Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Inspection Checklist, Cover Letter and Field Report, IMP and OQ Field Validation Forms** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/ Docket Number	ID 2657		
Inspector Name & Submit Date	Dave Cullom, June 7, 2013		
Chief Engineer Name & Review Date	Joe Subsits, June 12, 2013		
Operator Information			
Name of Operator:	Chevron Pipeline Company	**OPID #:**	2731
Name of Unit(s):	Ferndale Storage Terminal		
Records Location:	Ferndale		
Date(s) of Last Review:	July 13-14, 2010	**Inspection Date(s)**	May 7-9, 2013

Inspection Summary:

The Ferndale Storage Terminal is located in Ferndale, WA. It serves primarily as a butane storage facility although there is some non-jurisdictional propane that is also transported by truck and rail from the facility. There are two butane storage tanks that were designed to API 620 R specifications. They have a combined total capacity of 790000 barrels and were constructed in 1977 and 1994. There is approximately 75-100 feet of low stress jurisdictional pipeline in above and underground sections. Our inspection indicates five probable violations. We also noted one area of concern.

HQ Address:		**System/Unit Address:**	
Chevron Pipeline Company 4800 Fournace Place Bellaire, TX 77401-2324		Ferndale Storage Terminal 4100 Unick Rd Ferndale, WA 98248	
Co. Official:	Randy Curry	**Phone No.:**	(360) 384-1701
Phone No.:	713-432-2299	**Fax No.:**	(360) 384-7044
Fax No.:		**Emergency Phone No.:**	(360) 384-1701
Emergency Phone No.:			

Persons Interviewed	**Title**	**Phone No.**
Gary Saenz	Team Leader Health, Environment & Safety - DOT Pipeline Safety	(713) 432-3332
Vic Rients	Operations Supervisor	(360) 384-7031
Bob McCoy	Constuction Manager	(360) 384-1701
Andrew Gamble	Operator	(360)-384-7034

UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.

(check one below and enter appropriate date)

Team inspection was performed (Within the past five years.) or,	Date:	June 2010 Team Audit
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	

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PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

Comments:

	RECORDS REVIEW		S	U	NA	NC
	CONVERSION TO SERVICE					
1.	**195.5(a)(2)**	All aboveground segments of the pipeline, and appropriately selected underground segments must be visually inspected for physical defects and operating conditions which reasonably could be expected to impair the strength or tightness of the pipeline.			X	
2.	**195.5(c)**	Pipeline Records (Life of System)			X	
3.		Pipeline Investigations			X	
4.		Pipeline Testing			X	
5.		Pipeline Repairs			X	
6.		Pipeline Replacements			X	
7.		Pipeline Alterations			X	
	REGULATED RURAL GATHERING LINES		**S**	**U**	**NA**	**NC**
8.	**195.11(a)**	Operator has identified pipelines that are Regulated Rural Gathering Lines that meet all of the following criteria: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter from 6 5/8 inches to 8 5/8 inches; (2) located in or within one-quarter mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
9.	**195.11(b)**	Operator has prepared written procedures to carry out the requirements of **195.11.** (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). • Subpart B Reporting • Corrosion Control • Damage Prevention • Public Awareness • Establish MAOP • Line Markers • Operator Qualification			X	
10.	**195.11(c)**	If a new USA is identified after July 3, 2008, the operator must implement the requirements in paragraphs (b)(2 - 8), and (b)(11) for affected pipelines within 6 months of identification. For steel pipelines, comply with the deadlines in paragraphs (b)(9 & 10).			X	
11.	**195.11(d)**	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) of this section and the records required to comply with (b)(10) of this section, for the life of the pipe. (2) Records necessary to demonstrate compliance (b)(2 – 9 & 11) of this section according to the record retention requirements of the referenced section or subpart.			X	

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Comments:
1-11 No conversion to service

LOW-STRESS PIPELINES IN RURAL AREA			S	U	NA	NC
12.	**195.12(a)**	Operator has identified pipelines that are Regulated Low-stress Pipelines in Rural Areas that meet all of the following criteria: (except for those already covered by 49 CFR 195) (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter of 8 5/8 inches or more; (2) located in or within one-half mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
13.	**1959.12(b)**	Operator has prepared written procedures to carry out the requirements of **195.12.** (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). • Subpart B Reporting • Establish Integrity Management Plan • All Part 195 Safety Requirements			X	
14.	**195.12 (c)(1)**	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).			X	
15.	**195.12(d)**	If, after July 3, 2008, a new USA is identified, the operator must implement the requirements in paragraphs (b)(2)(i) for affected pipelines within 12 months of identification. (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			X	
16.	**195.12(d)**	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) for the life of the pipeline. (2) Records necessary to demonstrate compliance (b)(2 – 4)according to the record retention requirements of the referenced section or subpart.			X	

Comments:
12-16 No Regulated Low-stress Pipelines in Rural Areas

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REPORTING						
17.	**49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07**	**Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002** Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted?	X			
18.	**RCW 81.88.080**	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? *****Notes – The Commission has not requested a submission at this time from Chevron Ferndale Terminal. We may request at a later date*****	X			
19.	**195.48/.49**	Complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year for each commodity, and each state a pipeline traverses by June 15 of each calendar year. *****Notes - Mileage report also sent to the WUTC*****	X			
20.	**195.52**	Immediate notice to **NRC (800) 424-8802,** or electronically at **http://www.nrc.uscg.mil,** of certain events, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. (Amdt. 195-95, 75 FR 72878, November 26, 2010, eff. 1/1/2011). *****Notes – There are formulas in Chevron's manual for spill estimation, but nothing specific to HVLs. They have a plume model for worst case scenario conducted by Anvil.*****	X			
21.	**195.54(a)**	Accident Report - file as soon as practicable, but no later than 30 days after discovery. Submittal must be electronically to **http://pipelineonlinereporting.phmsa.dot.gov** (Amdt. 195-95, 75 FR 72878, November 26, 2010). *****Notes – No accidents or incidents since the last audit*****			X	
22.	**195.54 (b)**	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) *****Notes – No accidents or incidents since the last audit*****			X	
23.	**195.56(a)**	SRC Report is required to be filed within five **(5)** working days of the determination and within ten **(10)** working days after discovery 195.56(a) (195.55(a)) *****Notes – No accidents or incidents since the last audit*****			X	
24.	**195.56(b)**	SRC Report requirements, including corrective actions (taken and planned) *****Notes – No accidents or incidents since the last audit*****			X	
25.	**195.57**	Do records indicate reports were submitted within 60 days of completing inspection of underwater pipelines? 195.413(a) (195.57) *****Notes – No underwater or offshore pipelines*****			X	
26.	**195.59**	Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? *****Notes – No underwater or offshore pipelines*****			X	
27.	**195.64**	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at **http://opsweb.phmsa.dot.gov** (Amdt. 195-95, 75 FR 72878, Nov.26, 2010, eff. 1/1/2011).	X			
28.	**480-75-610**	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction *****Notes – No construction of pipelines > 100 feet in length******			X	
29.	**480-75-620**	Was MOP changed based on hydrotest? Report submitted? *****Notes – The MOP was not changed******			X	

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30.	**480-75-630(1)**	Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9144** (Within **2 hours of discovery**) for events which results in; a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection. *****Notes – No accidents or incidents since the last audit*****			X	
31.	**480-75-630(2)**	Written reports to the commission within 30 calendar days of the incident. The report must include the following: a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; (b) The extent of injuries and damage; (c) A description of the incident including date, time, and place; (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident; (e) The date and time the pipeline returns to safe operations; and (f) The date, time, and type of any temporary or permanent repair. *****Notes – No accidents or incidents since the last audit*****			X	
32.	**480-75-630(3)**	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline. *****Notes – No accidents or incidents since the last audit*****			X	
33.	**480-75-630(4)**	**Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)** (Via the commission's Virtual DIRT system or on-line damage reporting form) *****Notes – No damages have occurred*****				
34.	**480-75-630(4)(a)**	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) *****Notes – No accidents or incidents since the last audit*****			X	
35.	**480-75-630(4)(b)**	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed? *****Notes – No accidents or incidents since the last audit*****			X	
36.	**480-75-630(4)(c)**	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? **Note:** Records maintained for two years and made available to the commission upon request. *****Notes – No accidents or incidents since the last audit*****			X	
37.	**480-75-630(5)**	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
38.	**480-75-630(5)(a)**	• Notification requirements for excavators under RCW 19.122.050(1) *****Notes – No accidents or incidents since the last audit*****			X	
39.	**480-75-630(5)(b)**	• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and*****Notes – No accidents or incidents since the last audit*****			X	
40.	**480-75-630(5)(c)**	• Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. *****Notes – No accidents or incidents since the last audit*****			X	

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41.	**480-75-630(6)**	**Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities…** • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (630(6)(a) • A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 630(6)(b) *****Notes – No accidents or incidents since the last audit*****			X	

Comments:

CONSTRUCTION			S	U	NA	NC
42.	**195.204**	Construction Training/Qualification records including personnel who conduct visual inspections (e.g. inspectors of welds)	X			
43.	**195.214(b)**	Detailed Test Results to Qualify Welding Procedures and Qualifying tests *****Notes – The Procedure qualification records (PQR) and Welding Procedure Specification (WPS) records were not available at the time of inspection..*****		X		
44.	**195.222(a)**	Welders must be qualified in accordance with **Section 6 of API Standard 1104 (20th edition 2005, including errata/addendum 7/2007 and errata 2 12/2008)** or **Section IX of the ASME Boiler and Pressure Vessel Code** (**2007 edition, July 1, 2007**), except that a welder qualified under an earlier edition than currently listed in **195.3** may weld, but may not requalify under that earlier edition. (Amdt 195-94 Pub. 8/11/10 eff. 10/01/10).\ *****Notes - B 31.3 is the spec they used. The meter station and some outside piping were welded BPVC IX is adopted by B31.3*****	X			
45.	**195.222(b)**	Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has (1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 9 of API 1104. *****Notes – No records were provided or available demonstrating that a welder had used that process within 6 months of being qualified. Coly Rush, Kyla Jensen, and Matt Williams were qualified to ASME BPVC Section IX at the end of Jan 2013 per the OQ database, but the welding occurred in November 2012.**		X		
46.	**195.226(a)**	Arc burns must be repaired. *****Notes – This is in the manual. No arc burns noted in construction NDT report.*****			X	
47.	**195.226(b)**	If a notch is not repairable by grinding, a cylinder of the pipe containing the entire notch must be removed. Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? **(Ammonium Persulfate)**. *****Notes – No notches or gouges noted by NDT tech*****			X	
48.	**195.226(c)**	The ground wire may not be welded to the pipe/fitting being welded.	X			
49.	**195.228/.234**	Do procedures require welds to be nondestructively tested to ensure their acceptability according to **API 1104** and as per **195.228(b)** and per the requirements of **195.234** in regard to the number of welds to be tested? *****Notes – in MIP407 Section 5.10 *****	X			

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50.	**195.234(b)**	Nondestructive testing of welds performed: (1) In accordance with written procedures for **NDT** (2) By qualified personnel (3) By a process that will indicate any defects that may affect the integrity of the weld. *****Notes – 195.228 specifies the acceptability of a weld is determined according to the standards in Section 9 of API 1104. The NDT vendor's documentation states that the acceptance criteria will be determined under ASME B31.3 NFS. *****	X			
51.	**195.234(d) 195.266(a)**	Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?	X			
52.	**195.234(e) 195.266(a)**	Do records demonstrate all girth welds installed each day in selected locations specified in §195.234(e) are nondestructively tested over their entire circumference?	X			
53.	**195.234(f) 195.266(a)**	Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested? *****Notes - No old pipe is used*****			X	
54.	**195.234(g) 195.266(a)**	Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?	X			
55.	**195.266**	Construction Records maintained for life of pipeline				
56.	**195.266(b)**	Amount, Location, Cover of each Size of Pipe Installed	X			
57.	**195.266(c)**	Location of each Crossing with another Pipeline	X			
58.	**195.266(d)**	Location of each buried Utility Crossing	X			
59.	**195.266(e)**	Location of Overhead Crossings	X			
60.	**195.266(f)**	Location of each Valve and Test Station	X			
		PRESSURE TESTING	**S**	**U**	**NA**	**NC**
61.	**195.302(a)**	Pipelines, and each pipeline segment that has been relocated, replaced, or otherwise changed, must be pressure tested without leakage (see .302(b), .303, and .305(b) for exceptions). *****Notes - This probable violation is addressed in question # 65 (195.304)*****		X		
62.	**195.302(b)/ .302(c)**	Except for lines converted under **§195.5**, the following pipelines ***may*** be operated without having been pressure tested per Subpart E and without having established MOP under **195.406(a)(5)** [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure]. - .302(b)(2)(ii): Any carbon dioxide pipeline constructed before July 12, 1991, that is located in a rural area as part of a production field distribution system. - .302(b)(3): Any low-stress pipeline constructed before August 11, 1994, that does not transport HVL. - .302(b)(4)/.303: Those portions of older hazardous liquid and carbon dioxide pipelines for which an operator has elected the risk-based alternative under §195.303 and which are not required to be tested based on the risk-based criteria. *Note: (An operator that elected to follow a risk-based alternative must have developed plans that included the method of testing and a schedule for the testing by December 7, 1998. The compliance deadlines for completion of testing are as shown in the table in §195.303, and in no case was testing to be completed later than 12/07/2004).*				
63.		Have all pipelines other than those described above been pressure tested per Subpart E? *****Notes - This probable violation is addressed in question # 65 (195.304)*****		X		
64.		If pipelines other than those described above have not been pressure tested per Subpart E, has MOP been established under **195.406(a)(5),** in accordance with **.302(c)? ****Notes – This is a new pipeline section installed in 2012. The grandfather provisions do not apply.**			X	
65.	**195.304**	Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required. *****Notes – The test pressure was only maintained for 38 minutes for the spool being tested on 11/21/12 from 0900 to 0938*****		X		

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66.	**195.305(a)**	All pipe, all attached fittings, including components, must be pressure tested in accordance with **195.302**. **Note:** A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory. ******Notes - The issue is with the testing of the line pipe. The fittings were factory tested and that is acceptable******			X	
67.	**195.305(b)**	Manufacturer testing of components. Records available and adequate?	X			
68.	**195.306**	Appropriate test medium	X			
69.	**195.308**	Pipe associated with tie-ins pressure tested?	X			
70.	**195.310(a)**	Pipeline Test Records for useful life of facilities?	X			
71.	**195.310(b)**	Do test records required by paragraph (a) include:				
72.	**195.310(b)(1)**	Pressure recording charts ******Notes not required under 31.3 per facility operator, but this is required under part 195*****		X		
73.	**195.310(b)(2)**	Test instrument calibration records	X			
74.	**195.310(b)(3)**	Name of operator, person responsible, test company used, if any	X			
75.	**195.310(b)(4)**	Date and time of test	X			
76.	**195.310(b)(5)**	Minimum test pressure	X			
77.	**195.310(b)(6)**	Test medium	X			
78.	**195.310(b)(7)**	Description of the facility tested and the apparatus	X			
79.	**195.310(b)(8)**	Explanation of any pressure discontinuities, including test failures that appear on the pressure recording charts. *******Notes - No charts – please see PV on question # 72*****			X	
80.	**195.310(b)(9)**	Where elevation differences in the test section exceed **100 feet**, a profile of the elevation over the entire length of the test section must be included *******Notes - The test section is less than 100ft and flat terrain*****			X	
81.	**195.310(b)(10)**	Temperature of the test medium or pipe during the test period	X			

Comments:

INTERNAL DESIGN PRESSURE PROCEDURES		**S**	**U**	**NA**	**NC**
.402(c)/.422	Internal design pressure for pipe in a pipeline is determined in accordance with the requirements of this section and the formula: P = (2 St/D) x E x F. **.106 ***Notes – In MIP104*****	X			

OPERATION & MAINTENANCE			**S**	**U**	**NA**	**NC**
82.	**195.402(a)**	Annual Review of O&M Manual (**1 per yr/15 months**) ******Notes – The Main manual used for all audits was last updated 12/12******	X			

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83.		Appropriate parts must be kept at locations where O&M activities are conducted *****Notes – The O&M is electronic and accessible to all Chevron employees*****	X			
84.	**195.402(c)(4)**	Determination of Areas requiring immediate response for Failures or Malfunctions *****Notes – The entire pipeline is within eye-distance of the control room. The Emergency manual has some info and the plume analysis has identified sites.*****	X			
85.	**195.402(c)(5)**	Pipeline accidents analyzed to determine their causes ******Notes – No accidents or failures during this inspection period******			X	
86.	**195.402(c)(10)**	Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards. Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per **195.59****Notes – None******			X	
87.	**195.402(c)(12)**	Establishment/Maintaining liaison with Fire, Police, and other Public Officials *****Notes - They send packets and a public awareness*****	X			
88.	**195.402(c)(13)**	Periodic review of personnel work – effectiveness of normal O&M procedures and corrective action when deficiencies are found *****Notes – They do observations on individuals two different ways. They use qac quality assessment checklists is one way of performing this. They use performance evaluations as well three times a year.*** ***Notes – They have not had a recent AOC******	X			
89.	**195.402(c)(15)**	Implementing the applicable control room management procedures required by **195.446.** (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). ******Notes – No control room at this facility per operator******			X	
90.	**195.402(e)(1)**	Records that indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures.	X			
91.	**195.402(e)(2)**	Prompt and effective response to each type of emergency **Note:** Review operator records of previous accidents and failures including third-party damage and leak response ******Notes – No accidents or failures during this inspection period******			X	
92.	**195.402(e)(7)**	Records indicating that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLs)? *****Notes – The DOT book has extra HVL procs*****	X			
93.	**195.402(e)(9)**	Post accident review of employees' activities to determine if procedures were effective and corrective action was taken? *****Notes – No accidents to review*****			X	
94.	**195.402(e)(10)**	Actions to be taken by a controller during an emergency in accordance with **195.446.** (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). *****Notes – No controllers for this system******			X	
95.	**195.403(a)**	Records of operator provided training to its emergency response personnel as required *****Notes this was done in 2011 ******	X			
96.	**195.403(b)(1)**	Annual review with personnel on performance in meeting the objectives of the emergency response training program (**1 per yr/15 months**)	X			
97.	**195.403(b)(2)**	Make appropriate changes to the emergency response training program (**1 per yr/15 months**) *****Notes - 4/19/2012 propane truck drill – no lessons learned noted*****	X			

Comments:

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	OPERATION & MAINTENANCE (Cont)		S	U	NA	NC
98.	**195.403(c)**	Verification of supervisor knowledge of emergency response procedures (**1 per yr/15 months**) ****Notes - Supervisor is trained to level 5 hazwoper****	X			
99.	**195.404(a)(1)**	Maps and Records of the following facilities maintained and made available: i. Breakout tanks ii. Pump stations iii. Scraper and sphere facilities iv. Pipeline valves v. Facilities to which 195.402(c)(9) applies vi. Rights-of-way vii. Safety devices to which 195.428 applies	X			
100.	**195.404(a)(2)**	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines.	X			
101.	**195.404(a)(3)**	The maximum operating pressure of each pipeline in accordance with 195.406	X			
102.	**195.404(a)(4)**	The diameter, grade, type, and nominal wall thickness of all pipe ***Notes – I was provided spec sheet from operator***	X			
103.	**195.404(b)(2) 195.402(d)(1)**	Response to any emergency or abnormal operations applicable under 195.402 (maintained for at least 3yrs) as required by written procedures *******Notes – No accidents or failures during this inspection period***			X	
104.	**195.404(b) 195.402(d)(5)**	Periodic review of personnel work – effectiveness of abnormal operation procedures/corrective action taken when deficiencies found.	X			
105.	**195.404(c)(1)**	The date, location, and description of each repair made on the pipe and maintain it for the **life of the pipe**. ***Notes - The PNID shows the new MOV***	X			
106.	**195.404(c)(2)**	The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least **1 year**.	X			
107.	**195.404(c)(3)**	Each inspection and test required by **Subpart F** shall be maintained for at least **2 years, or until the next inspection or test is performed, whichever is longer**.	X			
108.	**195.406(a)/ .406(a)(1)**	Except for surge pressures and other variations from normal operations, the operator shall not operate a pipeline above the MOP, and the MOP may not exceed any of the following; • The internal design pressure of the pipe determined by **195.106**. ***Notes - The pumps cannot exceed the MOP ***	X			
109.	**480-75-620**	Change in MOP? Changed based on hydrotest? **Notes - None***			X	
110.	**195.408(b)**	Records indicating emergency communication system(s) use was as required **Notes- No emergencies**			X	
111.	**195.412(a)**	Operator must inspect the right-of-way at intervals not exceeding **3 weeks**, but at least **26 times each calendar year** ***Notes - They drive past the ROW every day of the week***	X			
112.	**195.412(b)**	Records indicating ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed ***Notes – no navigable waterways***			X	
113.	**480-75-640**	Depth of cover surveys and mitigation ****Notes – None needed entire pipeline underground is cased. ****	X			
114.	**195.420(b)**	Mainline valves inspected to determine that it is functioning properly at intervals not exceeding **7½ months**, but at least **twice** each calendar year. ***Notes – Looked at 2011 and 2012 records for the 6 inch***	X			
115.	**480-75-500**	Pipe movement study per API 1117 ****Notes – no pipelines were moved or relocated***			X	
116.	**195.428(a)**	Insp. of overpressure safety devices (**1 per yr/15 months** non-HVL; **2 per yr/7½ months** HVL) ***Notes - Looked at records for the thermal PSVs to T-1 and T-2. There were 17 devices and the records provided did not indicate that they were all tested at the required intervals back to 2010. None were conducted in 2012 or 2013. ***		X		
117.	**195.428(b)**	Inspection of Relief Devices on HVL Tanks (intervals NTE **5 yrs**). T-1 709 ABCDE 710 AB were done by Bay Valve too in 2009 and records provided via email T-2 1024 A B C D E F G H (all different devices 1 per letter) 2009 was looked at 4 sheets cover vacuum and overpressure sides 1.5psig .5 oz VAC.	X			

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118.	**195.428(c)**	Above ground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to section 5.1.2 of API Standard 2510. Amt. 195-86 Pub. 06/09/06 eff. 07/10/06. Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 unless operator noted in procedures manual (195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank. ******Notes - No jurisdictional 2510 tanks*****			X	
119.	**195.428(d)**	Inspection of Overfill Systems (**1 per yr/15 months** non-HVL; **2 per yr/7½ months** HVL) T-1 2011 needed - Checked OK	X			
120.	**480-75-300 (3)**	Leak detection and alarm records ******Notes - The operator has pressure sensing equipment and monitors the system******	X			
121.	**480-75-320**	Surge analysis done? ***** Notes -Pump curves show pumps incapable of exceeding MOP, surge analysis not required******			X	
122.	**195.430**	Inspection of Fire Fighting Equipment	X			
123.	**195.432(c)**	**Breakout Tanks:** Inspect the physical integrity of in-service steel aboveground breakout tanks built to **API Standard 2510** according to **Section 6 of API 510.** Amt. 195-86 Pub. 06/09/06 eff 07/10/06. **Note: For Break-out tank unit inspection, refer to Breakout Tank Form ****Notes - No jurisdictional 2510 tanks*****			X	

	PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162)		**S**	**U**	**NA**	**NC**
124.	**195.440 (e & f)**	**PUBLIC AWARENESS PROGRAM** Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements – Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc), See table below. Operators in existence on June 20, 2005, must have completed their written program no later than June 20, 2006 **API RP 1162 Baseline* Recommended Message Delivery Frequencies**		X			
		Stakeholder Audience (Hazardous Liquid Operators	**Baseline Message Frequency (Starting from Effective Date of Plan)**			
		Residence along right-of-way and Places of Congregation	2 Years			
		Emergency Officials	Annual OK			
		Public Officials	3 Years			
		Excavator and Contractors	Annual			
		One-Call Centers	As required of one-call center			
		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, record keeping, program evaluation, etc.				
125.	**.440(g)**	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.		X			
126.	**.440(i)**	Records indicating that the continuing public education program evaluation process has been implemented and do records indicate that continuous improvement is being implemented		X			

Comments:
******Notes – CPL has sent out CD to all First Responders in their operating areas with the DOT Emergency Response Guidebook. They also send out annual emergency response emails.******

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		DAMAGE PREVENTION PROGRAM	S	U	NA	NC
127.	195.442(a)	Records indicating the damage prevention program is being carried out as written	X			
128.	195.442(c)(1)	List of Current Excavators ***** Notes – Paradigm provides lists of excavators and the operator provided *****	X			
129.	195.442(c)(2)	Notification of Public/Excavators	X			
130.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records) *****Notes – They have a GIS*****	X			
131.	195.442(c)(4)	If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings. *****None -- No excavation occurs in the pipeline area due to its short length and isolated location.*****			X	
132.	195.442(c)(5)	Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins. *****None -- No excavation occurs in the pipeline area due to its short length and isolated location.*****			X	
133.	195.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
134.		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline?	X			
135.		2. In the case of blasting, does the inspection include leakage surveys? (required) *****Notes – No blasting in the area******			X	
136.		Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? ******Notes - No failures******			X	
137.		**OPERATOR QUALIFICATION**				
138.	195.507(a) .507(b)	Are personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
139.	195.507(a) .507(b)	Are qualification records available for contractor personnel that contain the required elements?	X			

Comments:
CP – Norton Corrosion Contractor's are all NACE certified testers and one is a NACE Level 4. They perform the Annual PSP reads, check for interference currents, and conduct rectifier checks.

		CPM SYSTEMS	S	U	NA	NC
140.	195.444	Each CPM system employed on a pipeline segment should be fully described and the documentation readily available for reference by the users and by those employees responsible for the maintenance and support of the CPM system				
141.		**a.** General Information (this information is usually available as a part of normal Control Center information). **b.** A system map, profile and detailed physical description for each pipeline segment. **c**. A summary of the characteristics of each product transported.			X	
142.		**CPM Specific Information:**				

143.	**195.444**	a. A tabulation of the inputs used in the CPM procedure for each pipeline segment. b. A general description of the CPM outlining its principles of operation. c. A list of special considerations or step-by-step procedures to be used in evaluating CPM results and for requesting assistance with alarm evaluation, e.g., on-call support phone numbers where this systems is implemented.			X	
144.		d. Details of the expected performance of the leak detection system under normal and line upset conditions; and the effects of system degradation on the leak detection results. e. CPM pipeline controller training manuals or information. f. CPM alarm thresholds for the various applications.			X	

Comments: ***Notes – 140-144 No CPM system in use***

		CORROSION CONTROL	S	U	NA	NC
145.	**195.589(c) 195.555**	Supervisors maintain thorough knowledge of corrosion procedures.	X			
146.	**195.589(c) 195.567(c)**	Test lead maintenance / Frequent enough intervals ******Notes – No test leads to maintain Only small portion of pipe is underground, test leads are impractical *****			X	
147.	**480-75-510**	Corrosion remediation within 90 days *****Notes – No corrosion issues*****			X	
148.	**195.589(c) 195.569**	Inspection of Exposed Buried Pipelines (External Corrosion) ******Notes – No exposures – cased and above ground*****			X	
149.	**195.589(c) 195.573(a)(1)**	External Corrosion Control, Protected Pipelines Annual CP tests (**1 per yr/15 months**) *****Notes – Done by Norton Corrosion*****	X			
150.	**195.589(c) 195.573(a)(2)**	Close Interval Surveys - when circumstances dictated a need for surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys? *****Notes - Close interval surveys impractical with limited amount of underground pipe*****			X	
151.	**195.589(c) 195.573(b)(1) & (2)**	External Corrosion Control, Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/NTE 39 months**) *****Notes – None*****			X	
152.	**195.589(c) 195.573(c)**	Interference Bonds, reverse current switches, diodes, rectifiers.	X			
153.	**195.589(c) 195.573(e)**	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?	X			
154.	**195.589(c) 195.575(a-d)**	Electrical isolation inspection, testing and monitoring (if applicable)	X			
155.	**195.589(c) 195.577(a)**	Testing for Interference Currents	X			
156.	**195.589(c) 195.579(a)**	Corrosive effects investigation ******Notes - No investigation needed******			X	
157.	**195.589(c) 195.579(b)**	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (**2 per yr/NTE7½ months**) *****Notes - None needed *****			X	
158.	**195.589(c) 195.579(b)(1-3)**	Corrosion inhibitors used in sufficient quantities*****Notes - None needed *****			X	
159.	**195.589(c) 195.579(a)(c)**	Inspection of Removed Pipe for Internal Corrosion *****Notes - No removed pipe *****			X	
160.	**195.589(c) 195.583(a-c)**	Atmos. Corr. Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) it was August 2010 and October 2011 by Hitech Also October 2012	X			

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161.	**195.589(c) 195.585(a)**	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG *****Notes - No pitting found on pipe*****			X	
162.	**195.585(b)**	Localized Corrosion Pitting – replace, repair, reduce MOP *****Notes - No pitting found on pipe*****			X	
163.	**195.589(a)&(b) 195.563(a)**	Cathodic Protection Do records document when cathodic protection was operational on constructed, relocated, replaced, or otherwise changed pipelines within the last 5 years? (Maps showing anode location, test stations, CP systems, protected pipelines, etc.) ******Notes - The report by the Corrosion contractor has locations of CP equipment******	X			

Comments:

AG - Rectifier check OQ records 3/22/2014

FIELD REVIEW			S	U	N/A	N/C
164.	**195.262(a)**	Has adequate ventilation been provided at pump station buildings?	X			
165.	**195.262(a)**	Have warning devices that warn of the presence of hazardous vapors been installed at new pump station buildings?	X			
166.	**195.262(b)**	Has a device for activating emergency shutdown of the pump station been installed?	X			
167.	**195.262(b)**	If power is needed to actuate safety devices, has an auxiliary power supply been provided?	X			
168.	**195.262(b)**	Have safety devices been installed to prevent over-pressuring new or modified pumping equipment?	X			
169.	**195.262(d)**	Has on-shore pumping equipment been installed on property under the control of the operator and is that equipment at least 50 feet from the boundary of that property?	X			
170.	**195.262(e)**	Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps?	X			
171.	**195.302**	Is pressure testing being adequately conducted? (.304, .305, .306, .307) *****Notes – This was addressed in a previous PV earlier in this document*****		X		
172.	**195.308**	Pre-pressure Testing Pipe - Marking and Inventory *****Notes –No pretested pipe stored at this time*****			X	
173.	**195.402(c)(13)**	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site.	X			
174.	**195.403(c)**	Supervisor Knowledge of Emergency Response Procedures	X			
175.	**195.410**	Are line markers placed and maintained as required? 195.410(a) (195.410(b); 195.410(c); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	X			
176.	**480-75-540**	Markers at exposed areas	X			
177.	**195.412**	Are the ROW conditions acceptable for the type of patrolling used?	X			
178.	**195.420 (a), (b)**	Valve Maintenance & Operation	X			
179.	**195.420(c)**	Valve Protection from Unauthorized Operation and Vandalism	X			
180.	**195.426**	Are launchers and receivers equipped with relief devices? *****Notes - Facility piping is not required to have ILI capabilities*****			X	
181.	**195.428(a)**	Are inspections of overpressure safety devices adequate (including HVL lines)? *****Notes – This was addressed in a previous PV earlier in this document*****		X		
182.	**195.428(a)**	Do pressure control devices installed on HVL pressure breakout tanks appear to be in satisfactory mechanical condition and to be functioning properly?	X			

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FIELD REVIEW			S	U	N/A	N/C
183.	**195.428(c)**	Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.] *****Notes – The tanks were not constructed after Oct 2, 2000*****			X	
184.	**480-75-320**	Relief Device set at or below MOP *****Notes - Pump curve max is below MOP and thermal reliefs below MOP*****	X			

Comments:

FIELD REVIEW (Cont)			S	U	N/A	N/C
185.	**480-75-300**	Leak Detection – 8% in 15 Minutes *****Notes - Most of the system is aboveground and can be seen visually, automated leak detection not required*****			X	
186.	**480-75-300**	Leak detection at flow and no flow conditions *****Notes - Most of the system is aboveground and can be seen visually, automated leak detection not required*****			X	
187.	**195.430**	Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly? (195.430(a) (195.430(b); 195.430(c); 195.262(e))	X			
188.	**195.432**	Breakout Tanks	X			
189.	**480-75-330**	Do Breakout Tanks have independent overfill alarms?	X			
190.	**195.434**	Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?	X			
191.	**195.436**	Security - Pumping Stations - Breakout Tanks	X			
192.	**195.438**	Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?	X			
193.	**195.446(a)**	Is the SCADA display representative of the system configuration? 195.404(a) (195.505(f); 195.446(h))	X			
194.	**195.446(b)**	Do operating personnel know the MOP of respective pump stations and associated alarm settings?	X			
195.	**195.446(h)**	Do controllers demonstrate adequate skills and knowledge? 195.505(b) (195.446(g)(2))	X			
196.	**195.501-195.509**	**Important:** Per OPS, the OQ Field Inspection Protocol Form 15 shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database located at http://primis.phmsa.dot.gov/oqdb/home **Form Completed/Uploaded? Y/N** Need to do after Chief Engineer review				
197.	**195.571**	Cathodic Protection (test station readings, other locations to ensure adequate CP levels)	X			
198.	**195.573**	Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?	X			
199.	**195.575**	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? 195.575(a) (195.575(b); 195.575(c); 195.575(d))	X			
200.	**195.583**	Atmospheric corrosion - Exposed pipeline components, (splash zones, water spans, soil/air interface, under thermal insulation, disbanded coatings, pipe supports, deck penetrations, etc.) 195.583(c) (195.581(a))	X			

Comments:

Recent PHMSA Advisory Bulletins (Last 2 years)

Number	**Date**	**Subject**
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.

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