OPERATOR INSPECTION-SPECIFIC INFORMATION

Inspection Date(s):	**4-1-13** through **4-4-13**
Name of Operator:	**Targa Sound Terminal LLC**
OPS Operator ID:	**38921**
State/Other ID:	

H.Q. Address: **Targa Resources** **1000 Louisiana, Ste 4300** **Houston, TX 77002** **OPID 32296**		**Company Officer:**	Vincent DiCosimo
		Title:	VP Petroleum Logistics
		Phone Number:	(713) 584-1235
		Fax Number:	NA
Web Site:		**Email Address:**	**vdicosimo@targaresources.com**
Employees Covered by OQ Plan:		5	
Contractors Covered by OQ Plan:		2 - from Alaska continental Pipeline	
Total Mileage Represented:		2.7 miles	

Persons Interviewed	Title	Phone Number	Email Address
Tim Huffer From LA	Manager regulatory Compliance	337-583-4642	thuffer@targaresources.com
Ted Lilyeblade, JR	Pipeline Supervisor	253 272 9348	tlilyeblade@targaresources.com
Matthew Kolata	Environmental and Safety Specialist	353 272 9348	mkolata@targaresources.com

To add rows, press TAB with cursor in last cell.

OPS/State Representatives	Region/State
Patti Johnson	**WA**

To add rows, press TAB with cursor in last cell.

Remarks:
During inspection Targa updated PAP manual.

Mileage Covered by OQ Plan (by Company and State)

List each company and subsidiary separately, broken down by state (using 2-letter designation). If a company has intrastate and/or interstate mileage in several states, use <u>one row per state</u>. If there are both gas and liquid lines, use both the first and second table. For small gas operators (e.g. master meter, LP), use the third table.

Jurisdictional to Part 192 (Gas) Mileage

Company (Gas Operator)	Operator ID	State	Interstate Gathering	Intrastate Gathering	Interstate Transmission	Intrastate Transmission	Interstate Distribution*	Intrastate Distribution*	Remarks

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.

- 1 -

<div align="right">(To add rows, press TAB with cursor in last cell.)</div>

Jurisdictional to Part 195 (Hazardous Liquid) Mileage

Company (Liquid Operator)	Operator ID	State	Interstate Transmission	Intrastate Transmission	Remarks
Targa Sound Terminal	38921	WA		X	2.7 miles 10", gasoline and diesel

<div align="right">(To add rows, press TAB with cursor in last cell.)</div>

Jurisdictional to Part 192 (Gas) Mileage – Small Operators

Company (Small Gas Operator)	Operator ID	State	Small Gas (e.g., master meter)*	LP*	Remarks

<div align="right">(To add rows, press TAB with cursor in last cell.)</div>

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter n/a.
3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. * Please do not include Service Line footage. This should only be MAINS.

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).   .

- 2 -

1 - Document Program Plan, Implementing Procedures and Qualification Criteria

1.01 Application and Customization of "Off-the-Shelf" Programs
Does the operator's plan identify covered tasks and does it specify task-specific reevaluation intervals for individuals performing covered tasks?   **(Associated Protocols: 1.05, 2.01, 5.02)**

☒ *N*o Issues Identified	Inspection Notes:
	1. Could not review records, Targa Sound only operating for 2 months.
	2. Use 5 year as maximum reevaluations time. This is long time period.
	Targa given heads up only: page 3 of 25 is PHMSA not RSPA – 4-2-13 informed them
	Targa Resources OQ has 29 revisions. Only dates used on plan not revision numbers.
	Definition of 4 part test found on page 13 of 25
	Definition of evaluation found on page 16 of 25. Definition is not exact.
☐ Potential Issues Identified (explain)	The definition of pipeline facility as found in 195.2 was added to the PAP during the inspection. Its definition is pipeline facility means new and existing pipe, rights-of-way, and any equipment, facility, or building used in the
☐ N/A (explain)	transportation of hazardous liquids or

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   **- 3 -**

☐ Not Inspected	carbon dioxide. Any task out of normal activity will be performed by a contractor. This includes excavation and backfilling.
	Targa uses multiple knowledge evaluation, (CBTs) and one on one contact during on the job training,
	Targa Sound has 4 teams of 6 men each, they are called operators and operate entire the plant not just gas facility.
	Currently each team has one lead that is OQed for covered activities (Goal is to OQ all 24). Also Ted and Randy are OQed. Informed Targa Sound and Targa Resources that only having one person per shift OQed and using the Gas Supervisor as a backup is adequate but risky.
	Job matrix (page 21 of 25) is just the list of covered tasks. Tim has form called OQ Training summery that will be in the front of everyone's file to know what they are qualified for. Reviewed
	Targa Sound has only been operating for 2 months. Their long term goal is to train for all operational activities ie cathodic protection. This will eliminate need for some contractors.
	Currently, operator in control room when gas starts flowing. After that, there is always an operator at the facility; person can be anywhere in facility or r/w. If an alarm occurred they would be notified by text. Targa has direct line Nextel phone with Olympic so they are always in communication with source. Nextel phone is issued by Olympic so it is part of their communication system.
Check exactly one box above.	

1.02 Contractor Qualification
Does the operator employ contractor organizations to provide individuals to perform covered tasks? If so, what are the methods used to qualify these individuals and how does the operator ensure that contractor individuals are qualified in accordance with the operator's OQ program plan?

* Verify that the operator's written program includes provisions that require all contractor and subcontractor individuals be evaluated and qualified prior to performing covered tasks, unless the covered task is performed by a non-qualified individual under the direction and observation of a qualified individual. **(Associated Protocols: 1.05, 2.02, 3.02)**

	Inspection Notes:
☒ No Issues Identified	**Bullet 1:** page 4, requires all contractors and subcontractors to be evaluated and qualified prior to performing covered tasks unless the task is being performed by a non-qualified under the direction and observation of a qualified individual.
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	
	An Abnormal Operating Condition for integrity monitoring prior to restart of the pipeline after an earthquake in accordance with 480-75-660(1)(b). PAP updated during the inspection.
Check exactly one box above.	

1.03 Management of Other Entities Performing Covered Tasks

Has the operator's OQ program included provisions that require individuals from any other entity performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) be evaluated and qualified prior to task performance?

* Verify that other entities that perform covered task(s) on behalf of the operator are addressed under the operator's OQ program and that individuals from such other entities performing covered tasks on behalf of the operator are evaluated and qualified consistent with the operator's program requirements. **(Associated Protocols: 1.05, 2.02)**

	Inspection Notes: Mutual assistances not addressed in OQ. Targa would shut line down if trouble -no need for mutual assistance.
☒ No Issues Identified	
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	**Bullet 1:** Targa's OQ plan did not address mutual assistance; Targa updated Mergers and acquisitions on page 17 of 25 addresses mergers. PAP updated during the inspection.
Check exactly one box above.	

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.
- 5 -

1.04 Training Requirements (Initial Qualification, Remedial if Initial Failure, and Reevaluation)
Does the operator's OQ program plan contain policy and criteria for the use of training in initial qualification of individuals performing covered tasks, and are criteria in existence for re-training and reevaluation of individuals if qualifications are questioned? **(Associated Protocols: 5.02)**

	Inspection Notes:
☒ No Issues Identified	Page 18 Original Qualifications 16B - Lesson plan is training and evaluation, specific to local co, includes what knowledge and skills are required. Corporate has guidelines and lesson plans that co (Targa) can adopt. No corporate requirement but corporate maintains database of CBTs and sends them to co (Targa) for meeting minimum requirements (base requirements) Also use site specific training and hands on for specific and unique equipment.
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	
Check exactly one box above.	

1.05 Written Qualification Program
Did the operator meet the OQ Rule requirements for establishing a written operator qualification program and completing qualification of individuals performing covered tasks?
* Verify that the operator's written qualification program was established by April 27, 2001.
* Verify that the written qualification program identified all covered tasks for the operator's operations and maintenance functions being conducted as of October 28, 2002.
* Verify that the written qualification program established an evaluation method(s) to be used in the initial qualification of individuals performing covered tasks as of October 28, 2002.
* Verify that all individuals performing covered tasks as of October 28, 2002, and not otherwise directed or observed by a qualified individual were qualified in accordance with the operator's written qualification program.   **(Associated Protocols: 3.01, 7.01)**

	Inspection Notes:
☒ No Issues Identified	**Bullet 1:** Targa Sound is a new company and parent Targa Resources met date requirement
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	**Bullet 2:** Targa Sound is a new company and parent Targa Resources met date requirement
☐ Not Inspected	
	Bullet 3: Targa Sound is a new company and parent Targa Resources met date requirement
	Bullet 4: Reviewed OQ Qualification Review form #oq-0-02 is used for pipeline control receipt deliveries. Each task has own number based on task Number found in Appendix C
	Targa Sound is new but corporate (Targa Resources) was qualified in 2002 per code

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   - 6 -

Check exactly one box above.

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   *- 7 -*

2 - Identify Covered Tasks and Related Evaluation Methods

2.01 Development of Covered Task List
How did the operator develop its covered task list?
* Verify that the operator applied the four-part test to determine whether 49 CFR Part 192 or 49 CFR Part 195 O&M activities applicable to the operator are covered tasks.
* Verify that the operator has identified and documented all applicable covered tasks. **(Associated Protocols: 8.01)**

☒ No Issues Identified	Inspection Notes:
☐ Potential Issues Identified (explain)	**Bullet 1:** Is in house program, pg 13 is four part test which is applied to all tasks.
☐ N/A (explain)	
☐ Not Inspected	**Bullet 2:** Appendix C has all Targa Resources employee tasks including Targa Sound. Specialized tasks that contractors would be doing are not included. Comprehensive list of all covered tasks in Appendix C. Appendix D expands to reevaluation timeframes and span of control.
	Note: this inspection was done before the standard inspection and there may be required tasks that have not been identified. i.e. tasks for the break out tank and the control room.
Check exactly one box above.	

2.02 Evaluation Method(s) (Demonstration of Knowledge, Skill and Ability) and Relationship to Covered Tasks
Has the operator established and documented the evaluation method(s) appropriate to each covered task?
* Verify what evaluation method(s) has been established and documented for each covered task.
* Verify that the operator's evaluation program ensures that individuals can perform assigned covered tasks.
* Verify that the evaluation method is not limited to observation of on-the-job performance, except with respect to tasks for which OPS has determined that such observation is the best method of examining or testing qualifications. The results of any such observations shall be documented in writing. **(Associated Protocols: 3.01, 3.02)**

☒ No Issues Identified	Inspection Notes:
☐ Potential Issues Identified (explain)	**Bullet 1:** page 15 and 16 shows evaluation methods and processes. Evaluation is documented on Operator Qualification Evaluation form use task No. form from App C to identify specific tasks.
☐ N/A (explain)	
☐ Not Inspected	**Bullet 2:** Targa uses CBT and hands on for final testing

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   - 8 -

	Bullet 3: On the job evaluation questions asked using Operator Qualification Evaluation form. (oral examine)
Check exactly one box above.	

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.

- 9 -

2.03 Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals)

Does the operator have a process for managing qualifications of individuals performing covered tasks during program integration following a merger or acquisition (applicable only to operators engaged in merger and acquisition activities)?

* Verify that the OQ program describes the process for ensuring OQ qualifications, evaluations, and performance of covered tasks during the merger with or acquisition of other entities. **(Associated Protocols 3.01 3.02)**

	Inspection Notes:
☒ No Issues Identified	**Bullet 1:** Merger addressed in Section 10 of plan. Targa would use outside contractor procedure to determine if merger or acquisition tasks are the same. See mergers/acquisitions page 17 of 25
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	
Check exactly one box above.	

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   *- 10 -*

3 - Identify Individuals Performing Covered Tasks

3.01 Development/Documentation of Areas of Qualification for Individuals Performing Covered Tasks

Does the operator's program document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?

* Verify that the operator's qualification program has documented the evaluation of individuals performing covered tasks.

* Verify that the operator's qualification program has documented the qualifications of individuals performing covered tasks.   **(Associated Protocols: 4.02, 7.01)**

☒ No Issues Identified ☐ Potential Issues Identified (explain) ☐ N/A (explain) ☐ Not Inspected	Inspection Notes: **Bullet 1:** Documentation for knowledge on certificates of completion for CBTS is titled Targa Sound Terminal (task NO). Hands on tests are called evaluation statement. Reviewed. Currently Targa has 5qualified individuals to operate SCADA and start up or shut off the pipeline. **Bullet 2:** OQ evaluation form is tied to App C task Numbers
Check exactly one box above.	

3.02 Covered Task Performed by Non-Qualified Individual

Has the operator established provisions to allow non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?

* Verify that the operator's program includes provisions for the performance of a covered task by a non-qualified individual under the direction and observation by a qualified individual. **(Associated Protocols: 2.01, 2.02)**

☒ No Issues Identified ☐ Potential Issues Identified (explain) ☐ N/A (explain) ☐ Not Inspected	Inspection Notes: Targa updated the span of control in PAP Appendix D during the inspection. Targa was asked to keep in mind the preamble for the Operator Qualification rule discusses the need for qualified individuals to be in a position to take immediate action to correct deficiencies of non-qualified persons. Staff was concerned that on certain tasks a ratio of 1 to 4 or 5 may be too large. Staff informed Targa that this rule does not is not the same as having a supervisor observe his crew to ensure work is done properly (as Targa had believed).

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   **- 11 -**

	Targa Resources was given heads up regarding page 10 of 25, section 3.c should read "directed and observed by a qualified person not under proper direction and oversight from a qualified person". Targa's wording subtly changes the intent of the OQ rule.
Check exactly one box above.	

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   *- 12 -*

4 - Evaluate and Qualify Individuals Performing Covered Tasks

4.01 Role of and Approach to "Work Performance History Review"

Does the operator use work performance history review as the sole method of qualification for individuals performing covered tasks prior to October 26, 1999, and does the operator's program specify that work performance history review will not be used as the sole method of evaluation for qualification after October 28, 2002?

* Verify that after October 28, 2002, work performance history is not used as a sole evaluation method.
* Verify that individuals beginning work on covered tasks after October 26, 1999 have not been qualified using work performance history review as the sole method of evaluation. **(Associated Protocols: 2.02)**

	Inspection Notes:
☒ No Issues Identified	**Bullet 1 and 2:** Parent company Targa Resources was in compliance. Targa Sound Terminal started moving product in Jan of 2013
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	
Check exactly one box above.	

4.02 Evaluation of Individual's Capability to Recognize and React to AOCs

Are all qualified individuals able to recognize and react to AOCs? Has the operator evaluated and qualified individuals for their capability to recognize and react to AOCs? Are the AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task? Has the operator established provisions for communicating AOCs for the purpose of qualifying individuals?

* Verify that individuals performing covered tasks have been qualified in recognizing and reacting to AOCs they may encounter in performing such tasks. **(Associated Protocols 3.01)**

	Inspection Notes:
☒ No Issues Identified	**Bullet 1:** Operator Evaluation form cross references to App C task numbers.
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	
Check exactly one box above.	

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   **- 13 -**

5 - Continued/Periodic Evaluation of Individuals Performing Covered Tasks

5.01 Personnel Performance Monitoring
Does the operator's program include provisions to evaluate an individual if the operator has reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?
* Verify that the operator's program ensures re-evaluation of individuals whose performance of a covered task may have contributed to an incident or accident.
* Verify that the operator has established provisions for determining whether an individual is no longer qualified to perform a covered task, and requires reevaluation.
(Specific Protocols: 2.02)

	Inspection Notes:
☒ No Issues Identified	**Bullet 1:** page 19 addresses disqualification for reasonable cause. Personnel requiring Post incident D&A testing would immediately be disqualified until investigated.
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	
	Bullet 2: page 20 is the disqualification due to Reasonable Cause section
Check exactly one box above.	

5.02 Reevaluation Interval and Methodology for Determining the Interval
Has the operator established and justified requirements for reevaluation of individuals performing covered tasks?
* Verify that the operator has established intervals for reevaluating individuals performing covered tasks. **(Associated Protocols: None)**

	Inspection Notes:
☒ No Issues Identified	**Bullet 1:** Appendix D has formula based on level of risk, complexity & special knowledge. Page 22 of 25
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	
☐ Not Inspected	
Check exactly one box above.	

6 - Monitor Program Performance; Seek Improvement Opportunities

6.01 Program Performance and Improvement
Does the operator have provisions to evaluate performance of its OQ program and implement improvements to enhance the effectiveness of its program?
(Associated Protocols: None)

<table>
<tr>
<td>
☒ No Issues Identified

☐ Potential Issues Identified (explain)

☐ N/A (explain)

☐ Not Inspected
</td>
<td>
Inspection Notes:
Section 14 is communication of change and page 20 addresses incident involvement (reevaluates plan to see if modification required).

To enhance the effectiveness, periodic review of the OQ Plan is conducted, page 12
</td>
</tr>
<tr>
<td colspan="2">Check exactly one box above.</td>
</tr>
</table>

7 - Maintain Program Records

7.01 Qualification "Trail"(i.e., covered task; individual performing; evaluation method(s); continuing performance evaluation; reevaluation interval; reevaluation records)
Does the operator maintain records in accordance with the requirements of 49 CFR 192, subpart N, and 49 CFR 195, subpart G, for all individuals performing covered tasks, including contractor individuals?
* Verify that qualification records for all individuals performing covered tasks include the information identified in the regulations.
* Verify that the operator's program ensures the retention of records of prior qualification and records of individuals no longer performing covered tasks for at least five years.
* Verify that the operator's program ensures the availability of qualification records of individuals (employees, contractors and third party entities) currently performing covered tasks, or who have previously performed covered tasks. (**Associated Protocols: 1.05, 3.01**)

☒ No Issues Identified	Inspection Notes: **Bullet 1:** have 5 people currently qualified. Reviewed records.
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	**Bullet 2:** Targa only has been in operations for 2 months. Have plan and documentation for 5 qualified operators. Plan is to OQ all 6 individuals working on every shift.
☐ Not Inspected	
	Bullet 3: Currently, only contractor is for locates. Currently Targa Resources has contractor records for Targa Sound. Targa Sound will have access by June 2013. This is currently just a matter of getting passwords etc but information always also available from Texas Resources. Contractor records are kept in the contract work packages and are available for inspection.
Check exactly one box above.	

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   **- 16 -**

8 - Manage Change

8.01 Management of Changes (to Procedures, Tools, Standards, etc.)
Does the operator's OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?
* Verify that the operator's program identifies changes that affect covered tasks and how those changes are communicated, when appropriate, to affected individuals.
* Verify that the operator's program identifies and incorporates changes that affect covered tasks.
* Verify that the operator's program includes provisions for the communication of changes (e.g., who, what, when, where, why) in the qualification program to the affected individuals.
* Verify that the operator incorporates changes into initial and subsequent evaluations.
* Verify that contractors supplying individuals to perform covered tasks for the operator are notified of changes that affect task performance and thereby the qualification of these individuals.
(Associated Protocols 1.04)

☒ No Issues Identified
☐ Potential Issues Identified (explain)
☐ N/A (explain)
☐ Not Inspected
	Inspection Notes:
	Bullet 1: Reviewed page 21 of 25. The OQ manual procedure is for Targa Resources. Targa Resources does not want local company information in the OQ manual.
	
	No Management Of Change communication from corporate, Targa Resources, or local company since start up 1-2013.
	
	  PAP updated during the inspection, Targa resources included Targa Resources Management of Change (MOC) in Targa OQ Plan so that Targa Sound had a method to document MOC notifications, a documented procedure to review and incorporate changes and new task into initial and subsequent evaluations is in place.
	
	  Targa Sound committed to have documentation of notification that was mailed by corporate and/or by Targa Sound, and a method to document that each individual received and understood the notification.
	
	Bullet 2: Targa Resources identifies and incorporates changes into OQ manual.
	
	Bullet 3: Targa Resources OQ Plan states all significant changes would be communicated.
	
	Targa Resources has a maximo program for all purchase orders, specific equipment and change orders. This is one place where

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   **- 17 -**

	significant changes are noticed.
	Bullet 4: PAP updated during the inspection
	Bullet 5: NO Management Of Change communication for contractor since start up 1-2013.
	Since start up no MOC issued for contractor. Targa PAP updated OQ during the inspection to include contractor MOC.
Check exactly one box above.	

8.02 Notification of Significant Program Changes
Does the operator have a process for identifying significant OQ written program changes and notifying the appropriate regulatory agency of these changes once the program has been reviewed?
* Verify that the operator's written program contains provisions to notify OPS or the appropriate regulatory agency of significant modifications to a program that has been reviewed for compliance.
(Associated Protocols: None)

	Inspection Notes:
☒ No Issues Identified	OQ Plan does not have revision dates
☐ Potential Issues Identified (explain)	
☐ N/A (explain)	Appendix A and B were archived, see table of content, they were combined into app C
☐ Not Inspected	
	Bullet 1. Page 12
	PAP updated during the inspection, Targa Resources added UTC to mailing list on page 12 of 25.
Check exactly one box above.	

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   **- 18 -**

9 – Field Inspection Findings

Additional Inspection Notes

1. Wholesale changes were made to the OQ Plan to improve program performance, and due to merging plans.

PHMSAForm-14 (192.801, 195.501) Operator Qualification Inspection Form, Rev 6 (Rev. 03/22/2011).

.   *- 19 -*