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	6754		
Inspector Name & Submit Date	Dennis Ritter Scott Anderson		
Chief Engineer Name & Review Date	Joe Subsits, 10/17/2016		
Operator Information			
Name of Operator:	McChord Pipeline Co	**OPID #:**	31049
Name of Unit(s):	McChord Pipeline Co		
Records Location:	Tacoma, WA		
Date(s) of Last Review:	5/21/2014, Dave Cullom, WUTC	**Inspection Date(s)**	8/8-8/10/16, 10/11/16

Inspection Summary:

(Background data from AJ inspection) The McChord Pipeline is a buried intrastate pipeline 14.25 miles in length, constructed in 1966 with 6-inch nominal steel pipe grade B, wall thickness of 0.188 inch to 0.432 inch. The pipeline has a 720 psig MOP (36% SMYS) with a normal operating pressure at 450 psig (21% SMYS). The pipeline is divided into four sections with isolation valves between each section. The entire pipeline is within a HCA with about 400 foot elevation differential. The pipeline transports jet fuel from US Oil Refinery located in Tacoma near Commencement Bay to the McChord Air Base storage facility. Jurisdiction begins at the pump suction valves (P-1401) and ends at the custody transfer manifold valves downstream of the meters at McChord Air Force Base. The pipeline was hydrostatically tested in 1996, inline inspected in 2004 (GE pig), MFL pig completed in 2009 and Baker Hughes ran a calibration pig and a MFL tool in 2013.

8/08/16-Inspection start date. Arrived on site with Scott Anderson. Reviewed purpose of inspection and general overview of week. Today and tomorrow will be focused on records, with a field day on Wednesday.
Reviewed records as noted below to answer questions in checklist. No deficiencies noted.
8/08/16-Continued answering questions. No deficiencies noted.
8/09/16-Field review of assets (see OQ Form 15). No deficiencies noted, however, suggested additional markers along pipeline route would be a good preventative measure.

NOTE: The pumping station was previously (during Buckeye's ownership?) determined to be not regulated. It is not known why this determination was made. The station is owned by US Oil and Refining. However, upon further investigation, it appears that it should be part of the regulated pipeline. See PHMSA guidance drawings 9 and 12 which show similar pipe-pump station configurations as McChord. This pump station is dedicated to and provides the kinetic energy to move the refined products to McChord AFB (approximately 410' of vertical head). The pig launcher/receiver is also in the pump station. As such the pump station question is regulated and will be considered part of this inspection.

Findings:
No probable violations were noted during the inspection. The only issue discussed was adding more markers in along the pipeline route. Existing markers were present and met code, but the more markers, the more the public knows the line is there—especially in the neighborhoods around Midland and Parkland. These are very densely populated areas and additional markers would only help with the awareness message.

HQ Address:	**System/Unit Address:**

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3001 Marshall Avenue Tacoma, WA 98421			
Co. Official:	Daniel H. Yoder	**Phone No.:**	
Phone No.:	253-680-3220	**Fax No.:**	
Fax No.:		**Emergency Phone No.:**	
Emergency Phone No.:	253-593-6085		

Persons Interviewed	Title	Phone No.
Nicholas Peelo	Chief Engineer	253-680-6658
John Williamson	Senior Inspector	253-593-6085
Brady Winder	Engineering Manager	253-377-0915
Marcia Nielsen	Human Resources	253-680-3241

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:	
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	8/11/2015

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. Note, only HR knew number of employees and pool total for random drug testing.	x			

OIL POLLUTION ACT	Yes	No
Have you submitted your spill response plan to PHMSA for review? 11/2/2015 submission date to PHMSA	x	

Comments:

RECORDS REVIEW			S	U	NA	NC
CONVERSION TO SERVICE No conversions						
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	

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RECORDS REVIEW			S	U	NA	NC
4.		Pipeline Testing			x	
5.		Pipeline Repairs			x	
6.		Pipeline Replacements			x	
7.		Pipeline Alterations			x	
REGULATED RURAL GATHERING LINES No gas 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	

Comments:

LOW-STRESS PIPELINES IN RURAL AREA No low stress pipelines			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	

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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:

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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? March 15, 2016	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? No issues	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. 3/8/16 latest submission	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). No notices, no incidents			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://portal.phmsa.dot.gov/pipeline (Amdt. 195-95, 75 FR 72878, November 26, 2010). No accidents			x	
22.	**195.54 (b)**	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) No accidents			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)) No SRCR			x	
24.	**195.56(b)**	SRC Report requirements, including corrective actions (taken and planned) No SRCR			x	
25.	**195.57**	Do records indicate reports were submitted within 60 days of completing inspection of underwater pipelines? 195.413(a) (195.57) No SRCR			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? None			x	
27.	**195.64**	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline (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 No new construction since last inspection			x	
29.	**480-75-620**	Was MOP changed based on hydrotest? Report submitted? No			x	
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; No incidents 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.			x	

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31.	**480-75-630(2)**	Written reports to the commission within 30 calendar days of the incident. The report must include the following: No incidents 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.			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. No emergency situations			x	
33.	**480-75-630(4)**	**Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013)** **(**Via the commission's Virtual DIRT system or on-line damage reporting form)				
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) US Oil has not had to use DIRT as no incidents, but do discuss with contractors.	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? US Oil has not had to use DIRT as no incidents, but do discuss with contractors.	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? None since last inspection **Note:** Records maintained for two years and made available to the commission upon request.			x	
37.	**480-75-630(5)**	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? **US Oil has not had to use DIRT as no incidents, but do discuss with contractors.**				
38.	**480-75-630(5)(a)**	• Notification requirements for excavators under RCW 19.122.050(1)			x	
39.	**480-75-630(5)(b)**	• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and			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.			x	
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 hazardous liquid pipeline facilities. 630(6)(b)	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) No construction since last inspection			x	

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43.	**195.214(b)**	Detailed Test Results to Qualify Welding Procedures and Qualifying tests No construction since last 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). No construction since last inspection			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. No construction since last inspection			x	
46.	**195.226(a)**	Arc burns must be repaired. No construction since last inspection			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)**. No construction since last inspection			x	
48.	**195.226(c)**	The ground wire may not be welded to the pipe/fitting being welded. No construction since last inspection			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? Maintenance Manual B-3 7.2.2	x			
50.	**195.234(b)**	Nondestructive testing of welds performed: No construction since last inspection (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			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? No construction since last inspection			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? No construction since last inspection			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? No construction since last inspection			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--MPL Re-route construction-2/15/2000 (Hwy 509 construction)				
56.	**195.266(b)**	Amount, Location, Cover of each Size of Pipe Installed ATLAS-mapping shows all asbuilts of pipeline, including the 2000 reroute.	x			
57.	**195.266(c)**	Location of each Crossing with another Pipeline ATLAS-mapping shows all asbuilts of pipeline, including the 2000 reroute.	x			
58.	**195.266(d)**	Location of each buried Utility Crossing ATLAS-mapping shows all asbuilts of pipeline, including the 2000 reroute.	x			
59.	**195.266(e)**	Location of Overhead Crossings ATLAS-mapping shows all asbuilts of pipeline, including the 2000 reroute.	x			
60.	**195.266(f)**	Location of each Valve and Test Station ATLAS-mapping shows all asbuilts of pipeline, including the 2000 reroute.	x			
PRESSURE TESTING			**S**	**U**	**NA**	**NC**

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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). No construction since last inspection. Looked at: • Pre Acquisition Hydro test of entire pipeline,1996. Contractor Snelson Inc. Actual pressure 1170 psi. Chart OK, pressure log OK, 410 feet of head differential, OK. • MPL Re-route construction-2/15/2000 (Hwy 509 construction). MPL Section G-3, Pg 17, Maintenance Form. Pressure Piping Hydrostatic Test Record. Sta 603+22 to 549+15. Certified pressure 1170 psi and chart for temp and pressure. OK	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 <u>other than those described above</u> been pressure tested per Subpart E?	x			
64.		If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under **195.406(a)(5),** in accordance with **.302(c)? All tested under Subpart E**			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. 2 hr leak test, 8 hr strength test	x			
66.	**195.305(a)**	All pipe, all attached fittings, including components, must be pressure tested in accordance with **195.302**. Class 300 flanges determine the MOP of pipeline. **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.	x			
67.	**195.305(b)**	Manufacturer testing of components. Records available and adequate? P&IDs, ATLAS, project files	x			
68.	**195.306**	Appropriate test medium	x			
69.	**195.308**	Pipe associated with tie-ins pressure tested? MPL Re-route construction-2/15/2000 (Hwy 509 construction). MPL Section G-3, Pg 17, Maintenance Form. Pressure Piping Hydrostatic Test Record. Sta 603+22 to 549+15. Certified pressure 1170 psi. and chart for temp and pressure. OK	x			
70.	**195.310(a)**	Pipeline Test Records for useful life of facilities? • MPL Re-route construction-2/15/2000 (Hwy 509 construction). MPL Section G-3, Pg 17, Maintenance Form. Pressure Piping Hydrostatic Test Record. Sta 603+22 to 549+15. Certified pressure 1170 psi. and chart for temp and pressure. OK • Pre Acquisition Hydro test of entire pipeline, Contractor Snelson Inc. Actual pressure 1170 psi. Chart OK, pressure log OK, 410 feet of head differential, OK.	x			
71.	**195.310(b)**	Do test records required by paragraph (a) include:				
72.	**195.310(b)(1)**	Pressure recording charts	x			

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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. None			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 1996 pre-acquisition pressure test (Buckeye), Snelson Inc. Have pipeline profile, showing valve locations but not specific to pressure test. Elevation differential is 410'.	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-VECO MPC Maximum Operating Pressure Letter, 8/20/2009**	x			

OPERATION & MAINTENANCE			**S**	**U**	**NA**	**NC**
82.	**195.402(a)**	Annual Review of O&M Manual (**1 per yr/15 months**) 12/21/15 last revision	x			
83.		Appropriate parts must be kept at locations where O&M activities are conducted	x			
84.	**195.402(c)(4)**	Determination of Areas requiring immediate response for Failures or Malfunctions Entire line is in a HCA so immediate response is required for all failures. OPS Manual Section 4. 2000 gallon discrepancy in mass balance shuts down pipeline (1% for 5000 bbl transfer-typical)	x			
85.	**195.402(c)(5)**	Pipeline accidents analyzed to determine their causes No accidents			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. No abandoned facilities Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per **195.59**			x	
87.	**195.402(c)(12)**	Establishment/Maintaining liaison with Fire, Police, and other Public Officials PA program and annual mailing including city, county and elected officials. FD on site 2-3 times per year, send 2 TFD to Texas A&M fire fighting school annually.	x			
88.	**195.402(c)(13)**	Periodic review of personnel work – effectiveness of normal O&M procedures and corrective action when deficiencies are found-happens during annual procedures review and as needed.	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). Control Room inspection done in 3/2014 by UTC	x			

90.	**195.402(e)(1)**	Records that indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures. none			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 none			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)? none			x	
93.	**195.402(e)(9)**	Post accident review of employees' activities to determine if procedures were effective and corrective action was taken? No events to trigger action			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). No events to trigger action			x	
95.	**195.403(a)**	Records of operator provided training to its emergency response personnel as required Pumper/Gauger-Lawrence Erhardt, Emergency Response training records	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**)	x			

Comments:

OPERATION & MAINTENANCE (Cont)			**S**	**U**	**NA**	**NC**
98.	**195.403(c)**	Verification of supervisor knowledge of emergency response procedures (**1 per yr/15 months**) Checked Mathew Daniels, Shift Supervisor, Emergency Response for ERT-Fire Fighting 2/9/16; 1/15/15	x			
99.	**195.404(a)(1)**	Maps and Records of the following facilities maintained and made available: ATLAS and P&IDs 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. ATLAS and P&IDs	x			
101.	**195.404(a)(3)**	The maximum operating pressure of each pipeline in accordance with 195.406 VECO MPC Maximum Operating Pressure Letter, 8/20/2009, US Oil & Refining Memo 10/22/98 from GA Hills. MOP 720 psig based on Cl 300 flanges.	x			

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102.	**195.404(a)(4)**	The diameter, grade, type, and nominal wall thickness of all pipe. MPL Re-route construction-2/15/2000 (Hwy 509 construction) MTR 31937 record showing manufacturer Lonestar Steel Co., Lonestar, TX, pipe spec API 5L, Pipe grade-X42, and chemical analysis.	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 No emergencies since last inspection			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. Annual drills and procedure updates.	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**. • MPL Re-route construction-2/15/2000 (Hwy 509 construction) • Smart pig extraction 2009. Pig stuck in a bend at 72nd and Waller Rd. Anvil was NDE contractor for two W-1 and W-1 tie in welds both were acceptable. Jared Sims NDT tech, Jake Zourkos, welder passed 7/13/09. • 57th and Waller Rd ILI Dig 1/19-22/2015 Dent on top of pipe. Repair was a clockspring.	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**. See question 105	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**. See question 105	x			
108.	**195.406(a)/ .406(a)(1)**	Except for surge pressures and other variations from normal operations, no operator shall operate a pipeline above the MOP, and the MOP may not exceed any of the following; Checked MOP records for PT-1407 (pipeline just before goes underground by fence) back to Jan 2012 in McChord's "PI" historian database. Noted two exceedances where pressure exceeded MOP to 820 psi. Both of these exceedances were days where PT instrument was calibrated. PT is isolated from line pressure when this calibration occurs so line does not see this pressure, just the instrument. • The internal design pressure of the pipe determined by **195.106**.	x			
109.	**480-75-620**	Change in MOP? Changed based on hydrotest? None			x	
110.	**195.408(b)**	Records indicating emergency communication system(s) use was as required none			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 Maximo records OK back to 2012-required to perform 26/yr actually do almost weekly. Looked at completed records for 1/20/16 and 8/3/16. Also does rectifier reads on patrol.**	x			
112.	**195.412(b)**	Records indicating ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed looked at markers at road crossings per 195.410(a)(1) to see if any additional markers are warranted (no deficiencies noted)	x			
113.	**480-75-640**	Depth of cover surveys and mitigation-line was constructed prior to April 1, 1970. ILI run in 2013 gave depth of cover. No issues noted			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. Looked back to 2012 OK	x			
115.	**480-75-500**	Pipe movement study per API 1117 None			x	
116.	**195.428(a)**	Insp. of overpressure safety devices (**1 per yr/15 months** non-HVL; **2 per yr/7½ months** HVL) McChord does not have overpressure protection devices for pumping product. They use pumps which are incapable of producing high enough head to overpressure line. Looked at Afton Engineering Pump curve for Afton Vertical can pump 4/16/66. Highest head at 1750 ft 0 gpm. This is 795 psi but pumping jet fuel which is 80% density of water—636 psi which is less than 720 psi. Typical operating pressure is 450 psi. High pressure switch on pump is 550 psi (shuts off pump). Looked at thermal relief records—RV 1412, 1414, 1413 at US Oil, RV 1406, 1403,1402 at McChord.	x			
117.	**195.428(b)**	Inspection of Relief Devices on HVL Tanks (intervals NTE **5 yrs**). No HVLs			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. No breakout tanks. VECO surge analysis shows no need for surge tank as does not reach MOP. 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.			x	
119.	**195.428(d)**	Inspection of Overfill Systems (**1 per yr/15 months** non-HVL; **2 per yr/7½ months** HVL) No breakout tanks			x	
120.	**480-75-300 (3)**	Leak detection and alarm records No breakout tanks			x	
121.	**480-75-320**	Surge analysis done? VECO 8/25/99 720psig MOP confirmed MPC	x			
122.	**195.430**	Inspection of Fire Fighting Equipment Note: no breakout tank. No fire fighting equipment at valve stations.	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 None**			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 June 6, 2005. After effectiveness review, send mailings out annually to all audiences.		x			
		API RP 1162 Baseline* Recommended Message Delivery Frequencies				
		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				
		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. Only English, as currently predominant language.	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:

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Comments:

		DAMAGE PREVENTION PROGRAM	S	U	NA	NC
127.	195.442(a)	Records indicating the damage prevention program is being carried out as written. McChord is part of 811. Reviewed one-call tickets Jan, March, July 2016. Paradigm is contractor who puts together mailings.	x			
128.	195.442(c)(1)	List of Current Excavators Paradigm annually updates this list.	x			
129.	195.442(c)(2)	Notification of Public/Excavators	x			
130.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records)	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.	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.	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? McChord has person onsite during all construction activity—I-5 project in Tacoma at Puyallup River Bridge.	x			
135.		2. In the case of blasting, does the inspection include leakage surveys? (required) none			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? Have not had any failures or any other accidents.			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? John Williamson, Task MPL Task 07, Inspect Rectifier, 10/21/17, right of way patrol, valve inspection and operation	x			
139.	195.507(a) .507(b)	Are qualification records available for contractor personnel that contain the required elements? Reviewed smart pig extraction 2009. Pig stuck in a bend at 72nd and Waller Rd. Anvil was NDE contractor for two W-1 and W-1 tie in welds both were acceptable. Jared Sims NDE tech, Jake Zourkos, welder passed 7/13/09.	x			

Comments:

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CPM SYSTEMS McChord does not utilize a CPM leak detection system			S	U	NA	NC
140.		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 Do not use a CPM leak detection system				
141.	195.444	**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:

CORROSION CONTROL			S	U	NA	NC
145.	195.589(c) 195.555	Supervisors maintain thorough knowledge of corrosion procedures. Maintenance Manual D6, 1.5, Looked at annual PM 1729 corrosion control annual review.	x			
146.	195.589(c) 195.567(c)	Test lead maintenance / Frequent enough intervals Northwest Corrosion does annual CP survey and will determine if leads are OK. So far, none have failed.	x			
147.	480-75-510	Corrosion remediation within 90 days No corrosion requiring remediation			x	
148.	195.589(c) 195.569	Inspection of Exposed Buried Pipelines (External Corrosion) • 57th and Waller Rd ILI Dig 1/19-22-2015 Dent on top of pipe. Repair was a clockspring.	x			
149.	195.589(c) 195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (**1 per yr/15 months**) Looked at 7/11/16, 8/18/15, 8/12/14 No issues	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? Done every 5 years. Last on completed 9/2013 by Northwest Corrosion. No issues	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**) None			x	
152.	195.589(c) 195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers none			x	
153.	195.589(c) 195.573(e)	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control? No deficiencies			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 no interference currents found	x			

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156.	**195.589(c) 195.579(a)**	Corrosive effects investigation none, corrosion inhibitor in fuel per Air Force spec	x			
157.	**195.589(c) 195.579(b)**	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (**2 per yr/NTE7½ months**) None			x	
158.	**195.589(c) 195.579(b)(1-3)**	Corrosion inhibitors used in sufficient quantities No corrosion noted-Air Force requires	x			
159.	**195.589(c) 195.579(a)(c)**	Inspection of Removed Pipe for Internal Corrosion Removed pipe in 2009 to rescue stuck ILI tool. Checked for internal corrosion. None found	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**) Check atmospheric every week with R/W patrol. Paint as necessary.	x			
161.	**195.589(c) 195.585(a)**	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG None			x	
162.	**195.585(b)**	Localized Corrosion Pitting – replace, repair, reduce MOP None			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.) None			x	

Comments:

FIELD REVIEW			**S**	**U**	**N/A**	**N/C**
164.	**195.262(a)**	Has adequate ventilation been provided at pump station buildings? No building			x	
165.	**195.262(a)**	Have warning devices that warn of the presence of hazardous vapors been installed at new pump station buildings? No new building			x	
166.	**195.262(b)**	Has a device for activating emergency shutdown of the pump station been installed? There is an ESD in the control room with on a UPS. There are remote pump start/stop switches at the pump station to control locally.	x			
167.	**195.262(b)**	If power is needed to actuate safety devices, has an auxiliary power supply been provided? No aux power necessary to operate			x	
168.	**195.262(b)**	Have safety devices been installed to prevent over-pressuring new or modified pumping equipment? No new 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? Pump station is inside refinery.	x			
170.	**195.262(e)**	Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps? Refinery owns fire fighting equipment			x	
171.	**195.302**	Is pressure testing being adequately conducted? (.304, .305, .306, .307) no pressure testing during inspection			x	
172.	**195.308**	Pre-pressure Testing Pipe - Marking and Inventory marked in yard at refinery	x			
173.	**195.402(c)(13)**	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site. No excavations witnessed during inspection			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 valve station at MP 2.5 is only above ground part of pipeline outside of operator's control	x			
177.	**195.412**	Are the ROW conditions acceptable for the type of patrolling used?	x			

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FIELD REVIEW			S	U	N/A	N/C
178.	**195.420 (a), (b)**	Valve Maintenance & Operation	x			
179.	**195.420(c)**	Valve Protection from Unauthorized Operation and Vandalism Cyclone fence, locked with razor wire.	x			
180.	**195.426**	Are launchers and receivers equipped with relief devices? MOP pressure gauge port and bleed line	x			
181.	**195.428(a)**	Are inspections of overpressure safety devices adequate (including HVL lines)? Only pressure relief equipment are thermal reliefs at both McChord and US Oil. Operating pressure is limited by pump hydraulics. Can't pump to MOP.	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? None			x	
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.] None			x	
184.	**480-75-320**	Relief Device set at or below No relief devices, pump does not pump to MOP. Thermal reliefs in place, did not check set points in field.			x	

Comments:

FIELD REVIEW (Cont)			S	U	N/A	N/C
185.	**480-75-300**	Leak Detection – 8% in 15 Minutes Did not check leak detection system. Use mass balance system with meter's and pressure gauges at each end of pipeline.				x
186.	**480-75-300**	Leak detection at flow and no flow conditions Did not check leak detection system. Witnessed shut in conditions at pump station. Pressure gauge did not move in 15 minutes on site.				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)) No breakout tanks. Pump station owned and operated by US Oil & Refining.	x			
188.	**195.432**	Breakout Tanks No breakout tanks			x	
189.	**480-75-330**	Do Breakout Tanks have independent overfill alarms? No breakout tanks			x	
190.	**195.434**	Are there operator signs around each pumping station, breakout tank area, and other applicable facilities? Above ground valve MP 2.5.	x			
191.	**195.436**	Security - Pumping Stations - Breakout Tanks Pump station is inside secure area in refinery.	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? Above ground valve MP 2.5.	x			
193.	**195.446(a)**	Is the SCADA display representative of the system configuration? 195.404(a) (195.505(f); 195.446(h)) SCADA display does not represent system configuration. Use a screen set up similar to the refinery screens to monitor as refinery controllers control the pipeline.	x			
194.	**195.446(b)**	Do operating personnel know the MOP of respective pump stations and associated alarm settings? Referred to alarm set point. Controller operates pipeline (batch flow) and refinery. As pump cannot reach MOP and surge analysis shows MOP will not be reached with a slam shut of valve, controller uses shut off head of pump for alarm setting.	x			
195.	**195.446(h)**	Do controllers demonstrate adequate skills and knowledge? 195.505(b) (195.446(g)(2))	x			

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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** N Per Zach Barrett, 6/30/16 email, hold on sending until replacement for Stanley K. is found.				
197.	**195.571**	Cathodic Protection (test station readings, other locations to ensure adequate CP levels) Note: WUTC took readings for CP as operator's corrosion engineer was not available. No issues noted	x			
198.	**195.573**	Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly? (reviewed annual CP reports)	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)) Isolation flange kit at pump station	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)) Above ground valve MP 2.5.	x			

Comments:

Recent PHMSA Advisory Bulletins (Last 2 years)

Number	Date	Subject
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-12-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-12-09	Oct 11, 12	Communication During Emergency Situations
ADB-12-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
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 -12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation

For more PHMSA Advisory Bulletins, go to http://phmsa.dot.gov/pipeline/regs/advisory-bulletin