing systems that detect leaks (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• Providing training to personnel (See Tidewater Terminal Company Operator Qualification Program and Tidewater Terminal Company Pipeline Operations and Maintenance Manual)

• Conducting emergency response drills with local emergency responders (See Tidewater Integrated Contingency Plan)

• Installing block valves or remotely controlled valves, to mitigate the size of a potential release (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• 24-hour monitoring by on-site personnel and SCADA system (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• API 653 routine inspections

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6.2 RISK ANALYSIS

In identifying the need for additional preventive and mitigative measures, Tidewater evaluates the likelihood of a potential release and how a release could affect the HCA. This evaluation includes relevant risk factors including:

• Elevation profile

• Characteristics of the product transported

• Amount of product that could be released

• Possibility of a spillage in a farm field following the drain tile into a waterway

• Ditches alongside roadways which the pipeline crosses

• Exposure of the pipeline to incorrect operation

• Geological hazards

• Seismic activity

• Relative location to waterways, under streets, and cultural sites

• Product capacity/spill potential

Risk Analysis results and recommendations for reducing or eliminating risk potential are ranked for priority and are submitted to the Tidewater Terminal General Manager for review and consideration.

Tidewater also evaluates the likelihood of a potential release from a facility, which could include tanks, pumps, piping, or manifolds. Both threat and consequence factors are evaluated for each asset type and for the facility as a whole.

202. Question Result, ID, References: Sat, IM.PM.PMMRISKANALYSIS.P, 195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section II, API Standard 1160)

Question Text: *Does the Integrity Management Program include conducting a risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection?*

Assets Covered: 88982 (1019)

Result Notes: 6.0 PREVENTIVE AND MITIGATIVE MEASURES

6.1 GENERAL

Tidewater takes measures to prevent and mitigate the consequences of asset failure that could affect a high consequence area (HCA). The implementation of these measures includes conducting a risk analysis

of the assets to identify additional actions to enhance public safety or environmental protection. Such actions include:

• Implementing damage control best practices (See Tidewater Terminal Company Pipeline Operations and Maintenance Manual)

• Monitoring of cathodic protection (See Tidewater Terminal Company Pipeline Operations and Maintenance Manual)

• Establishment of inspection intervals (See Tidewater Terminal Company Pipeline Operations and Maintenance Manual and Section 7.2 of this IMP)

• Installation of Emergency Flow Restricting Devices (EFRDs) (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• Installing systems that monitor pressure (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• Installing systems that detect leaks (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• Providing training to personnel (See Tidewater Terminal Company Operator Qualification Program and Tidewater Terminal Company Pipeline Operations and Maintenance Manual)

• Conducting emergency response drills with local emergency responders (See Tidewater Integrated Contingency Plan)

• Installing block valves or remotely controlled valves, to mitigate the size of a potential release (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• 24-hour monitoring by on-site personnel and SCADA system (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

• API 653 routine inspections

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6.2 RISK ANALYSIS

In identifying the need for additional preventive and mitigative measures, Tidewater evaluates the likelihood of a potential release and how a release could affect the HCA. This evaluation includes relevant risk factors including:

• Elevation profile

• Characteristics of the product transported

• Amount of product that could be released

• Possibility of a spillage in a farm field following the drain tile into a waterway

• Ditches alongside roadways which the pipeline crosses

• Exposure of the pipeline to incorrect operation

• Geological hazards

• Seismic activity

• Relative location to waterways, under streets, and cultural sites

• Product capacity/spill potential

Risk Analysis results and recommendations for reducing or eliminating risk potential are ranked for priority and are submitted to the Tidewater Terminal General Manager for review and consideration.

Tidewater also evaluates the likelihood of a potential release from a facility, which could include tanks, pumps, piping, or manifolds. Both threat and consequence factors are evaluated for each asset type and for the facility as a whole.

203. Question Result, ID, References: Sat, IM.PM.PMMRISKANALYSIS.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section VI, API Standard 1160)

Question Text: *Do records demonstrate that an adequate risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection was performed?*

Assets Covered: 88982 (1019)

Result Notes: 6.5 ADDITIONAL PREVENTIVE AND MITIGATIVE MEASURES

Additional preventive and mitigative measures will be evaluated within one year of each integrity assessment or when events occur which indicate a need for re-evaluation (e.g., unsatisfactory detection or mitigation of an actual leak).

Tank inspections and repairs are consistent with API requirements and data collected from these inspections is evaluated and integrated into the Facilities Risk Model annually. Shorter intervals are considered when necessary consistent with API 653 Inspection Intervals as tracked in the SRT Breakout Tanks Integrity Spreadsheet.

204. Question Result, ID, References: Sat, IM.PM.IMLEAKDETEVAL.P, 195.452(f)(6) (195.452(i)(3), 195 Appendix C, Section III, API Standard 1160)

Question Text: *Does the Integrity Management Program include a process for the evaluation of leak detection capabilities and modifying, as necessary, to protect the high consequence areas?*

Assets Covered: 88982 (1019)

Result Notes: Leak detection is in 6.3 in the IMP manual still and the leak detection 7.5% in 15 min.

205. Question Result, ID, References: Sat, IM.PM.IMLEAKDETEVAL.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(3), 195 Appendix C, Section VI, API Standard 1160)

Question Text: *Do records indicate that all required and other relevant leak detection evaluation factors have been evaluated to ensure the protection of HCAs?*

Assets Covered: 88982 (1019)

Result Notes: Meter to meter accounting is used continuously unless the line is shutdown. Records for PRVs were checked for 2024 for the piping in the tank farm

206. Question Result, ID, References: Sat, IM.PM.PMMEFRDREQUIRED.P, 195.452(f)(6) (195.452(i)(4), 195.452(i)(1), 195.452(i)(2), API Standard 1160)

Question Text: *Does the Integrity Management Program include a preventive & mitigative (P&M) measures process that specifically addresses the identification, evaluation, and application of EFRDs to protect high consequence areas in the event of a hazardous liquid pipeline release?*

Assets Covered: 88982 (1019)

Result Notes: This is still in IMP section 6.4

207. Question Result, ID, References: Sat, IM.PM.PMMEFRDREQUIRED.R, 195.452(f)(6) (195.452(i)(4), 195.452(i)(1), 195.452(i)(2), API Standard 1160)

Question Text: *Do the records demonstrate that all required relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?*

Assets Covered: 88982 (1019)

Result Notes: MOVs and Fisher Control Valves are used.

The Jacobs and Wittle studes assist in consideration.

6.4 EMERGENCY FLOW RESTRICTING DEVICES (EFRD)

The Pasco-Rail Diesel Pipeline and the Umatilla Hinkle Rail Diesel Pipelines have EFRDs installed that in an alarm condition will immediately shut down the transfer in progress. As part of its risk assessment Tidewater considers the following information to determine the need for and location of additional or modified EFRDs on its pipeline systems:

• Swiftness of leak detection and response

• Type of commodity carried

• Rate of potential leakage

• Volume that could be released

• Topography

• Location of nearest response personnel

• Specific terrain

• Geological hazards

• Seismic activity

• Relative location to waterways, under streets, and cultural sites

Information concerning the EFRDs on Tidewater's pipelines is contained in the respective Tidewater Terminal Company Systems Operations Manual for that specific pipeline.

208. Question Result, ID, References: Sat, IM.PM.PMMEFRDOTHER.P, 195.452(f)(6) (195.452(i)(4), 195.452(i)(1), 195.452(i)(2), API Standard 1160)

Question Text: *Does the process consider the inclusion of OTHER factors in the evaluation of EFRDs?*

Assets Covered: 88982 (1019)

Result Notes: 22

After the evaluation of the risk assessment results it was determined that a five year In-Line Assessment was the preferred and acceptable method of continuing assessment for the pipeline systems.

6.0 PREVENTIVE AND MITIGATIVE MEASURES

6.1 GENERAL

Tidewater takes measures to prevent and mitigate the consequences of asset failure that could affect a high consequence area (HCA). The implementation of these measures includes conducting a risk analysis of the assets to identify additional actions to enhance public safety or environmental protection. Such actions include:

• Installation of Emergency Flow Restricting Devices (EFRDs) (See Tidewater Terminal Company Systems Operation Manual for specific pipeline)

6.4 EMERGENCY FLOW RESTRICTING DEVICES (EFRD)

The Pasco-Rail Diesel Pipeline and the Umatilla Hinkle Rail Diesel Pipelines have EFRDs installed that in an alarm condition will immediately shut down the transfer in progress. As part of its risk assessment Tidewater considers the following information to determine the need for and location of additional or modified EFRDs on its pipeline systems:

• Swiftness of leak detection and response

• Type of commodity carried

• Rate of potential leakage

• Volume that could be released

• Topography

• Location of nearest response personnel

• Specific terrain

• Geological hazards

• Seismic activity

• Relative location to waterways, under streets, and cultural sites

Information concerning the EFRDs on Tidewater's pipelines is contained in the respective Tidewater Terminal Company Systems Operations Manual for that specific pipeline.

209. Question Result, ID, References: Sat, IM.PM.PMMEFRDOTHER.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(4), API Standard 1160, 195 Appendix C, Section VI, API Standard 1160)

Question Text: *Do the records demonstrate that OTHER relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?*

Assets Covered: 88982 (1019)

Result Notes: 6.4 EMERGENCY FLOW RESTRICTING DEVICES (EFRD)

The Pasco-Rail Diesel Pipeline and the Umatilla Hinkle Rail Diesel Pipelines have EFRDs installed that in an alarm condition will immediately shut down the transfer in progress. As part of its risk assessment Tidewater considers the following information to determine the need for and location of additional or modified EFRDs on its pipeline systems:

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• Swiftness of leak detection and response

• Type of commodity carried

• Rate of potential leakage

• Volume that could be released

• Topography

• Location of nearest response personnel

• Specific terrain

• Geological hazards

• Seismic activity

• Relative location to waterways, under streets, and cultural sites

Information concerning the EFRDs on Tidewater's pipelines is contained in the respective Tidewater Terminal Company Systems Operations Manual for that specific pipeline.

IM.FACIL: Facilities

210. Question Result, ID, References: Sat, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: TDC.IMFACIL)

Question Text: *Does the program include a written process for identification of facilities that could affect an HCA?*

Assets Covered: 88982 (1019)

Result Notes: This is the same since last inspection. Tidewater IMP section 1.0. Tidewater has designated their entire facility and surrounding an HCA

211. Question Result, ID, References: Sat, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(2)) (also presented in: TDC.IMFACIL)

Question Text: *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*

Assets Covered: 88982 (1019)

Result Notes: The records show the line has been positionally accurarate

212. Question Result, ID, References: Sat, IM.FACIL.RISKANAL.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text: *Does the process include approaches to identify and evaluate the risks of facilities that can affect HCAs?*

Assets Covered: 88982 (1019)

Result Notes: Section 5

213. Question Result, ID, References: Sat, IM.FACIL.RISKANAL.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text: *Do the records indicate that the analysis of risk of facilities has been performed as required?*

Assets Covered: 88982 (1019)

Result Notes: Information considered during the risk analysis includes, but is not limited to:

- Test and inspection results
- Results of periodic reviews and audits
- Evaluation of records
- Results of risk assessments/evaluations from other sources (i.e. Integrated Contingency Plan)

The risk assessment includes an analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effect on HCAs. This analysis was conducted in October 2013 by Witt/O'Brien's. It includes worst case discharge spill trajectory from both a pipeline release and a facility release at the Snake River Terminal. The analysis is included in Tidewater's Integrated Contingency Plan.

The risk assessment includes an analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs. This analysis was conducted in February of 2015 by Landau Associates and is included in Tidewater's Integrated Contingency Plan.

The risk assessment includes an analysis of the overland spread of hazardous liquids to determine the extent of commodity spread and its effect on HCAs. The Lateral Liquid Spread Analysis was conducted in May of 2018 by Jacobs Engineering Group.

These records help collect data to assist in risk analysis by storing data that can be used if needed.

Breakout Facilities

The following inspection and routine maintenance will be utilized to assess the containing integrity of the terminal breakout facilities. These inspections are reviewed by management after completion and are compiled within the Integrity Management Program Annual review. This will ensure corrective action items or repairs are being completed.

- API 653 Out-of-Service Inspection (Third-Party Report) (MCFO Work Order)
- API 653 In-Service Inspection (Third-Party Report) (MCFO Work Order)

- Terminal Tank Integrity Spreadsheet
- Monthly Breakout Tank Inspection (Terminal Form) (MCFO Work Order)
- Weekly Breakout Facilities Inspection (MCFO Work Order)
- Atmosphere Coating Inspection (Terminal Form) (MCFO Work Order)
- Monthly Tank Farm Rectifier Inspection (Terminal Form) (MCFO Work Order)
- Annual Cathodic Protection Survey (Third Party Corrosion Engineer) (Third-Party Report)
- Monthly Tank High-Level Inspection (Terminal Form) (MCFO Work Order)
- Annual Tank High-Level Alarm Inspection (Terminal Form) (MCFO Work Order)
- Monthly Containment Inspection (MCFO Work Order)
- Annual Thermal Relief Valve Testing and Inspection (Terminal Form) (MCFO Work Order)
- Quarterly Pump Inspection and Maintenance (MCFO Work Order)
- Annual Valve Maintenance (Terminal Form) (MCFO Work Order)
- Pressure Transducer Calibration Log (Terminal Form) (MCFO Work Order)
- Pressure Gauge Worksheet (Terminal Form) (MCFO Work Order)
- Monthly Fire Extinguisher Inspection (Terminal Form) (MCFO Work Order)

214. Question Result, ID, References: Sat, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)

Question Text: *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*

Assets Covered: 88982 (1019)

Result Notes: Still in Tidewater Contingency Plan section C.5.1.

215. Question Result, ID, References: Sat, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)

Question Text: *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*

Assets Covered: 88982 (1019)

Result Notes: The tanks are indicated as the worst case discharge for each pipeline segment C 35 in the ISCP.

216. Question Result, ID, References: Sat, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)

Question Text: *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*

Assets Covered: 88982 (1019)

Result Notes: Tidewater Integrated Contingency Plan section 5.2 IMP

217. Question Result, ID, References: Sat, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)

Question Text: *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*

Assets Covered: 88982 (1019)

Result Notes: Reviewed the overland spread & water transport documentation. The analysis was done by Jacobs consulting in May 2018. No issues. This is the same that Scott Anderson noted in his inspection. The map reviewed is SRT Pasco Diesel Rail Pasco. Figure 1 and 2.

218. Question Result, ID, References: NA, IM.FACIL.AIRDISP.P, 195.452(f)(1) (195.452(l)(1)(i))

Question Text: *Where the facility handles HVLs or Volatile Liquids, does the process include an analysis of the air dispersion of vapors released from the facility to determine effects on HCAs?*

Assets Covered: 88982 (1019)

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

219. Question Result, ID, References: NA, IM.FACIL.AIRDISP.R, 195.452(l)(1)(ii)

Question Text: *Where the facility handles HVLs or Volatile Liquids, do the records indicate that the analysis of air dispersion of vapors from the facility is consistent with the process requirements?*

Assets Covered: 88982 (1019)

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

220. Question Result, ID, References: Sat, IM.FACIL.PERIODEVAL.P, 195.452(f)(5) (195.452(g), 195.452(j)(1), 195.452(j)(2))

Question Text: *Does the process include requirements for performing continual evaluations of facility integrity?*

Assets Covered: 88982 (1019)

Result Notes: 6.5 ADDITIONAL PREVENTIVE AND MITIGATIVE MEASURES

Additional preventive and mitigative measures will be evaluated within one year of each integrity assessment or when events occur which indicate a need for re-evaluation (e.g., unsatisfactory detection or mitigation of an actual leak).

Tank inspections and repairs are consistent with API requirements and data collected from these inspections is evaluated and integrated into the Facilities Risk Model annually. Shorter intervals are considered when necessary consistent with API 653

Inspection Intervals as tracked in the SRT Breakout Tanks Integrity Spreadsheet.

221. Question Result, ID, References: Sat, IM.FACIL.PERIODEVAL.R, 195.452(l)(1)(ii) (195.452(j)(2))

Question Text: *Do the records indicate that periodic evaluations of integrity at facilities affecting HCAs have been performed?*

Assets Covered: 88982 (1019)

Result Notes: ILI runs and API 653 inspections are performed on schedule.

222. Question Result, ID, References: Sat, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text: *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*

Assets Covered: 88982 (1019)

Result Notes: IMP Section 6 (Seismic activity was added) Section 6.5 contains the 1 year evaluation portion.

223. Question Result, ID, References: Sat, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

Question Text: *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*

Assets Covered: 88982 (1019)

Result Notes: I reviewed EFRD and line pressure monitoring system.

224. Question Result, ID, References: Sat, IM.FACIL.PMMMITIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text: *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered: 88982 (1019)

Result Notes: Still in 6.2

225. Question Result, ID, References: Sat, IM.FACIL.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

Question Text: *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

Assets Covered: 88982 (1019)

Result Notes: EFRDs and pressure monitoring are the methods used for P&M measures.

226. Question Result, ID, References: NA, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: TDC.IMFACIL)

Question Text: *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*

Assets Covered: 88982 (1019)

Result Notes: No such activity/condition was observed during the inspection for specific measures such as EFRDs under flowing conditions, however overfill protection systems were verified.

IM.QA: Quality Assurance

227. Question Result, ID, References: Sat, IM.QA.IMPERFEFECTIVE.P, 195.452(f)(7) (195.452(k))

Question Text: *Does the process for evaluating IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*

Assets Covered: 88982 (1019)

Result Notes: No changes - Tidewater IMP section 8.0

228. Question Result, ID, References: Sat, IM.QA.IMPERFEFECTIVE.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

Question Text: *Do the records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*

Assets Covered: 88982 (1019)

Result Notes: Section 8.5 has the annual review and several checklists were reviewed.

229. Question Result, ID, References: Sat, IM.QA.RECORDS.P, 195.402(c)(3) (195.452(l)(1))

Question Text: *Does the process ensure that the records required for the integrity management program are maintained?*

Assets Covered: 88982 (1019)

Result Notes: Section 8.6 IMP

230. Question Result, ID, References: Sat, IM.QA.IMPERFMETRIC.P, 195.452(f)(7) (195.452(k))

Question Text: *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*

Assets Covered: 88982 (1019)

Result Notes: Section 8.1 of the IMP manual

231. Question Result, ID, References: Sat, IM.QA.IMPERFMETRIC.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

Question Text: *Do the records indicate that performance metrics are providing meaningful insight into integrity management program performance?*

Assets Covered: 88982 (1019)

Result Notes: IMP Section 8.1

232. Question Result, ID, References: Sat, IM.QA.RECORDS.R, 195.452(l)(1)(ii)

Question Text: *Do the records indicate that the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity?*

Assets Covered: 88982 (1019)

Result Notes: Annual Review of IM of Breakout Facilities was reviewed

MO.LO: Liquid Pipeline Operations

233. Question Result, ID, References: Sat, MO.LO.OMHISTORY.P, 195.402(a) (195.402(c)(1), 195.404(a), 195.404(a)(1), 195.404(a)(2), 195.404(a)(3), 195.404(a)(4), 195.404(c)(1), 195.404(c)(2), 195.404(c)(3))

Question Text: *Does the process address making construction records, maps, and operating history available as necessary for safe operation and maintenance?*

Assets Covered: 88982 (1019)

Result Notes: O&M 702

234. Question Result, ID, References: Sat, MO.LO.OMHISTORY.R, 195.404(a) (195.404(c), 195.9, 195.402(c)(1))

Question Text: *Do records indicate current maps and records of the pipeline system are maintained and made available as necessary?*

Assets Covered: 88982 (1019)

Result Notes: These are in hard copy and electronic

MO.LS: Low-Stress Rural Pipelines

235. Question Result, ID, References: NA, MO.LS.ECONBURDEN.P, 195.12(d) (195.12(b), 195.452(m))

Question Text: *Where applicable, does the process include reporting of 195.12(d) "economic compliance burden" in accordance with 195.452(m)?*

Assets Covered: 88982 (1019)

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

236. Question Result, ID, References: NA, MO.LS.ECONBURDEN.R, 195.12(f)(2) (195.12(b), 195.12(d), 195.452(m))

Question Text: *Where applicable, do the records indicate reporting of 195.12(d) "economic compliance burden" in accordance with 195.452(m)?*

Assets Covered: 88982 (1019)

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

RPT.NR: Notices and Reporting

237. Question Result, ID, References: Sat, RPT.NR.NOTIFYIMP.P, 195.452(f)(5) (195.452(j)(4), 195.452(h)(1), 195.452(m))

Question Text: *Does the process include a requirement for submitting an IMP notification for each of the following circumstances: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered: 88982 (1019)

Result Notes: Still in Tidewater IMP sections 4.2, 4.3, 7.2

238. Question Result, ID, References: NA, RPT.NR.NOTIFYIMP.R, 195.452(l)(1)(ii) (195.452(m), 195.452(j)(4), 195.452(h)(1), 195.452(c)(1))

Question Text: *Do the records indicate that the operator submitted IMP notification(s) for any of the following circumstances, when it was necessary to do so: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered: 88982 (1019)

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

RPT.RR: Regulatory Reporting (Traditional)

239. Question Result, ID, References: Sat, RPT.RR.ANNUALREPORTIMINSPECT.R, 195.49

Question Text: *Do the records indicate that the Annual Report Part F Data is complete and accurate?*

Assets Covered: 88982 (1019)

Result Notes: Section 8.8 in the IMP

240. Question Result, ID, References: Sat, RPT.RR.ANNUALREPORTIMASSESS.R, 195.49

Question Text *Is Annual Report Part G data complete and accurate?*
Assets Covered 88982 (1019)
Result Notes No changes reroutes, No

TD.ATM: Atmospheric Corrosion

241. Question Result, ID, References Sat, TD.ATM.ATMCORRODECOAT.P, 195.402(c)(3) (195.581(a), 195.581(b), 195.581(c))
Question Text *Does the process give adequate instruction for the protection of pipeline against atmospheric corrosion?*
Assets Covered 88982 (1019)
Result Notes O&M 403

242. Question Result, ID, References Sat+, TD.ATM.ATMCORRODECOAT.R, 195.589(c) (195.581(a), 195.581(b), 195.581(c))
Question Text *Do records document adequate protection of pipeline against atmospheric corrosion?*
Assets Covered 88982 (1019)
Result Notes These are done annually. I reviewed 2022 and 2024. The operator also performs 570.

243. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.P, 195.402(c)(3) (195.583(a), 195.583(b), 195.583(c))
Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments exposed to the atmosphere?*
Assets Covered 88982 (1019)
Result Notes The procedure is suitable.

244. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 195.589(c) (195.583(a), 195.583(b), 195.583(c))
Question Text *Do records document inspection of aboveground pipe exposed to atmospheric corrosion?*
Assets Covered 88982 (1019)
Result Notes These are done annually. I reviewed 2022 and 2024. The operator also performs 570.

245. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 195.583(c) (195.581(a))
Question Text *Is aboveground pipe that is exposed to atmospheric corrosion protected?*
Assets Covered 88982 (1019)
Result Notes Yes, aboveground sections of pipe and the breakout tanks were well coated for atmospheric protection.

TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection

246. Question Result, ID, References Sat, TD.CPBO.BO651.P, 195.402(c)(3) (195.563(d), 195.565)
Question Text *Does the process describe when cathodic protection must be installed on breakout tanks?*
Assets Covered 88982 (1019)
Result Notes O&M Section 400.1(f)

247. Question Result, ID, References Sat, TD.CPBO.BO.P, 195.402(c)(3) (195.573(d))
Question Text *Does the process adequately detail when and how cathodic protection systems will be inspected on breakout tanks?*
Assets Covered 88982 (1019)
Result Notes O&M 403.8 references 403

248. Question Result, ID, References Sat, TD.CPBO.BO.R, 195.589(c) (195.573(d))
Question Text *Do records adequately document when and how cathodic protection systems were inspected on breakout tanks?*
Assets Covered 88982 (1019)
Result Notes April 16, 2024 all tanks inspected for CP.

June 6 2023

April 7 2022 records reviewed

249. Question Result, ID, References: Sat, TD.CPBO.BO.O, 195.573(d)

Question Text: *Are cathodic protection monitoring tests performed correctly on breakout tank bottoms?*

Assets Covered: 88982 (1019)

Result Notes: The operator has changed from the 4 point (N,S,E,W) to an 8 point test pint check aligning with other operator's practices. They also use depole and native readings as a back up method.

250. Question Result, ID, References: Sat, TD.CPBO.DEFICIENCYBO.P, 195.402(c)(3) (195.573(e))

Question Text: *Does the process require correction of any identified deficiencies in corrosion control for breakout tanks?*

Assets Covered: 88982 (1019)

Result Notes: O&M 403.1d.

251. Question Result, ID, References: Sat, TD.CPBO.DEFICIENCYBO.R, 195.589(c) (195.573(e))

Question Text: *Do records document adequate operator actions taken to correct any identified deficiencies in breakout tank corrosion control?*

Assets Covered: 88982 (1019)

Result Notes: Records shown that the CP SME advised for tank 86 and 87.

252. Question Result, ID, References: Sat, TD.CPBO.MAPRECORDBO.P, 195.589(a) (195.589(b))

Question Text: *Does the process require maps and/or records of cathodic protection systems that have been installed on breakout tanks constructed, relocated, replaced, or otherwise changed?*

Assets Covered: 88982 (1019)

Result Notes: O&M 702b

253. Question Result, ID, References: Sat, TD.CPBO.MAPRECORDBO.R, 195.589(a) (195.589(b))

Question Text: *Do maps and or records document cathodic protection system appurtenances that have been installed on breakout tanks that have been constructed, relocated, replaced, or otherwise changed?*

Assets Covered: 88982 (1019)

Result Notes: Drawing from 2001 of CP anodes.

TD.CP: External Corrosion - Cathodic Protection

254. Question Result, ID, References: Sat, TD.CP.MAPRECORD.P, 195.589(a) (195.589(b)) (also presented in: TD.CPMONITOR)

Question Text: *Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?*

Assets Covered: 88982 (1019)

Result Notes: O&M 403

255. Question Result, ID, References: Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text: *Does the process require correction of any identified deficiencies in corrosion control?*

Assets Covered: 88982 (1019)

Result Notes: O&M 403

256. Question Result, ID, References: Sat, TD.CP.NEWOPERATE.P, 195.402(c)(3) (195.563(a), 195.563(c), 195.563(d))

Question Text: *Does the process specify when cathodic protection must be operational on constructed, relocated, replaced, or otherwise changed pipelines?*

Assets Covered: 88982 (1019)

Result Notes: Reference Prior CP question.

257. Question Result, ID, References: Sat, TD.CP.NEWOPERATE.R, 195.589(c) (195.563(a))

Question Text: *Do records document when cathodic protection was operational on constructed, relocated, replaced, converted to service, or otherwise changed pipelines?*

Assets Covered: 88982 (1019)

Result Notes: O&M 403

258. Question Result, ID, References: NA, TD.CP.UNPROTECT.P, 195.402(c)(3) (195.563(e), 195.573(b)(1), 195.573(b)(2))

Question Text: *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*

Assets Covered: 88982 (1019)

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

259. Question Result, ID, References: NA, TD.CP.UNPROTECT.R, 195.589(c) (195.573(b)(1), 195.573(b)(2))

Question Text: *Do records document the adequate re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?*

Assets Covered: 88982 (1019)

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

260. Question Result, ID, References: Sat, TD.CP.ISOLATE.P, 195.402(c)(3) (195.575(a), 195.575(b), 195.575(d))

Question Text: *Does the process provide adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered: 88982 (1019)

Result Notes: O&M 402.4 Insulating Devices

261. Question Result, ID, References: Sat, TD.CP.ISOLATE.R, 195.589(c) (195.575(a), 195.575(b), 195.575(d))

Question Text: *Do records document adequate electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered: 88982 (1019)

Result Notes: Isolation flanges the pipeline to station piping were reviewed.

262. Question Result, ID, References: Sat, TD.CP.ISOLATE.O, 195.575(a) (195.575(b), 195.575(d))

Question Text: *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered: 88982 (1019)

Result Notes: The tank farm is insulated from the pipeline system and several tanks observed in the field had dedicated rectifiers.

263. Question Result, ID, References: Sat, TD.CP.ISOLATETEST.P, 195.402(c)(3) (195.575(c))

Question Text: *Does the process provide adequate guidance to inspect and electrically test to ensure that electrical isolation is adequate?*

Assets Covered: 88982 (1019)

Result Notes: O&M 402.4

264. Question Result, ID, References: Sat, TD.CP.ISOLATETEST.R, 195.589(c) (195.575(c))

Question Text: *Do records adequately document the inspection and electrical testing performed to ensure that electrical isolation is adequate?*

Assets Covered: 88982 (1019)

Result Notes: Reviewed SME report for 2024

265. Question Result, ID, References: Sat, TD.CP.ISOLATETEST.O, 195.575(c)

Question Text *Do field observations verify that inspection and electrical testing ensures that electrical isolation is adequate?*

Assets Covered 88982 (1019)

Result Notes The rectifiers operated independently of each other for each individual tank and there did not appear to be any noticeable interference. The pipeline isolation was not checked during this IMP inspection and is performed during the standard inspection(s).

266. Question Result, ID, References Sat, TD.CP.FAULTCURRENT.P, 195.402(c)(3) (195.575(e))

Question Text *Does the process give sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?*

Assets Covered 88982 (1019)

Result Notes 402.5 Stray Current and 403.2 Recitifiers

267. Question Result, ID, References Sat, TD.CP.FAULTCURRENT.R, 195.589(c) (195.575(e))

Question Text *Do records document adequate installation and inspection of fault current and lightning protection?*

Assets Covered 88982 (1019)

Result Notes The rectifiers contain lightning arrestors.

268. Question Result, ID, References Sat, TD.CP.FAULTCURRENT.O, 195.575(e)

Question Text *Are fault current and lightning protection for the pipeline installed and inspected?*

Assets Covered 88982 (1019)

Result Notes The breakout tanks and rectifiers have lightning arrestors.

269. Question Result, ID, References Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 88982 (1019)

Result Notes They added protection (Chine seal)

270. Question Result, ID, References Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CPMONITOR)

Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*

Assets Covered 88982 (1019)

Result Notes Maps and records available

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

271. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADINSTALL.P, 195.402(c) (195.567(b))

Question Text *Does the process provide adequate instructions for the installation of test leads?*

Assets Covered 88982 (1019)

Result Notes O&M 402.3

272. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADINSTALL.R, 195.589(c) (195.567(b))

Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart H?*

Assets Covered 88982 (1019)

Result Notes These are in the design records.

273. Question Result, ID, References NA, TD.CPMONITOR.TESTLEADINSTALL.O, 195.567(a) (195.567(b))

Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart H?*

Assets Covered 88982 (1019)

Result Notes: No such activity/condition was observed during the inspection. The pipeline ROW and associated test stations were not visited as part of this IMP Program inspection. Several breakout tank facilities were inspected for alarms and CP. The line pipe is observed during UTC standard liquid inspections.

274. Question Result, ID, References: Sat, TD.CPMONITOR.TESTLEADMAINT.P, 195.402(c)(3) (195.567(c))
Question Text: *Does the process require that test lead wires must be properly maintained?*
Assets Covered: 88982 (1019)
Result Notes: O&M 403.6

275. Question Result, ID, References: Sat, TD.CPMONITOR.TESTLEADMAINT.R, 195.589(c) (195.567(c))
Question Text: *Do records document that CP test lead wires have been properly maintained?*
Assets Covered: 88982 (1019)
Result Notes: No issues

276. Question Result, ID, References: NA, TD.CPMONITOR.TESTLEADMAINT.O, 195.567(c)
Question Text: *Are CP test lead wires properly maintained?*
Assets Covered: 88982 (1019)
Result Notes: No such relevant facilities/equipment existed in the scope of inspection review. Tank CP readings were taken directly on the tank at the chine.

277. Question Result, ID, References: Sat, TD.CPMONITOR.MONITORCRITERIA.P, 195.402(c)(3) (195.571)
Question Text: *Does the process require that CP monitoring criteria be used that is acceptable?*
Assets Covered: 88982 (1019)
Result Notes: O&M 401.2 has the criteria

278. Question Result, ID, References: Sat, TD.CPMONITOR.MONITORCRITERIA.R, 195.589(c) (195.571)
Question Text: *Do records document that CP monitoring criteria used was acceptable?*
Assets Covered: 88982 (1019)
Result Notes: Instant offs are used to consider IR drop.

279. Question Result, ID, References: Sat, TD.CPMONITOR.MONITOR.O, 195.571
Question Text: *Do the methods for taking CP monitoring readings allow for the application of appropriate CP monitoring criteria?*
Assets Covered: 88982 (1019)
Result Notes: The operator uses native and depole readings in the event that -850 mV CSE cannot be achieved.

280. Question Result, ID, References: Sat, TD.CPMONITOR.TEST.P, 195.402(c)(3) (195.573(a)(1))
Question Text: *Does the process adequately describe how to monitor CP that has been applied to pipelines?*
Assets Covered: 88982 (1019)
Result Notes: O&M 403.4

281. Question Result, ID, References: Sat, TD.CPMONITOR.TEST.R, 195.589(c) (195.573(a)(1))
Question Text: *Do records adequately document required tests have been done on pipe that is cathodically protected?*
Assets Covered: 88982 (1019)
Result Notes: 3 years of records reviewed

282. Question Result, ID, References: Sat, TD.CPMONITOR.CIS.P, 195.402(c)(3) (195.573(a)(2))
Question Text: *Does the process adequately describe the circumstances in which a CIS or comparable technology is practicable and necessary no more than 2 years after a cathodic protection system has been installed?*
Assets Covered: 88982 (1019)
Result Notes: O&M 403.4 (b)

283. Question Result, ID, References: Sat, TD.CPMONITOR.CIS.R, 195.589(c) (195.573(a)(2))

Question Text: *Do records document, when circumstances dictated a need for close interval surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys?*

Assets Covered: 88982 (1019)

Result Notes: Dates are recorded on a tracking sheet by the operator and were reviewed.

284. Question Result, ID, References: Sat, TD.CPMONITOR.CURRENTTEST.P, 195.402(c)(3) (195.573(c))

Question Text: *Does the process give sufficient details for making electrical checks of rectifiers, interference bonds, diodes, and reverse current switches?*

Assets Covered: 88982 (1019)

Result Notes: 403.2

285. Question Result, ID, References: Sat, TD.CPMONITOR.CURRENTTEST.R, 195.589(c) (195.573(c))

Question Text: *Do records document adequate electrical checks of rectifiers, interference bonds, diodes, and reverse current switches and at the required intervals?*

Assets Covered: 88982 (1019)

Result Notes: These are done monthly. 2022 -2024 checked. The monthly checks contain the appropriate information.

286. Question Result, ID, References: Sat, TD.CPMONITOR.CURRENTTEST.O, 195.573(c)

Question Text: *Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*

Assets Covered: 88982 (1019)

Result Notes: The rectifiers checked were functioning properly and were in excellent condition.

287. Question Result, ID, References: Sat, TD.CPMONITOR.INTFRCURRENT.P, 195.402(c)(3) (195.577(a), 195.577(b))

Question Text: *Does the operator have a process in place to minimize detrimental effects of interference currents on its pipeline system and do the procedures for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*

Assets Covered: 88982 (1019)

Result Notes: O&M 402.5

288. Question Result, ID, References: NA, TD.CPMONITOR.INTFRCURRENT.R, 195.589(c) (195.577(a))

Question Text: *Do records document that the operator has an effective program in place to minimize the detrimental effects of interference currents on their pipeline system, and is minimizing detrimental effects of interference currents from their CP systems on other underground metallic structures?*

Assets Covered: 88982 (1019)

Result Notes: No such event occurred, or condition existed, in the scope of inspection review. No interference issues for CNGC and Marathon

289. Question Result, ID, References: NA, TD.CPMONITOR.INTFRCURRENT.O, 195.577(a)

Question Text: *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*

Assets Covered: 88982 (1019)

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

No issues with stray current (DC or AC) observed.

TD.COAT: External Corrosion - Coatings

290. Question Result, ID, References: Sat, TD.COAT.NEWPIPE.P, 195.402(c)(3) (195.557(a), 195.559, 195.401(c))

Question Text: *Does the process require coatings for pipelines constructed, relocated, replaced, or otherwise changed after the applicable date in 195.401(c) to meet the requirements of 195.559?*

Assets Covered: 88982 (1019)

Result Notes O&M 402.2

291. Question Result, ID, References Sat, TD.COAT.NEWPIPEINSPECT.P, 195.402(c)(3) (195.561(a), 195.561(b))

Question Text *Does the process require that the coating be inspected on new pipelines just prior to it being lowered into the pipe trench?*

Assets Covered 88982 (1019)

Result Notes O&M 402.2

292. Question Result, ID, References NA, TD.COAT.NEWPIPEINSPECT.R,

Question Text *Do records indicate that the operator electrically inspected all new coated pipe using a holiday detector?*

Assets Covered 88982 (1019)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No new buried pipe since the last inspection.

293. Question Result, ID, References NA, TD.COAT.NEWPIPE.R, 195.589(c) (195.557(a), 195.559, 195.401(c))

Question Text *Do records document that coatings for pipelines constructed, relocated, replaced, or otherwise changed meet the requirements of §195.559?*

Assets Covered 88982 (1019)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No new buried pipe since the last inspection.

294. Question Result, ID, References NA, TD.COAT.CONVERTPIPE.P, 195.402(c)(3) (195.557(b), 195.559)

Question Text *Does the process require that pipelines that have been converted to liquid service and were constructed after the applicable date in 195.401(c) have external coating?*

Assets Covered 88982 (1019)

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

There are no converted to service pipelines that previously carried another commodity.

295. Question Result, ID, References NA, TD.COAT.CONVERTPIPE.R, 195.589(c) (195.557(b), 195.559)

Question Text *Do records document that pipelines that have been converted to liquid service and were constructed after the applicable date in 195.401(c) have external coating?*

Assets Covered 88982 (1019)

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

296. Question Result, ID, References NA, TD.COAT.COATAPPLY.R, 195.589(c) (195.559(b), 195.401(c))

Question Text *Do records document that coatings are applied as required by procedures?*

Assets Covered 88982 (1019)

Result Notes Tank coating spec sheet was reviewed for T-22

297. Question Result, ID, References NA, TD.COAT.COATAPPLY.O, 195.561(a) (195.561(b), 195.559(b), 195.252(b))

Question Text *Is protective coating adequately applied?*

Assets Covered 88982 (1019)

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

TD.CPEXPOSED: External Corrosion - Exposed Pipe

298. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 195.402(c)(3) (195.569)

Question Text *Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination required to determine the extent of the corrosion?*

Assets Covered 88982 (1019)

Result Notes O&M 404

299. Question Result, ID, References: NA, TD.CPEXPOSED.EXPOSEINSPECT.R, 195.589(c) (195.569)

Question Text: *Do records document that exposed buried piping was adequately examined for corrosion and deteriorated coating?*

Assets Covered: 88982 (1019)

Result Notes: Nothing exposed during this inspection time period

300. Question Result, ID, References: NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 195.569

Question Text: *Verify that exposed buried piping is examined for corrosion and deteriorated coating.*

Assets Covered: 88982 (1019)

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

301. Question Result, ID, References: Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 195.402(c)(3) (195.587)

Question Text: *Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?*

Assets Covered: 88982 (1019)

Result Notes: O&M 528 and 529

302. Question Result, ID, References: NA, TD.CPEXPOSED.EXTCORRODEEVAL.R, 195.589(c) (195.587)

Question Text: *Do records adequately document the evaluation of externally corroded pipe?*

Assets Covered: 88982 (1019)

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

303. Question Result, ID, References: Sat, TD.CPEXPOSED.EXTCORRODEREPAIR.P, 195.402(c)(3) (195.585(a), 195.585(b))

Question Text: *Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered: 88982 (1019)

Result Notes: O&M Section 520

304. Question Result, ID, References: NA, TD.CPEXPOSED.EXTCORRODEREPAIR.R, 195.589(c) (195.585(a), 195.585(b))

Question Text: *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered: 88982 (1019)

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

TD.ICP: Internal Corrosion - Preventive Measures

305. Question Result, ID, References: NA, TD.ICP.REGRURALGATHER.P, 195.11(d) (195.11(b)(10))

Question Text: *Is there a process to continuously identify operating conditions that could contribute to internal corrosion for regulated gathering lines?*

Assets Covered: 88982 (1019)

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

306. Question Result, ID, References: NA, TD.ICP.REGRURALGATHER.R, 195.11(d) (195.11(b)(10))

Question Text: *Do records indicate the process to continuously identify operating conditions that could contribute to internal corrosion on regulated gathering lines adequately identifies threats, and was the program established before transportation began or if the pipeline existed on July 3, 2008, before July 3, 2009?*

Assets Covered: 88982 (1019)

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

307. Question Result, ID, References: Sat, TD.ICP.INVESTREMED.P, 195.402(c)(3) (195.579(a))

Question Text: *Does the process give adequate guidance for investigating and mitigating the corrosive effects of hazardous liquids or carbon dioxide being transported?*

Assets Covered 88982 (1019)

Result Notes O&M 406 Non corrosive products

308. Question Result, ID, References NA, TD.ICP.INVESTREMED.R, 195.589(c) (195.579(a))

Question Text *Do records document investigation and mitigation of the corrosive effects of hazardous liquids or carbon dioxide being transported?*

Assets Covered 88982 (1019)

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

309. Question Result, ID, References Sat, TD.ICP.INHIBITOR.P, 195.402(c)(3) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text *Does the process give adequate direction for the utilization of corrosion inhibitors?*

Assets Covered 88982 (1019)

Result Notes O&M 203.7

310. Question Result, ID, References NA, TD.ICP.INHIBITOR.R, 195.589(c) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text *Do records document that corrosion inhibitors have been used in sufficient quantity?*

Assets Covered 88982 (1019)

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

311. Question Result, ID, References NA, TD.ICP.INHIBITOR.O, 195.579(b)

Question Text *Are internal corrosion monitoring devices placed in appropriate locations?*

Assets Covered 88982 (1019)

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

312. Question Result, ID, References Sat, TD.ICP.EXAMINE.P, 195.402(c)(3) (195.579(a), 195.579(c))

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered 88982 (1019)

Result Notes O&M 403.11(g)

313. Question Result, ID, References NA, TD.ICP.EXAMINE.R, 195.589(c) (195.579(c), 195.579(a))

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered 88982 (1019)

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

314. Question Result, ID, References NA, TD.ICP.EXAMINE.O, 195.579(c) (195.579(a))

Question Text *Is removed pipe examined for evidence of internal corrosion?*

Assets Covered 88982 (1019)

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

315. Question Result, ID, References Sat, TD.ICP.EVALUATE.P, 195.402(c)(3) (195.587)

Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*

Assets Covered 88982 (1019)

Result Notes 403.11g ASME B31-G

316. Question Result, ID, References NA, TD.ICP.EVALUATE.R, 195.589(c) (195.587)

Question Text *Do records document adequate evaluation of internally corroded pipe?*

Assets Covered 88982 (1019)

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

317. Question Result, ID, References Sat, TD.ICP.REPAIR.P, 195.402(c)(3) (195.585(a), 195.585(b))

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*

Assets Covered 88982 (1019)

Result Notes O&M 500

318. Question Result, ID, References NA, TD.ICP.REPAIR.R, 195.589(c) (195.585(a), 195.585(b))

Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered 88982 (1019)

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

319. Question Result, ID, References NA, TD.ICP.BOLINING.P, 195.402(c)(3) (195.579(d))

Question Text *Does the process give adequate direction for installing breakout tank bottom linings?*

Assets Covered 88982 (1019)

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

320. Question Result, ID, References NA, TD.ICP.BOLINING.R, 195.589(c) (195.579(d))

Question Text *Do records document the adequate installation of breakout tank bottom linings?*

Assets Covered 88982 (1019)

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

TD.SP: Special Permits

321. Question Result, ID, References NA, TD.SP.PROCESS.P, 190.341(d)(2)

Question Text *Has a process been developed for complying with the special permit conditions?*

Assets Covered 88982 (1019)

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

322. Question Result, ID, References NA, TD.SP.PROCESS.R, 190.341(d)(2)

Question Text *Do records demonstrate the operator has complied with all special permit or waiver requirements?*

Assets Covered 88982 (1019)

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

323. Question Result, ID, References NA, TD.SP.PROCESS.O, 190.341(d)(2)

Question Text *Is the operator complying with special permit requirements?*

Assets Covered 88982 (1019)

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

TQ.QU: Qualification of Personnel - Specific Requirements

324. 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 88982 (1019)

Result Notes O&M 400.1b

325. Question Result, ID, References Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.555 (195.507(a), 195.507(b)) (also presented in: TD.CP)

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

Assets Covered 88982 (1019)

Result Notes Chris and Kelly take an annual test. It was reviewed for 4-23-24

TDC.IMFACIL: Integrity Management for Facilities (Re-Presented)

326. Question Result, ID, References: Sat, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: IM.FACIL)
Question Text: *Does the program include a written process for identification of facilities that could affect an HCA?*
Assets Covered: 88982 (1019)
Result Notes: This is the same since last inspection. Tidewater IMP section 1.0. Tidewater has designated their entire facility and surrounding an HCA

327. Question Result, ID, References: Sat, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(2)) (also presented in: IM.FACIL)
Question Text: *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*
Assets Covered: 88982 (1019)
Result Notes: The records show the line has been positionally accurarate

328. Question Result, ID, References: Sat, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)
Question Text: *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*
Assets Covered: 88982 (1019)
Result Notes: Still in Tidewater Contingency Plan section C.5.1.

329. Question Result, ID, References: Sat, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)
Question Text: *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*
Assets Covered: 88982 (1019)
Result Notes: The tanks are indicated as the worst case discharge for each pipeline segment C 35 in the ISCP.

330. Question Result, ID, References: Sat, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)
Question Text: *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*
Assets Covered: 88982 (1019)
Result Notes: Tidewater Integrated Contingency Plan section 5.2 IMP

331. Question Result, ID, References: Sat, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)
Question Text: *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*
Assets Covered: 88982 (1019)
Result Notes: Reviewed the overland spread & water transport documentation. The analysis was done by Jacobs consulting in May 2018. No issues. This is the same that Scott Anderson noted in his inspection. The map reviewed is SRT Pasco Diesel Rail Pasco. Figure 1 and 2.

332. Question Result, ID, References: Sat, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)
Question Text: *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*
Assets Covered: 88982 (1019)
Result Notes: IMP Section 6 (Seismic activity was added) Section 6.5 contains the 1 year evaluation portion.

333. Question Result, ID, References: Sat, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)
Question Text: *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*
Assets Covered: 88982 (1019)
Result Notes: I reviewed EFRD and line pressure monitoring system.

334. Question Result, ID, References: Sat, IM.FACIL.PMMMITIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered 88982 (1019)

Result Notes Still in 6.2

335. Question Result, ID, References Sat, IM.FACIL.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

Assets Covered 88982 (1019)

Result Notes EFRDs and pressure monitoring are the methods used for P&M measures.

336. Question Result, ID, References NA, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: IM.FACIL)

Question Text *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*

Assets Covered 88982 (1019)

Result Notes No such activity/condition was observed during the inspection for specific measures such as EFRDs under flowing conditions, however overfill protection systems were verified.

TDC.620REGS: New API 620 Tanks (Low Pressure) - Part 195 Requirements

337. Question Result, ID, References NA, TDC.650REGS.REPAIRSPEC.R, 195.205(b)(1) (API Std 650, API Std 653)

Question Text *Do records indicate breakout tanks were repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?*

Assets Covered 88982 (1019)

Result Notes No 620 tanks

IM.CA: Continual Evaluation and Assessment

338. Question Result, ID, References Sat, IM.HC.HCALOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2)) (also presented in: IM.HC)

Question Text *Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?*

Assets Covered 88982 (1019)

Result Notes The HCAs have remained the same for the past several inspection cycles and consist of Ecological USAs in and around the Snake River which feeds into the Columbia River downstream.

PD.SN: Facilities Signage and Security

339. Question Result, ID, References Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: FS.FG)

Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*

Assets Covered 88982 (1019)

Result Notes The facility is a MARSEC facility and it is secure.

340. Question Result, ID, References Sat, FS.FG.IGNITION.O, 195.438 (also presented in: FS.FG)

Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*

Assets Covered 88982 (1019)

Result Notes There is adequate signage that warn against ignition sources.

341. Question Result, ID, References Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: FS.FG)

Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*

Assets Covered 88982 (1019)

Result Notes There are suitable contact information signs around the facility. I called one of the numbers and it is current.

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

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: 88982 (1019)

Result Notes: Smoking is banned.

Hot work permit required.

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

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

Assets Covered: 88982 (1019)

Result Notes: O&M 212

344. 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: 88982 (1019)

Result Notes: O&M 211.2

TD.CP: External Corrosion - Cathodic Protection

345. 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: 88982 (1019)

Result Notes: O&M 400.1b

346. Question Result, ID, References: Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.555 (195.507(a), 195.507(b)) (also presented in: TQ.QU)

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

Assets Covered: 88982 (1019)

Result Notes: Chris and Kelly take an annual test. It was reviewed for 4-23-24

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

347. Question Result, ID, References: Sat, TD.CP.MAPRECORD.P, 195.589(a) (195.589(b)) (also presented in: TD.CP)

Question Text: *Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?*

Assets Covered: 88982 (1019)

Result Notes: O&M 403

348. Question Result, ID, References: Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text: *Does the process require correction of any identified deficiencies in corrosion control?*

Assets Covered: 88982 (1019)

Result Notes: O&M 403

349. Question Result, ID, References: Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text: *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered: 88982 (1019)

Result Notes: They added protection (Chine seal)

350. Question Result, ID, References: Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CP)

Question Text: *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*

Assets Covered: 88982 (1019)

Result Notes: Maps and records available

TD.CPEXPOSED: External Corrosion - Exposed Pipe

351. Question Result, ID, References: Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR)

Question Text: *Does the process require correction of any identified deficiencies in corrosion control?*

Assets Covered: 88982 (1019)

Result Notes: O&M 403

352. Question Result, ID, References: Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR)

Question Text: *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered: 88982 (1019)

Result Notes: They added protection (Chine seal)