

Inspection Output (IOR)

Generated on 2020.June.09 12:04

Inspection Information

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|---|--|--|
| Inspection Name McChord IMP Inspection | Operator(s) MCCHORD PIPELINE CO. (31049) | Plan Submitted 01/03/2020 |
| Status PLANNED | Lead David Cullom | Plan Approval 01/08/2020 by Joe Subsits |
| Start Year 2020 | Observer(s) Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi | All Activity Start 05/26/2020 |
| System Type HL | Supervisor Joe Subsits | All Activity End 05/29/2020 |
| Protocol Set ID HL.2020.01 | Director Sean Mayo | Inspection Submitted -- |
| | | Inspection Approval -- |

Inspection Summary

No probable violations or areas of concern were noted during this inspection.

McChords integrity management program considers all of its pipeline to be in a HCA or a HCA CA given it's location and proximity to HPAs, CNWs, ecological and drinking water USAs.

Annual Reports reviewed for 2018 and 2019. LF Pre-70 ERW mileage is at 13.25. The remaining 1 mile is not LF Pre-70 ERW.

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. A one mile reroute was performed in 1996. 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 has 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), and MFL runs were completed in 2009, 2014 and 2019. Prior to each run they evaluate the tool to make sure complementary technologies are used. Tuboscope was used in 1996. GE used UT in 2004. In 2005, there was a pressure cycle analysis done by Kiefner and Assoc. along with the LF Pre-70 ERW study. In 2009, a MFL pig was run by Baker Hughes.

Threats, such as seam integrity due to low frequency pre-1970 ERW pipe and also third party damage, were discussed and documentation reviewed. Keifner and Associates also performed a study on the seam threat and ruled it out as a major threat to the system's safe operation. In regards to the third party damage threat, the August 2, 2017 incident (Sefnco) was discussed along with the prompt detection of the leak by the CPM. The quick shutdown and response time by the operator were also discussed.

Scope (Assets)

| # | Short Label | Long Label | Asset Type | Asset IDs | Excluded | Topics | Planned | Required | Inspected | Total | Required |
|----|-------------|-------------------------------|------------|-----------|----------|--------|---------|----------|-----------|-------|----------|
| | | | | | | | | | | % | Complete |
| 1. | 88980 (72) | McChord Pipeline Company unit | | 88980 | -- | | 142 | 142 | 142 | 142 | 100.0% |

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

Plans

| Plan # | Assets | Focus Directives | Involved Groups/Subgroups | Qst Type(s) | Extent | Notes |
|--------|------------|-----------------------------|--|-------------|--------|-------|
| 1. | 88980 (72) | HL IM Implementation, HL IM | AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC | P, R, O, S | Detail | |

Plan Implementations

| Activity # Name | SMART Act# | Start Date End Date | Focus Directives | Involved Groups/Subgroups | Assets | Qst Type(s) | Planned | Required | Total Inspected | Required % Complete |
|-------------------|------------|--------------------------|------------------|---------------------------|------------|-------------|---------|----------|-----------------|---------------------|
| 1. IMP Inspection | -- | 05/26/2020 05/29/2020 | n/a | all planned questions | all assets | all types | 142 | 142 | 142 | 100.0% |

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

This inspection has no Form data entry.

Results (all values, 142 results)

153 (instead of 142) results are listed due to re-presentation of questions in more than one sub-group.

AR.EC: External Corrosion Direct Assessment (ECDA)

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

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

Assets Covered **88980 (72)**

Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

No such event occurred, or condition existed, in the scope of inspection review.
2. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.P, 195.505 (195.452(f)(8), 195.555)**

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

Assets Covered **88980 (72)**

Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

No such event occurred, or condition existed, in the scope of inspection review.
3. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.R, 195.507 (195.452(l)(1), 195.555)**

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

Assets Covered **88980 (72)**

Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

No such event occurred, or condition existed, in the scope of inspection review.
4. Question Result, ID, References **NA, AR.EC.ECDAPLAN.P, 195.588(b)(1) (195.588(b)(2) - (5), 195.452(f)(5), 195.452(j)(5)(iii))**

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

Assets Covered **88980 (72)**

Result Notes McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILLI.

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

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

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

Assets Covered 88980 (72)

Result Notes McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILLI.

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

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

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

Assets Covered 88980 (72)

Result Notes McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILLI.

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

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

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

Assets Covered 88980 (72)

Result Notes McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILLI.

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

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

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

Assets Covered 88980 (72)

Result Notes McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILLI.

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

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

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

Assets Covered 88980 (72)

Result Notes McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILLI.

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

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

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

Assets Covered 88980 (72)

Result Notes McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILLI.

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

11. Question Result, ID, References **NA, AR.EC.ECDADIRECT.O, 195.588(b)(4) (195.588(b)(1), 195.452(b)(5), 195.452(f)(5),)**
 Question Text *Were ECDA direct examinations conducted in accordance with the plan?*
 Assets Covered **88980 (72)**
 Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

 No such event occurred, or condition existed, in the scope of inspection review.
12. Question Result, ID, References **NA, AR.EC.ECDAANALYSIS.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(j)(5)(iii))**
 Question Text *Do the records indicate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely?*
 Assets Covered **88980 (72)**
 Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

 No such event occurred, or condition existed, in the scope of inspection review.
13. Question Result, ID, References **NA, AR.EC.ECDAPLANMOC.P, 195.588(b)(4)(iii) (195.452(f)(4))**
 Question Text *Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?*
 Assets Covered **88980 (72)**
 Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

 No such event occurred, or condition existed, in the scope of inspection review.
14. Question Result, ID, References **NA, AR.EC.ECDAPLANMOC.R, 195.589(c) (195.588(b)(4)(iii), 195.452(l)(1)(ii), 195.452(f)(4))**
 Question Text *Do the records indicate that changes in the ECDA plan have been implemented and documented?*
 Assets Covered **88980 (72)**
 Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

 No such event occurred, or condition existed, in the scope of inspection review.
15. Question Result, ID, References **NA, AR.EC.ECDAPOSTASSESS.R, 195.589(c) (195.588(b)(5), 195.452(l)(1)(ii), 195.452(f)(4))**
 Question Text *Do the records indicate that the requirements for post assessment were implemented?*
 Assets Covered **88980 (72)**
 Result Notes **McChord Pipeline Company does not use ECDA as an integrity management evaluation method. They use ILI.**

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

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

16. Question Result, ID, References **NA, AR.SCC.SCCDAALL.O, 195.588(c) (195.505)**
 Question Text *From field observations, was SCCDA performed in accordance with the SCCDA plan?*
 Assets Covered **88980 (72)**
 Result Notes **No such activity/condition was observed during the inspection. However, Dye-Pen is used on exposed pipe to check for SCC**

AR.IA: Integrity Assessments

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

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

Assets Covered 88980 (72)

Result Notes This is contained Section 5.3. ILI and pressure testing are methods used.

18. Question Result, ID, Sat, AR.IA.METHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, References 195.588)
Question Text *Do the records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats?*
Assets Covered 88980 (72)
Result Notes The assessment method of ILI using MFL is appropriate.
19. Question Result, ID, Sat, AR.IA.ASESSESSCHEDULE.P, 195.452(f)(5) (195.452(j)(3), 195.452(j)(5), 195.452(e), 195.452(g), References 195.591)
Question Text *Does the process for assessment include a prioritized schedule in accordance with 195.452 (j) that is based on all the risk factors required by 195.452(e)?*
Assets Covered 88980 (72)
Result Notes Section 8.1 has the schedule NTE 5 years. Newly identified pipeline segments are not added to MPLS system.
20. Question Result, ID, Sat, AR.IA.ASESSESSCHEDULE.R, 195.452(l)(1)(ii) (195.452(b)(5), 195.452(c), 195.452(d), References 195.452(f)(5), 195.452(j)(3), 195.452(j)(5), 195.591)
Question Text *Do the records indicate that assessments are implemented as specified in the assessment plan?*
Assets Covered 88980 (72)
Result Notes Assessments were performed on 12-15-2004, 08-19-2009, 10-30-2014, and 6-20-2019.
21. Question Result, ID, Sat, AR.IA.REVIEWQUAL.P, 195.452(f)(8) (195.452(g), 195.452(h)(2)) References
Question Text *Does the process specify qualification requirements for personnel who review and evaluate integrity assessment results and information analysis?*
Assets Covered 88980 (72)
Result Notes IMP Section 6.3
22. Question Result, ID, Sat, AR.IA.REVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g), 195.452(h)(2)) References
Question Text *Do the records indicate that personnel who review and evaluate integrity assessment results and information analysis are qualified?*
Assets Covered 88980 (72)
Result Notes Onstream was the ILI vendor. Qualifications for personnel who review and evaluate results are as follows: Shane Gaeslin valid until 2021, Huong Lee valid until 2022, and Roni Sierra Level III supervisor qualifications expire on April 1, 2022. (Axial MFL, Geometry, XYZ)
23. Question Result, ID, Sat, AR.IA.STANDARDS.P, 195.452(f)(5) (195.452(b)(6)) References
Question Text *Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing integrity assessments?*
Assets Covered 88980 (72)
Result Notes Section 5.3.2 (ILI) and 5.3.1 (PSI testing) are industry standard.
24. Question Result, ID, Sat, AR.IA.STANDARDS.R, 195.452(l)(1)(ii) (195.452(b)(6)) References
Question Text *Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments?*
Assets Covered 88980 (72)
Result Notes We reviewed the 2019 ILI performed by Onstream. Additionally, Metalogic performed a LIDAR scan on an anomaly.

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

25. Question Result, ID, Sat, AR.II.ILIIIMPLPERQUAL.P, 195.452(f)(5) (195.591) References
Question Text *Does the process identify the qualification requirements for personnel who perform ILI (In Line Inspections)?*

Assets Covered 88980 (72)
Result Notes Section 6.3 contains this.

26. Question Result, ID, References Sat, AR.IL.ILIIMPLPERQUAL.R, 195.591 (195.452(l)(1)(ii), 195.452(f)(5))
Question Text *Do the records indicate that personnel who perform ILI (In Line Inspections) are qualified and certified (where applicable)?*
Assets Covered 88980 (72)
Result Notes MPL performs speed control and loads the pig. The technician was Chris Jessen, ILI field Tech 1, his expiration was November 2, 2019.
27. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 195.452(f)(8) (195.452(g))
Question Text *Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis?*
Assets Covered 88980 (72)
Result Notes Section 6.3
28. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g))
Question Text *Do the records indicate that personnel who review and evaluate ILI integrity assessment results and information analysis are qualified?*
Assets Covered 88980 (72)
Result Notes Please see previous question. Already covered in question 22.
29. Question Result, ID, References Sat, AR.IL.ILISPECS.P, 195.452(f)(5) (195.452(h), 195.452(j), 195.591)
Question Text *Does the process include adequate ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization?*
Assets Covered 88980 (72)
Result Notes Section 6.3
30. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.P, 195.452(f)(4) (195.452(j)(5)(i), 195.452(h), 195.591)
Question Text *Does the process include the validation of ILI results?*
Assets Covered 88980 (72)
Result Notes IMP Section 6.5 (Validation)
31. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.R, 195.452(l)(1)(ii) (195.452(j)(5)(i), 195.452(f)(4), 195.452(h), 195.452(c)(1), 195.591)
Question Text *Do the records for validating ILI assessment results indicate that the process was implemented?*
Assets Covered 88980 (72)
Result Notes Metalogic scanned the anomaly.
32. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.452(h))
Question Text *Does the process for evaluating ILI results include integration of all available information about the integrity of the pipeline?*
Assets Covered 88980 (72)
Result Notes Section 6.5 contains this. Digs, field inspection reports, CIS data, run to run comparisons, and other information.
33. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(h))
Question Text *Do the records indicate that the operator integrated other data/information when evaluating ILI tool data/results?*
Assets Covered 88980 (72)
Result Notes MPL took the ILI data and compared it with other data they had about the anomaly, such as the laser scan.
34. Question Result, ID, References NA, AR.IL.ILIIMPLEMENT.O, 195.452(b)(5)

Question Text *Have the ILI procedures been followed?*
Assets Covered 88980 (72)
Result Notes No such activity/condition was observed during the inspection.

AR.PTI: Integrity Assessment Via Pressure Test

35. Question Result, ID, References NA, AR.PTI.PRESSTESTACCEP.P, 195.452(f)(5) (195.304, 195.305, 195.306, 195.308, 195.452(j)(5)(ii))
Question Text *Does the process define acceptance criteria for a successful pressure test?*
Assets Covered 88980 (72)
Result Notes Section 5.3.1 says pressure testing only required every 76 years. 1996 the line was pressure tested.
36. Question Result, ID, References NA, AR.PTI.PRESSTESTCORR.P, 195.452(f)(3) (195.452(g)(3))
Question Text *Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?*
Assets Covered 88980 (72)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
37. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.O, 195.452(b)(5) (195.452(c)(1)(i)(b), 195.452(j)(5)(ii), 195.304)
Question Text *Was the pressure test conducted in accordance with the procedures?*
Assets Covered 88980 (72)
Result Notes No such activity/condition was observed during the inspection.
38. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.R, 195.310 (195.452(f)(2), 195.452(f)(5), 195.452(c), 195.452(l)(1)(ii))
Question Text *Do the pressure test records indicate compliance with Part 195, Subpart E?*
Assets Covered 88980 (72)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
39. Question Result, ID, References NA, AR.PTI.PRESSTESTCORR.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g)(3))
Question Text *When pressure testing was used as the integrity assessment method, do the records indicate that the effectiveness of the corrosion control program was documented?*
Assets Covered 88980 (72)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.OT: Other Technology

40. Question Result, ID, References NA, AR.OT.OTPLAN.P, 195.452(f)(5) (195.452(c)(1)(i)(D), 195.452(j)(5)(iv))
Question Text *If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe?*
Assets Covered 88980 (72)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
41. Question Result, ID, References NA, AR.OT.OTPLAN.R, 195.452(l)(1)(ii) (195.452(j)(5)(iv), 195.452(f)(5), 195.452(c)(1)(i)(D))
Question Text *Do the records indicate that the Other Technology integrity assessments were performed in accordance with procedures and vendor recommendations?*
Assets Covered 88980 (72)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
42. Question Result, ID, References NA, AR.OT.OTPLAN.O, 195.452(b)(5)
Question Text *Has the process for the use of "Other Technology" been followed?*
Assets Covered 88980 (72)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

43. Question Result, ID, References **NA, AR.OT.ASSESSMENTREVIEW.P, 195.452(f)(8) (195.452(j)(5))**
 Question Text *Does the process specify qualification requirements for personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
44. Question Result, ID, References **NA, AR.OT.ASSESSMENTREVIEW.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(j)(5))**
 Question Text *Do the records pertaining to the selected integrity assessments indicate that personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology are qualified?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.RCHCA: Repair Criteria (HCA)

45. Question Result, ID, References **Sat, AR.RCHCA.DISCOVERY.P, 195.452(f)(4) (195.452(h)(2))**
 Question Text *Does the integrity assessment process define "discovery of condition" and the required time frame for anomalies in a pipeline segment that can affect an HCA?*
 Assets Covered **88980 (72)**
 Result Notes **Section 6.3 Immediate is 5 days from discovery. Then 180 days and monitored. The last run took 30 days to receive the final report. The initial report had no immediate repair conditions.**
46. Question Result, ID, References **Sat, AR.RCHCA.IMSCHEDULE.P, 195.452(f)(4) (195.452(h)(3), 195.452(h)(4))**
 Question Text *Does the process include developing a prioritized schedule for evaluating and remediating all identified repair conditions consistent with the repair criteria and within the time frames found in 195.452(h)(4)?*
 Assets Covered **88980 (72)**
 Result Notes **Section 6.4 (Discovery of condition priority)**
47. Question Result, ID, References **Sat, AR.RCHCA.DISCOVERY.R, 195.452(l)(1)(ii) (195.452(h)(2), 195.452(f)(4))**
 Question Text *Do the records indicate that "discovery of condition" results for all anomalies occurred promptly, but no later than 180 days after the completion of the integrity assessment?*
 Assets Covered **88980 (72)**
 Result Notes **The repair was completed 9/25-10/1/2019. The vendor's final report was 7/19/2019.**
48. Question Result, ID, References **Sat, AR.RCHCA.IMPRC.P, 195.452(f)(4) (195.452(h)(1), 195.452(h)(4))**
 Question Text *Does the process include criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?*
 Assets Covered **88980 (72)**
 Result Notes **This is discussed in Section 7. 7.3 has the remedial action process.**
49. Question Result, ID, References **Sat, AR.RCHCA.REMEDIATION.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4), 195.452(b)(5), 195.569)**
 Question Text *Do records indicate that anomaly remediation and documentation of remediation was performed in accordance with the process?*
 Assets Covered **88980 (72)**
 Result Notes **We reviewed the FIR (Field Investigation Report) for 9-25 to 10-1-2019.**
50. Question Result, ID, References **Sat, AR.RCHCA.IMPRC.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(1), 195.452(h)(4))**
 Question Text *Do records indicate that prompt action was taken to address all anomalous conditions discovered through the integrity assessment or information analysis?*
 Assets Covered **88980 (72)**
 Result Notes **The operator met the 180 day requirement.**
51. Question Result, ID, References **NA, AR.RCHCA.REMEDIATION.O, 195.452(b)(5) (195.402(a), 195.402(c)(14), 195.422(a), 195.569, 195.589(c))**

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

Assets Covered 88980 (72)

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

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

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

Assets Covered 88980 (72)

Result Notes Section 7.3

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

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

Assets Covered 88980 (72)

Result Notes Section 7.4.1

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

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

Assets Covered 88980 (72)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. They didn't take one in 2009 either.

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

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

Assets Covered 88980 (72)

Result Notes They met the 180 day requirement.

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

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

Assets Covered 88980 (72)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. They do perform NDE (Dye-Pen) if they remove the coating. They have personnel that do Dye-Pen on site if needed.

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

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

Assets Covered 88980 (72)

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

AR.RMP: Repair Methods and Practices

58. Question Result, ID, References Sat, AR.RMP.SAFETY.P, 195.402(c)(14) (195.422(a), 195.452(h)(1))

Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*

Assets Covered 88980 (72)

Result Notes This is in the first portion of the O&M manual. Maintenance manual E1 8 contains this information.

59. Question Result, ID, References NA, AR.RMP.SAFETY.O, 195.422(a) (195.402(c)(14), 195.452(h)(1))

Question Text *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?*

Assets Covered 88980 (72)

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

60. Question Result, ID, References Sat, AR.RMP.METHOD.P, 195.402(c)(3) (195.452(h)(1), 195.585)
Question Text *Does the process identify permissible repair methods for each type of defect?*
Assets Covered 88980 (72)
Result Notes Maintenance manual E1 Section 6 contains this information
61. Question Result, ID, References Sat, AR.RMP.METHOD.R, 195.404(c)(1) (195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1), 195.401(b)(2))
Question Text *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?*
Assets Covered 88980 (72)
Result Notes Repairs for this inspection time period were performed using 3 Clocksprings. OQ records were reviewed for the installers.
62. Question Result, ID, References Sat, AR.RMP.REPAIRQUAL.R, 195.505(b) (195.507(a), 195.505(c), 195.452(h)(1), 195.452(b)(5))
Question Text *From the records review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?*
Assets Covered 88980 (72)
Result Notes I checked OQ records for all three of the installers.
63. Question Result, ID, References Sat, AR.RMP.PIPECONDITION.R, 195.404(c)(1) (195.404(c)(2), 195.452(l)(1)(ii))
Question Text *Do the repair records document all the information needed to understand the conditions of the pipe and its environment and also provide the information needed to support the Integrity Management program, when applicable?*
Assets Covered 88980 (72)
Result Notes This was on the FIR. It was reviewed.
64. Question Result, ID, References NA, AR.RMP.REPLACESTD.R, 195.404(a)(1) (195.422(b),)
Question Text *Were all replaced line pipe and/or components designed and constructed as required by Part 195?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
65. Question Result, ID, References NA, AR.RMP.PIPEMOVE.R, 195.424(a) (195.424(b), 195.424(c))
Question Text *From a review of selected records, were pipeline movements performed in accordance with 195.424?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
66. Question Result, ID, References NA, AR.RMP.WELDERQUAL.R, 195.214(a) (195.214(b), 195.222(a), 195.222(b),)
Question Text *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
67. Question Result, ID, References NA, AR.RMP.WELDQUAL.R, 195.226(a) (195.226(b), 195.226(c), 195.230(a), 195.230(b), 195.230(c),)
Question Text *From the review of the results of integrity assessment and remediation projects, were defects on new welds repaired in accordance with 195.226 or 195.230?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
68. Question Result, ID, References NA, AR.RMP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234(a), 195.234(b), 195.234(c), 195.234(d), 195.234(e),)
Question Text *From the review of the results of remediation projects, were new welds inspected and examined in accordance with 195.228 or 195.234?*
Assets Covered 88980 (72)

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

69. Question Result, ID, References Sat, AR.RMP.CRACKNDE.P, 195.452(f)(4) (195.452(h))

Question Text *Does the process include appropriate NDE method(s) and other information gathering during the evaluation of cracks and cracking?*

Assets Covered 88980 (72)

Result Notes Section 8.4 in the IMP Manual

70. Question Result, ID, References Sat, AR.RMP.CRACKNDE.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h), 195.404(c))

Question Text *Do the records indicate that appropriate NDE method(s) were used and other information was gathered related to the evaluation of cracking?*

Assets Covered 88980 (72)

Result Notes Images of dye-pen for the 99th and Aquaduct 180 day job were reviewed.

TDC.IMFACIL: Integrity Management for Facilities (Re-Presented)

71. Question Result, ID, References NA, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

72. Question Result, ID, References NA, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(3)) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

73. Question Result, ID, References NA, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

74. Question Result, ID, References NA, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

75. Question Result, ID, References NA, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

76. Question Result, ID, References NA, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

77. Question Result, ID, References NA, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

78. Question Result, ID, References NA, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

79. Question Result, ID, References NA, IM.FACIL.PMMMITIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

80. Question Result, ID, References NA, IM.FACIL.PMMMITIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

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

Assets Covered 88980 (72)

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

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

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

Assets Covered 88980 (72)

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

IM.HC: High Consequence Areas

82. Question Result, ID, References Sat, IM.HC.HCALLOCATION.P, 195.452(f)(1) (195.452(a), 195.452(d)(3), 195.452(b)(2))

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

Assets Covered 88980 (72)

Result Notes IMP Section 5.1 and 5.2.

The entire line is an HCA. The initial assessment was done and an annual review is also completed to look for changes to HCAs, new schools, .etc

83. Question Result, ID, References Sat, IM.HC.HCALLOCATION.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a), 195.452(b)(2), 195.452(d)(3), 195.452(j)(1))

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

Assets Covered 88980 (72)

Result Notes Pipe segment location is updated and this is in a PM. (#2236)

84. Question Result, ID, References NA, IM.HC.HCALLOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1))

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

Assets Covered 88980 (72)

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

85. Question Result, ID, References **Sat, IM.HC.HCAIDENT.P, 195.452(f)(1) (195.452(a))**
 Question Text *Does the process include all locations where pipeline segments directly intersect a high consequence area?*
 Assets Covered **88980 (72)**
 Result Notes **The oil spill response plan contains information about specific locations in Section 3.7.**
86. Question Result, ID, References **Sat, IM.HC.HCAIDENT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))**
 Question Text *Do records indicate that all locations where a pipeline segment is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate technical justification is provided?*
 Assets Covered **88980 (72)**
 Result Notes **Records of segments identified, including what type of HCA could be impacted, were reviewed.**
87. Question Result, ID, References **Sat, IM.HC.HCARELEASE.P, 195.452(f)(1) (195.452(a))**
 Question Text *Does the process include methods to determine the locations and volume of potential commodity releases?*
 Assets Covered **88980 (72)**
 Result Notes **Section 3.7.3 in the Spill Response Manual. (Oil recovery planning standards)**
88. Question Result, ID, References **Sat, IM.HC.HCARELEASE.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))**
 Question Text *Do records indicate that identified release locations and spill volumes are consistent with the documented process?*
 Assets Covered **88980 (72)**
 Result Notes **The Sefnco leak in 2017 was 180 barrels. This was much less than the 1943 bbls worst case scenario. MPL had shutdown in 6 min.**
89. Question Result, ID, References **Sat, IM.HC.HCAOVERLAND.P, 195.452(f)(1) (195.452(a))**
 Question Text *Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*
 Assets Covered **88980 (72)**
 Result Notes **Section 3.7.4 of the Spill Response Plan.**
90. Question Result, ID, References **Sat, IM.HC.HCAOVERLAND.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))**
 Question Text *Do records indicate that the analysis of overland spread is consistent with the documented process?*
 Assets Covered **88980 (72)**
 Result Notes **The only spill in recent history was localized spill 2017 and was rapidly contained.**
91. Question Result, ID, References **Sat, IM.HC.HCAH2OTRANSP.P, 195.452(f)(1) (195.452(a))**
 Question Text *Does the process include the analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*
 Assets Covered **88980 (72)**
 Result Notes **Section 3.7 of the Spill Response Plan. Appendix A of the IMP Plan.**
92. Question Result, ID, References **NA, IM.HC.HCAH2OTRANSP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))**
 Question Text *Do records indicate that water transport analysis is consistent with the documented process?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
93. Question Result, ID, References **NA, IM.HC.HCAAIRDISP.P, 195.452(f)(1) (195.452(a))**
 Question Text *Does the process include the analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

94. Question Result, ID, References **NA, IM.HC.HCAAIRDISP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))**
 Question Text *Do the records indicate that the analysis of air dispersion of vapors is consistent with the documented process?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
95. Question Result, ID, References **NA, IM.HC.HCAINDIRECT.P, 195.452(f)(1) (195.452(a))**
 Question Text *Does the process include all locations of pipeline segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. The entire line is in an HCA.**
96. Question Result, ID, References **Sat, IM.HC.HCAINDIRECT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))**
 Question Text *Do the records indicate that endpoints of pipeline segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?*
 Assets Covered **88980 (72)**
 Result Notes **Appendix A HCA Chart 5 contains detailed buffer information.**
97. Question Result, ID, References **NA, IM.HC.HCACAT3.P, 195.452(f)(1) (195.452(b)(2))**
 Question Text *Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?*
 Assets Covered **88980 (72)**
 Result Notes **MPL is a Category 2 pipeline. No such relevant facilities/equipment existed in the scope of inspection review.**
98. Question Result, ID, References **NA, IM.HC.HCACAT3.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(b)(2))**
 Question Text *Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?*
 Assets Covered **88980 (72)**
 Result Notes **MPL is a Category 2 pipeline. No such relevant facilities/equipment existed in the scope of inspection review.**

IM.RA: Risk Analysis

99. Question Result, ID, References **NA, IM.RA.RADATA.O, 195.452(b)(5) (195.452(f)(3))**
 Question Text *Are field conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*
 Assets Covered **88980 (72)**
 Result Notes **No such activity/condition was observed during the inspection.**
100. Question Result, ID, References **Sat, IM.RA.RADATA.P, 195.452(f)(3) (195.452(g), 195.452(j))**
 Question Text *Does the process include an analysis and integration of all available information about the integrity of the entire pipeline and the consequences of a failure?*
 Assets Covered **88980 (72)**
 Result Notes **IMP Appendix B contains segment risk factors.**
101. Question Result, ID, References **Sat, IM.RA.RADATA.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))**
 Question Text *Do the records indicate that all available information has been integrated into the risk analysis?*
 Assets Covered **88980 (72)**
 Result Notes **Records reviewed showed that the best available information is in the risk analysis.**

102. Question Result, ID, References **Sat, IM.RA.RAMETHOD.P, 195.452(f)(3) (195.452(g), 195.452(j))**
 Question Text *Does the process include methodology for evaluating risk to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?*
 Assets Covered **88980 (72)**
 Result Notes **IMP Appendix B**
103. Question Result, ID, References **Sat, IM.RA.RARERESULTS.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))**
 Question Text *Do the records indicate that the results of the risk analysis process are useful for drawing conclusions and insights for decision making?*
 Assets Covered **88980 (72)**
 Result Notes **Section 9.1 and Appendix B. The risk analysis was validated by the 2017 spill.**
104. Question Result, ID, References **Sat, IM.RA.RASEGMENT.P, 195.452(f)(3) (195.452(g), 195.452(j))**
 Question Text *Does the risk analysis process consider and incorporate the variation in risk factors along the pipeline such that segment-specific risk results and insights are obtained?*
 Assets Covered **88980 (72)**
 Result Notes **IMP Appendix B-7**
105. Question Result, ID, References **Sat, IM.RA.RAMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(e))**
 Question Text *Do the records indicate the evaluation of the methodology(ies) used for evaluating risks to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?*
 Assets Covered **88980 (72)**
 Result Notes **Section 9 of the IMP has risk factors. i.e. Section 9.1 for Third Party Damage**

IM.CA: Continual Evaluation and Assessment

106. Question Result, ID, References **Sat, IM.CA.ASSESSINTERVAL.P, 195.452(f)(5) (195.452(e), 195.452(g), 195.452(j)(3))**
 Question Text *Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval?*
 Assets Covered **88980 (72)**
 Result Notes **Risk factors are in Section 9**
107. Question Result, ID, References **Sat, IM.CA.ASSESSINTERVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(3), 195.452(g))**
 Question Text *Do the records indicate that the assessment intervals are consistent with the risks identified for the pipe segment and the results of previous assessments?*
 Assets Covered **88980 (72)**
 Result Notes **Records were reviewed to check the assessment interval. IMP Section 8.1 discusses the interval.**
108. Question Result, ID, References **Sat, IM.CA.ASSESSMETHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)**
 Question Text *Does the process specify assessment methods that are appropriate for the specific integrity threats to the pipe segment?*
 Assets Covered **88980 (72)**
 Result Notes **Section 5.3.1 and 5.3.2 as well as the seam study report by Kiefner substantiates the use of a standard MFL tool.**
109. Question Result, ID, References **Sat, IM.CA.ASSESSMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)**
 Question Text *Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment?*
 Assets Covered **88980 (72)**
 Result Notes **The Keifner report addressed by concerns about not using a TFL instead of an MFL ILI tool.**
110. Question Result, ID, References **Sat, IM.CA.ASSESSNOTIFY.P, 195.452(f)(5) (195.452(j)(4), 195.452(m))**

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

Assets Covered 88980 (72)

Result Notes IMP Section 13 Table 1

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

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

Assets Covered 88980 (72)

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

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

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

Assets Covered 88980 (72)

Result Notes IMP Section 10 (Measuring Program Effectiveness) and there is a PM. Measure are in Section 10.1

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

Question Text *Do records indicate that periodic evaluations of pipeline integrity are being performed and are on a technically justified frequency?*

Assets Covered 88980 (72)

Result Notes Records reviewed 2018 Appendix D-1 completed 2019. The 2018 review of 2017 data had information on Sefnco digging without locates or MPL present.

IM.PM: Preventive and Mitigative Measures

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

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

Assets Covered 88980 (72)

Result Notes Section 9 contains this. EFRDS in 9.3

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

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

Assets Covered 88980 (72)

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

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

Assets Covered 88980 (72)

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

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

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

Assets Covered 88980 (72)

Result Notes Reviewed ROW inspections, 100% positive response to locate requests, ROW marker addition, weekly patrols, and increased rectifier operation checks. After the 2014 inspection, AC interference was mitigated by MPL putting the HV powerlines onto their map and storm sewer locations.

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

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

Assets Covered 88980 (72)

Result Notes Section 9.6 discusses corrosion inhibitors. The operator drives the line daily to perform locates and markers are checked.

119. Question Result, ID, [Sat, IM.PM.PMMRISKANALYSIS.P, 195.452\(f\)\(6\) \(195.452\(i\)\(1\), 195.452\(i\)\(2\), 195 Appendix C, Section II, API Standard 1160\)](#)
 Question Text *Does the Integrity Management Program include conducting a risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection?*
 Assets Covered [88980 \(72\)](#)
 Result Notes [Section 5.1 contains this. Section 5.2 states that is was done in 2005 and 2010 and any new HCAs will be incorporated.](#)
120. Question Result, ID, [Sat, IM.PM.PMMRISKANALYSIS.R, 195.452\(l\)\(1\)\(ii\) \(195.452\(f\)\(6\), 195.452\(i\)\(1\), 195.452\(i\)\(2\), 195 Appendix C, Section VI, API Standard 1160\)](#)
 Question Text *Do records demonstrate that an adequate risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection was performed?*
 Assets Covered [88980 \(72\)](#)
 Result Notes [Section 5.1 contains this. Section 5.2 states that is was done in 2005 and 2010 and any new HCAs will be incorporated. Appendix B contains the actual risk analysis.](#)
121. Question Result, ID, [Sat, IM.PM.IMLEAKDETEVAL.P, 195.452\(f\)\(6\) \(195.452\(i\)\(3\), 195 Appendix C, Section III, API Standard 1160\)](#)
 Question Text *Does the Integrity Management Program include a process for the evaluation of leak detection capabilities and modifying, as necessary, to protect the high consequence areas?*
 Assets Covered [88980 \(72\)](#)
 Result Notes [Section 9.2 contains the CPM system detail.](#)
122. Question Result, ID, [Sat, IM.PM.IMLEAKDETEVAL.R, 195.452\(l\)\(1\)\(ii\) \(195.452\(f\)\(6\), 195.452\(i\)\(3\), 195 Appendix C, Section VI, API Standard 1160\)](#)
 Question Text *Do records indicate that all required and other relevant leak detection evaluation factors have been evaluated to ensure the protection of HCAs?*
 Assets Covered [88980 \(72\)](#)
 Result Notes [Per MPL Manual. Spill response personnel are local \(including on site personnel\) An evaluation of the leak detection system was performed after the 2017 TPD incident and it performed appropriately. During the August 2nd, 2017 incident, leak detection alarms worked exactly as intended, and Controller \(Board Operator\) response was timely and appropriate. The first alarm occurred approximately 30 seconds after the puncture, and the pipeline was shut down in 6 minutes.](#)
123. Question Result, ID, [Sat, IM.PM.PMMEFRD.P, 195.452\(f\)\(6\) \(195.452\(i\)\(4\), 195.452\(i\)\(1\), 195.452\(i\)\(2\), API Standard 1160\)](#)
 Question Text *Does the Integrity Management Program include a preventive & mitigative (P&M) measures process that specifically addresses the identification, evaluation, and application of EFRDs to protect high consequence areas in the event of a hazardous liquid pipeline release?*
 Assets Covered [88980 \(72\)](#)
 Result Notes [This is in Section 9.3 \(EFRDs\) MPL does use a check valve as an EFRD](#)
124. Question Result, ID, [Sat, IM.PM.PMMEFRD.R, 195.452\(l\)\(1\)\(ii\) \(195.452\(f\)\(6\), 195.452\(i\)\(4\), 195 Appendix C, Section VI, API Standard 1160\)](#)
 Question Text *Do the records demonstrate that all required and other relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?*
 Assets Covered [88980 \(72\)](#)
 Result Notes [This study is attached as Appendix C \(C-1\) of MPL's IMP program.](#)

IM.FACIL: Facilities

125. Question Result, ID, [NA, IM.FACIL.FACILIDENT.P, 195.452\(f\)\(1\) \(also presented in: TDC.IMFACIL\)](#)
 Question Text *Does the program include a written process for identification of facilities that could affect an HCA?*
 Assets Covered [88980 \(72\)](#)
 Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)
126. Question Result, ID, [NA, IM.FACIL.FACILIDENT.R, 195.452\(l\)\(1\)\(i\) \(195.452\(b\)\(2\), 195.452\(d\)\(3\)\) \(also presented in: TDC.IMFACIL\)](#)
 Question Text *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*
 Assets Covered [88980 \(72\)](#)

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

127. Question Result, ID, References NA, IM.FACIL.RISKANAL.P, 195.452(f)(3) (195.452(g), 195.452(j))
Question Text *Does the process include approaches to identify and evaluate the risks of facilities that can affect HCAs?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
128. Question Result, ID, References NA, IM.FACIL.RISKANAL.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))
Question Text *Do the records indicate that the analysis of risk of facilities has been performed as required?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
129. Question Result, ID, References NA, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)
Question Text *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
130. Question Result, ID, References NA, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)
Question Text *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
131. Question Result, ID, References NA, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: TDC.IMFACIL)
Question Text *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
132. Question Result, ID, References NA, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: TDC.IMFACIL)
Question Text *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
133. Question Result, ID, References NA, IM.FACIL.AIRDISP.P, 195.452(f)(1) (195.452(l)(1)(i))
Question Text *Where the facility handles HVLs or Volatile Liquids, does the process include an analysis of the air dispersion of vapors released from the facility to determine effects on HCAs?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
134. Question Result, ID, References NA, IM.FACIL.AIRDISP.R, 195.452(l)(1)(ii)
Question Text *Where the facility handles HVLs or Volatile Liquids, do the records indicate that the analysis of air dispersion of vapors from the facility is consistent with the process requirements?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
135. Question Result, ID, References NA, IM.FACIL.PERIODEVAL.P, 195.452(f)(5) (195.452(g), 195.452(j)(1), 195.452(j)(2))
Question Text *Does the process include requirements for performing continual evaluations of facility integrity?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

136. Question Result, ID, References **NA, IM.FACIL.PERIODEVAL.R, 195.452(l)(1)(ii) (195.452(j)(2))**
 Question Text *Do the records indicate that periodic evaluations of integrity at facilities affecting HCAs have been performed?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
137. Question Result, ID, References **NA, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i))** (also presented in: TDC.IMFACIL)
 Question Text *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
138. Question Result, ID, References **NA, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1))** (also presented in: TDC.IMFACIL)
 Question Text *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
139. Question Result, ID, References **NA, IM.FACIL.PMMMIGATIVE.P, 195.452(f)(6) (195.452(i))** (also presented in: TDC.IMFACIL)
 Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
140. Question Result, ID, References **NA, IM.FACIL.PMMMIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1))** (also presented in: TDC.IMFACIL)
 Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
141. Question Result, ID, References **NA, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1)** (also presented in: TDC.IMFACIL)
 Question Text *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

IM.QA: Quality Assurance

142. Question Result, ID, References **Sat, IM.QA.IMPERFEFFECTIVE.P, 195.452(f)(7) (195.452(k))**
 Question Text *Does the process for evaluating IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*
 Assets Covered **88980 (72)**
 Result Notes **There is a PM to do an annual review. Appendix D.**
143. Question Result, ID, References **Sat, IM.QA.IMPERFEFFECTIVE.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))**
 Question Text *Do the records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*
 Assets Covered **88980 (72)**
 Result Notes **Reviewed two years of evaluations. (2018 and 2017 were reviewed)**
144. Question Result, ID, References **Sat, IM.QA.RECORDS.P, 195.402(c)(3) (195.452(l)(1))**

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

Assets Covered 88980 (72)

Result Notes Section 8.3 states records will be kept for the life of the pipeline.

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

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

Assets Covered 88980 (72)

Result Notes Appendix D contains a quantifiable review. This is done every year.

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

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

Assets Covered 88980 (72)

Result Notes The records reviewed contain performance measures about operational status and KPIs from the previous two years.

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

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

Assets Covered 88980 (72)

Result Notes A log sheet is used.

MO.LS: Low-Stress Rural Pipelines

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

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

Assets Covered 88980 (72)

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

149. Question Result, ID, References NA, MO.LS.ECONBURDEN.R, 195.12(f)(2) (195.12(b), 195.12(m))

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

Assets Covered 88980 (72)

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

RPT.NR: Notices and Reporting

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

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

Assets Covered 88980 (72)

Result Notes Section 13, 7.4.1 (psi reduction)

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

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

Assets Covered 88980 (72)

Result Notes This has not occurred. No such event occurred, or condition existed, in the scope of inspection review.

RPT.RR: Regulatory Reporting (Traditional)

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

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

Assets Covered 88980 (72)

Result Notes I reviewed the previous two years ARs. There were no issues noted.

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

Question Text *Is Annual Report Part G data complete and accurate?*

Assets Covered 88980 (72)

Result Notes Part G of the Annual Report was reviewed.

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.