

Inspection Output (IOR)

Generated on 2020.January.22 10:12

Inspection Information

Inspection Name	Solvay Records Review and Field Verification	Operator(s)	SOLVAY CHEMICALS, INC. (32399)	Plan Submitted	01/03/2020
		Lead	David Cullom	Plan Approval	01/03/2020 by Joe Subits
Status	PLANNED	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity Start	01/08/2020
Start Year	2020	Supervisor	Joe Subits	All Activity End	01/09/2020
System Type	GT	Director	Sean Mayo	Inspection Submitted	--
Protocol Set ID	GT.2020.01			Inspection Approval	--

Inspection Summary

No probable violations or areas of concern were found during this inspection. In 2020, Solvay's status was changed from distribution to transmission.

Solvay Chemicals operates a 6" hydrogen pipeline for approximately 481 feet across State Highway 432 in Longview, WA. The line is not odorized and is leak surveyed monthly. We were able to perform interrupted cathodic protection testing to obtain IR free readings during this inspection.

Other inspections scheduled for Solvay in 2020 are:

An O&M plan and procedure review (transmission) technical assistance inspection.

A Drug and Alcohol Program inspection.

An Operator Qualification inspection.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88967 (1,832)	Solvay Chemicals, Inc.	unit	88967	Compressor Stations Storage Fields Service Line Bottle/Pipe - Holders Vault Onshore Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned	127	127	127	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.	88967 (1,832)	n/a	TQ.PROT9	P, R, O, S	Detail
2.	88967 (1,832)	n/a	MO.GO	R, O	Detail
3.	88967 (1,832)	n/a	MO.GM	R, O	Detail
4.	88967 (1,832)	n/a	MO.RW	R, O	Detail
5.	88967 (1,832)	n/a	PD	R, O	Detail
6.	88967 (1,832)	n/a	MO.GOABNORMAL	R	Detail
7.	88967 (1,832)	n/a	MO.GOCLASS.CLASSLOCATEREV.O	P, R, O, S	Detail
8.	88967 (1,832)	n/a	MO.GOCLASS.CLASSLOCATESTUDY.P	--	Detail
9.	88967 (1,832)	n/a	MO.GOCLASS.CLASSLOCATESTUDY.R	P, R, O, S	Detail
10.	88967 (1,832)	n/a	TD.CPMONITOR	R, O	Detail
11.	88967 (1,832)	n/a	TD.ATM	R, O	Detail
12.	88967 (1,832)	n/a	TD.CPMONITOR.TESTSTATION.P	--	Detail
13.	88967 (1,832)	n/a	TD.CPMONITOR.TESTSTATION.P	--	Detail
14.	88967 (1,832)	n/a	TD.CPMONITOR.TESTSTATION.R	P, R, O, S	Detail
15.	88967 (1,832)	n/a	TD.CPMONITOR.TESTSTATION.O	P, R, O, S	Detail
16.	88967 (1,832)	n/a	TD.CP	R, O	Detail
17.	88967 (1,832)	n/a	TD.COAT	R, O	Detail
18.	88967 (1,832)	n/a	TD.ICP.EXAMINE.R	P, R, O, S	Detail
19.	88967 (1,832)	n/a	TD.ICP.EXAMINE.O	P, R, O, S	Detail
20.	88967 (1,832)	n/a	TD.ICP.EVALUATE.P	--	Detail
21.	88967 (1,832)	n/a	TD.ICP.EVALUATE.R	P, R, O, S	Detail
22.	88967 (1,832)	n/a	TD.ICP.REPAIR.P	--	Detail
23.	88967 (1,832)	n/a	TD.ICP.REPAIR.R	P, R, O, S	Detail
24.	88967 (1,832)	n/a	TD.CP.UNPROTECT.P	--	Detail
25.	88967 (1,832)	n/a	TD.CP.AMPHOTERIC.R	P, R, O, S	Detail
26.	88967 (1,832)	n/a	TD.CP.AMPHOTERIC.P	--	Detail
27.	88967 (1,832)	n/a	FS.FG	R, O	Detail
28.	88967 (1,832)	n/a	FS.VA	R, O	Detail
29.	88967 (1,832)	n/a	FS.VA.CMPVLVTEST.R	P, R, O, S	Detail
30.	88967 (1,832)	n/a	FS.VA.CMPVLVMAINT.O	P, R, O, S	Detail
31.	88967 (1,832)	Core, Baseline Records (Form 1), Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail
32.	88967 (1,832)	n/a	RPT.NR	P, R, O, S	Detail

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directive s	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Records and Field Review	--	01/08/2020	01/09/2020	n/a	all planned questions	all assets	all types	127	127	127	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, 127 results)

145 (instead of 127) results are listed due to re-presentation of questions in more than one sub-group.

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

1. Question Result, ID, References **NA, AR.IL.ILIVALIDATE.R, 192.947(g) (192.921(a)(1))**
Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*
Assets Covered **88967 (1,832)**
Result Notes **No HCAs on Solvay's system. No such relevant facilities/equipment existed in the scope of inspection review.**

AR.PTI: Integrity Assessment Via Pressure Test

2. Question Result, ID, References **NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))**
Question Text *Do the test records validate the pressure test?*
Assets Covered **88967 (1,832)**
Result Notes **No HCAs on Solvay's system. No such relevant facilities/equipment existed in the scope of inspection review.**

AR.RC: Repair Criteria (HCA)

3. Question Result, ID, References **NA, AR.RC.SCHEDULEIMPL.R, 192.947(f) (192.933(d))**
Question Text *Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?*
Assets Covered **88967 (1,832)**
Result Notes **No HCAs, anomalies, or covered segments on Solvay's system. No such relevant facilities/equipment existed in the scope of inspection review.**

AR.RMP: Repair Methods and Practices

4. Question Result, ID, References **NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**
Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*
Assets Covered **88967 (1,832)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Solvay, due to the nature of their production facility, uses work permits for many tasks. Both hot and non-hot work permits are used, for example, for activities performed on the pipeline system such as taking PSP readings or performing rectifier checks.**
5. Question Result, ID, References **NA, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-2004 Section 7)**
Question Text *From the review of records, were all repairs performed in accordance with processes, applicable sections of 49 CFR Parts 192 and the guidance of ASME B31.8S-2004, Section 7, and the Pipeline Repair Manual, Revision 5?*
Assets Covered **88967 (1,832)**

Result Notes No repairs to the pipeline have been performed. No such event occurred, or condition existed, in the scope of inspection review.

6. Question Result, ID, References NA, AR.RMP.REPAIRQUAL.R, 192.807(b) (192.805(h))

Question Text *From the review of selected records, were personnel performing repairs, other than welding, and post repair tests qualified for the task they performed?*

Assets Covered 88967 (1,832)

Result Notes No repairs to the pipeline have been performed. No such event occurred, or condition existed, in the scope of inspection review.

7. Question Result, ID, References NA, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)

Question Text *From the review of records, were any components that were replaced constructed to the same or higher standards as the original component?*

Assets Covered 88967 (1,832)

Result Notes No repairs to the pipeline have been performed. No such event occurred, or condition existed, in the scope of inspection review.

8. Question Result, ID, References NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88967 (1,832)

Result Notes No repairs to the pipeline have been performed. No such event occurred, or condition existed, in the scope of inspection review.

DC.CO: Construction

9. Question Result, ID, References NA, DC.CO.CLEAR.R, 192.325(a) (192.325(b), 192.325(c))

Question Text *Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe?*

Assets Covered 88967 (1,832)

Result Notes The pipeline has suitable clearance. No such event occurred, or condition existed, in the scope of inspection review. The line was replaced in 2006.

DC.WELDINSPECTION: Construction Weld Inspection

10. Question Result, ID, References NA, DC.WELDINSPECTION.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)

Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*

Assets Covered 88967 (1,832)

Result Notes No new construction since 2006. No such event occurred, or condition existed, in the scope of inspection review.

11. Question Result, ID, References NA, DC.WELDINSPECTION.WELDNDET.R, 192.243

Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*

Assets Covered 88967 (1,832)

Result Notes No new construction since 2006. No such event occurred, or condition existed, in the scope of inspection review.

DC.WELDPROCEDURE: Construction Welding Procedures

12. Question Result, ID, References NA, DC.WELDPROCEDURE.WELD.R, 192.225

Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*

Assets Covered 88967 (1,832)

Result Notes No new construction since 2006. No such event occurred, or condition existed, in the scope of inspection review.

DC.COMM: Pipeline Commissioning

13. Question Result, ID, References Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3)) (also presented in: MO.GO)
Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*
Assets Covered 88967 (1,832)
Result Notes Pipeline alignment sheets and as-builts are available and were reviewed during this inspection. They are available to operating personnel.
14. Question Result, ID, References Sat, MO.GO.OMLOCATION.O, 192.605(a) (also presented in: MO.GO)
Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*
Assets Covered 88967 (1,832)
Result Notes Pipeline alignment sheets and as-builts are available and were reviewed during this inspection. They are available to operating personnel. The O&M manual is online and the construction book is available in the office on-site where the facility is located and work is performed.
15. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: EP.ERG, PD.PA)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
Assets Covered 88967 (1,832)
Result Notes The public awareness letter goes out every year. Solvay provided return receipts and we reviewed 2017, 2018, and 2019 receipts. For example, Nippon Paper, Longview Fire, HASA, and PUD, mailings were reviewed.
16. Question Result, ID, References NA, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d)) (also presented in: DC.DPC)
Question Text *Are transmission line valves being installed as required by 192.179?*
Assets Covered 88967 (1,832)
Result Notes No jurisdictional valves. No such relevant facilities/equipment existed in the scope of inspection review.
17. Question Result, ID, References NA, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b)) (also presented in: MO.GM)
Question Text *Are field inspection and partial operation of transmission line valves adequate?*
Assets Covered 88967 (1,832)
Result Notes No jurisdictional valves. No such relevant facilities/equipment existed in the scope of inspection review.
18. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS, MO.GO)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered 88967 (1,832)
Result Notes No unsatisfactory conditions occurred, or condition existed, in the scope of the inspection review.
19. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c) (also presented in: PD.DP)
Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
Assets Covered 88967 (1,832)
Result Notes Several records checked. Solvay has not had an excavator dig with out a One Call ticket. Due to the short distance of the line ~90% of one call tickets are able to be cleared because the line crosses one public road.
20. Question Result, ID, References Sat, PD.DP.ONECALL.O, 192.614(c)(3) (also presented in: PD.DP)
Question Text *Observe Operator process a "One Call" ticket.*
Assets Covered 88967 (1,832)

Result Notes The operator receives emails w/ all locate requests. Several records were checked. They process 7-8/yr. In 2018, there were 4 locate requests. If they confirm that the locate request is near the line, Solvay calls their OQ qualified contractor, NMF, to locate the line.

21. Question Result, ID, References NA, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a)) (also presented in: IM.PM)

Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*

Assets Covered 88967 (1,832)

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

22. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: TQ.TR)

Question Text *Is training for emergency response personnel documented?*

Assets Covered 88967 (1,832)

Result Notes The emergency response plan uses Longview Fire Department for response in the public ROW. If there is an emergency, operations can shut down the flow.

23. Question Result, ID, References Sat, TQ.OO.RECORDS.R, 192.807 (also presented in: TQ.OO)

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 88967 (1,832)

Documents Reviewed 1. Yechout's OQ Records

Result Notes Records reviewed for OQ tasks were for NWF 2017 Brian Yechout performed tasks until Sept 2018. Task performed 9-19-18. Eric Larson performed starting 10-23-18 and 2019.

24. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a)) (also presented in: TQ.PROT9)

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*

Assets Covered 88967 (1,832)

Result Notes Eric Larson performed for this inspection. Please review Form R for his OQ records.

DC.DPC: Design of Pipe Components

25. Question Result, ID, References NA, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d)) (also presented in: DC.COMM)

Question Text *Are transmission line valves being installed as required by 192.179?*

Assets Covered 88967 (1,832)

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

26. Question Result, ID, References NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))

Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 88967 (1,832)

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

27. Question Result, ID, References NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))

Question Text *Does the transmission project's design and construction comply with 192.476?*

Assets Covered 88967 (1,832)

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

DC.MO: Maintenance and Operations

28. Question Result, ID, References **Sat, DC.MO.MAOPLIMIT.O, 192.605(b)(5)**
Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*
Assets Covered **88967 (1,832)**
Result Notes **I looked at two years of pressure logs. Very consistent pressures of 55-60 psig.**

EP.ERG: Emergency Response

29. Question Result, ID, References **NA, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))**
Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*
Assets Covered **88967 (1,832)**
Result Notes **No emergencies have occurred. No such event occurred, or condition existed, in the scope of inspection review.**
30. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: DC.COMM, PD.PA)**
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
Assets Covered **88967 (1,832)**
Result Notes **The public awareness letter goes out every year. Solvay provided return receipts and we reviewed 2017, 2018, and 2019 receipts. For example, Nippon Paper, Longview Fire, HASA, and PUD, mailings were reviewed.**

IM.CA: Continual Evaluation and Assessment

31. Question Result, ID, References **NA, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))**
Question Text *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*
Assets Covered **88967 (1,832)**
Result Notes **No IMP program. No such relevant facilities/equipment existed in the scope of inspection review.**

IM.PM: Preventive and Mitigative Measures

32. Question Result, ID, References **NA, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a)) (also presented in: DC.COMM)**
Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*
Assets Covered **88967 (1,832)**
Result Notes **No IMP program. No such relevant facilities/equipment existed in the scope of inspection review.**

MO.GC: Conversion to Service

33. Question Result, ID, References **NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b))**
Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*
Assets Covered **88967 (1,832)**
Result Notes **No IMP program. No such relevant facilities/equipment existed in the scope of inspection review.**

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

34. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))**
Question Text *Did personnel respond to indications of abnormal operations as required by the process?*

Assets Covered 88967 (1,832)

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

35. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered 88967 (1,832)

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

MO.GOCLASS: Gas Pipeline Class Location

36. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATEREV.O, 192.611(a)

Question Text *Are current ROW conditions and class locations consistent?*

Assets Covered 88967 (1,832)

Result Notes The pipeline is in an industrial area. ROW conditions have not changed.

37. Question Result, ID, References NA, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?*

Assets Covered 88967 (1,832)

Result Notes Solvay operates in a dense industrial area and class location changes cannot occur due to population density changes. The hoop stress will not exceed 40% SMYS due to design and compression equipment limitations. No such event occurred, or condition existed, in the scope of inspection review.

38. Question Result, ID, References NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered 88967 (1,832)

Result Notes The population around the pipeline cannot increase as it is surrounded by industrial facilities. No such event occurred, or condition existed, in the scope of inspection review.

39. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 88967 (1,832)

Result Notes Solvay performs field inspections of system monthly.

40. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: DC.COMM, MO.GO)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 88967 (1,832)

Result Notes No unsatisfactory conditions occurred, or condition existed, in the scope of the inspection review.

MO.GOMAOP: Gas Pipeline MAOP

41. Question Result, ID, References Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b))

Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*

Assets Covered 88967 (1,832)

Result Notes MAOP is 150 psig. Pressure test minimum was 225 psig and the max was 250 psig. The pipe specs are 6.625" Diameter, X42/52 .280 WT. The PT was performed on 10-2-2006.

MO.GM: Gas Pipeline Maintenance

42. Question Result, ID, Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also References presented in: MO.GMOPP)
Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*
Assets Covered 88967 (1,832)
Result Notes Solvay has been maintaining all inspection records.
43. Question Result, ID, NA, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))
References
Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*
Assets Covered 88967 (1,832)
Result Notes Solvay has not needed to use hot work permits on the pipeline system, but they do so for plant operations. No such event occurred, or condition existed, in the scope of inspection review.
44. Question Result, ID, NA, MO.GM.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))
References
Question Text *Are the operator's precautionary measures adequate on a gas transmission line where there exists the potential for accidental ignition?*
Assets Covered 88967 (1,832)
Result Notes This condition did not occur during our inspection, but NMF did pull a "non-hot work permit" for the rectifier testing and PSP readings we took on the pipeline system. No such event occurred, or condition existed, in the scope of inspection review.
45. Question Result, ID, NA, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))
References
Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*
Assets Covered 88967 (1,832)
Result Notes No jurisdictional valves on the pipeline system. No such relevant facilities/equipment existed in the scope of inspection review.
46. Question Result, ID, NA, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b)) (also presented in: DC.COMM)
References
Question Text *Are field inspection and partial operation of transmission line valves adequate?*
Assets Covered 88967 (1,832)
Result Notes No jurisdictional valves. No such relevant facilities/equipment existed in the scope of inspection review.

MO.GO: Gas Pipeline Operations

47. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also References presented in: MO.GOCLASS)
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
Assets Covered 88967 (1,832)
Result Notes Solvay performs field inspections of system monthly.
48. Question Result, ID, NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also References presented in: DC.COMM, MO.GOCLASS)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered 88967 (1,832)
Result Notes No unsatisfactory conditions occurred, or condition existed, in the scope of the inspection review.

49. Question Result, ID, References **Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)**
 Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*
 Assets Covered **88967 (1,832)**
 Result Notes **O&M manual is reviewed annually. If there is a modification they send it to the UTC. If there are no revisions, they mark it on the log. Revisions performed 8/1/2019, 9/28/2019, 7/24/2018, 5/16/2017, and 5/4/2017.**
50. Question Result, ID, References **Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))**
 Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
 Assets Covered **88967 (1,832)**
 Result Notes **Annual audit of contractor dated 10/30/19 was reviewed. Solvay started performing this in 2018.**
51. Question Result, ID, References **Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3)) (also presented in: DC.COMM)**
 Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*
 Assets Covered **88967 (1,832)**
 Result Notes **Pipeline alignment sheets and as-builts are available and were reviewed during this inspection. They are available to operating personnel.**
52. Question Result, ID, References **Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)**
 Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*
 Assets Covered **88967 (1,832)**
 Result Notes **They were available both during the records and the field portion.**
53. Question Result, ID, References **Sat, MO.GO.OMLOCATION.O, 192.605(a) (also presented in: DC.COMM)**
 Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*
 Assets Covered **88967 (1,832)**
 Result Notes **Pipeline alignment sheets and as-builts are available and were reviewed during this inspection. They are available to operating personnel. The O&M manual is online and the construction book is available in the office on-site where the facility is located and work is performed.**
54. Question Result, ID, References **NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))**
 Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*
 Assets Covered **88967 (1,832)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No uprates have occurred.**

MO.GMOPP: Gas Pipeline Overpressure Protection

55. Question Result, ID, References **NA, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))**
 Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*
 Assets Covered **88967 (1,832)**
 Result Notes **No jurisdictional relief equipment existed in the scope of inspection review.**
56. Question Result, ID, References **Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)**
 Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay has been maintaining all inspection records.**

57. Question Result, ID, References **NA, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))**
Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*
Assets Covered **88967 (1,832)**
Result Notes **No jurisdictional facilities/equipment existed in the scope of inspection review. In my previous inspection in 2011, Equa Chlor records showed the compressor was not capable to operate above 65 psig.**

Equachlor is now Westlake.

The operator provided the following information for this inspection.

"Scenario 1: Overpressure from Westlake:

1) The compressor max discharge pressure is limited to 100PSIG. Re-confirmed with Westlake on 1/8/2019

2) Westlake has a pressure control valve that will close if the system gets to 70psig and there is also a pressure safety valve on the compressor outlet that is set at 100psig.

Scenario 2: Overpressure from Solvay:

We have a safety interlock in our safety system that closes the valve from the pipeline at our battery limit if the pressure reaches 145PSIG. We test this interlock annually."

58. Question Result, ID, References **NA, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)**
Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*
Assets Covered **88967 (1,832)**
Result Notes **No jurisdictional regulating stations, pressure limiting stations or relief devices on the Solvay pipeline system. No such relevant facilities/equipment existed in the scope of inspection review.**

PD.DP: Damage Prevention

59. Question Result, ID, References **Sat, PD.DP.ONECALL.O, 192.614(c)(3) (also presented in: DC.COMM)**
Question Text *Observe Operator process a "One Call" ticket.*
Assets Covered **88967 (1,832)**
Result Notes **The operator receives emails w/ all locate requests. Several records were checked. They process 7-8/yr. In 2018, there were 4 locate requests. If they confirm that the locate request is near the line, Solvay calls their OQ qualified contractor, NMF, to locate the line.**

60. Question Result, ID, References **Sat, PD.DP.PDPROGRAM.R, 192.614(c) (also presented in: DC.COMM)**

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
Assets Covered 88967 (1,832)
Result Notes Several records checked. Solvay has not had an excavator dig with out a One Call ticket. Due to the short distance of the line ~90% of one call tickets are able to be cleared because the line crosses one public road.

61. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered 88967 (1,832)

Result Notes Solvay has NMF survey the pipeline monthly and there have been no encroachments, near misses, or damages.

PD.PA: Public Awareness

62. Question Result, ID, References NA, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*

Assets Covered 88967 (1,832)

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

63. Question Result, ID, References Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))

Question Text *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?*

Assets Covered 88967 (1,832)

Result Notes There is no affected public because the pipeline crosses Industrial Way and all the vehicles are in transit. Local public officials, emergency officials are contacted. Local government, Solvay, and it's industrial plant neighbors are the only parties involved. I reviewed the mailer with return receipt records.

64. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))

Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*

Assets Covered 88967 (1,832)

Result Notes The messages were delivered and return receipts were reviewed for affected municipalities and businesses with the exception of school districts and residents - there are none.

65. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)

Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*

Assets Covered 88967 (1,832)

Result Notes The messages were delivered and return receipts were reviewed. They are sent out annually.

66. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: DC.COMM, EP.ERG)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 88967 (1,832)

Result Notes The public awareness letter goes out every year. Solvay provided return receipts and we reviewed 2017, 2018, and 2019 receipts. For example, Nippon Paper, Longview Fire, HASA, and PUD, mailings were reviewed.

67. Question Result, ID, References **NA, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)**
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
 Assets Covered **88967 (1,832)**
 Result Notes **English is the language used by the businesses, local government, and fire departments in the pipeline's location. No such event occurred, or condition existed, in the scope of inspection review.**
68. Question Result, ID, References **Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)**
 Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*
 Assets Covered **88967 (1,832)**
 Result Notes **A public awareness review was done around September per the operator. (i.e. Updated Weyerhaeuser to reflect the name change to Nippon Dynawave) Additionally, It was reviewed on 10/13/2017 and 9/15/2018.**
69. Question Result, ID, References **Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)**
 Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay performs an annual internal assessment.**
70. Question Result, ID, References **Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)**
 Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*
 Assets Covered **88967 (1,832)**
 Result Notes **No changes were needed. There was a name change only.**
71. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)**
 Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*
 Assets Covered **88967 (1,832)**
 Result Notes **Each year Solvay completes the PA annual review form and question 8 covers this topic by asking the question. "8) Since the last audit form has been filed, has the Public awareness program been effective in the prevention of incidents?"**
- The procedure is: 5.5 Internal Audit and Evaluation of Effectiveness The Engineering & Maintenance Manager shall complete the Hydrogen Pipeline Public Awareness Program Audit Form HSE3915-F which covers both annual audit and 4 years effectiveness evaluation and is completed annually. Upon completion, the form will be maintained electronically on the company intranet (Team Sites).
72. Question Result, ID, References **Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)**
 Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
 Assets Covered **88967 (1,832)**
 Result Notes **Stakeholder outreach is documented when annual mailings are sent out and when Local Emergency Planning Committee (LEPC) meetings are attended.**
73. Question Result, ID, References **Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)**
 Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay tracks each individual stakeholder and keeps records of correspondence.**

Stakeholders are:

Nippon Paper Company

HASA, Inc.

Cowlitz PUD

Longview Fire Department

Cowlitz 2 Fire & Rescue

City of Longview Public Works

Cowlitz County Public Works

CDID#1 Consolidated Diking Improvement District #1

74. Question Result, ID, References **Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)**
Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*
Assets Covered **88967 (1,832)**
Result Notes **Solvay has not had any near misses, damages, or excavations near their pipeline. Solvay can directly observe their entire pipeline and the effectiveness reviews have stated that there is no issues or areas of improvement needed.**
75. Question Result, ID, References **Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)**
Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*
Assets Covered **88967 (1,832)**
Result Notes **Yes they do track them. There have been 0 occurrences.**
76. Question Result, ID, References **NA, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)**
Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*
Assets Covered **88967 (1,832)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

PD.SP: Special Permits

77. Question Result, ID, References **NA, PD.SP.REPAIR.R, 190.341(d)(2)**
Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*
Assets Covered **88967 (1,832)**
Result Notes **AMOAP is not used. No such relevant facilities/equipment existed in the scope of inspection review.**
78. Question Result, ID, References **NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)**
Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*
Assets Covered **88967 (1,832)**
Result Notes **Solvay is not using AMAOP. No such relevant facilities/equipment existed in the scope of inspection review.**

RPT.NR: Notices and Reporting

79. Question Result, ID, References **NC, RPT.NR.NOTIFYOQ.P, 192.805(i)**
Question Text *Does the OQ Program require the Administrator or state agency to be notified if the operator significantly modifies its program?*
Assets Covered **88967 (1,832)**
Result Notes **This will be reviewed in the 2020 Solvay Operator Qualification (OQ) Program review (Inspection ID 8021).**
80. Question Result, ID, References **NA, RPT.NR.NOTIFYOQ.R, 192.805(i)**
Question Text *Do records indicate the Administrator or state agency was notified when the OQ Program was significantly modified?*
Assets Covered **88967 (1,832)**
Result Notes **The OQ program has not been significantly modified. The OQ qualified personnel that perform covered tasks on the pipeline are covered under Northwest Metal Fabrication's plan. No such event occurred, or condition existed, in the scope of inspection review.**
81. Question Result, ID, References **NC, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b)**
Question Text *Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?*
Assets Covered **88967 (1,832)**
Result Notes **This will be reviewed in our technical assistance inspection later this year (2020) for the status change-over from distribution to transmission.**
82. Question Result, ID, References **NA, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b))**
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?*
Assets Covered **88967 (1,832)**
Result Notes **Solvay does not have an Integrity Management Program. They are in a class 1 location and have no HCAs.**
83. Question Result, ID, References **NA, RPT.NR.NOTIFYIMPRESS.P, 192.933(a)(1)**
Question Text *Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?*
Assets Covered **88967 (1,832)**
Result Notes **Solvay has no HCAs or identified sites. Solvay does not perform integrity assessments. No such requirement existed in the scope of inspection review.**
84. Question Result, ID, References **NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))**
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*
Assets Covered **88967 (1,832)**
Result Notes **Solvay does not have an Integrity Management Program. They are in a class 1 location and have no HCAs.**
85. Question Result, ID, References **NA, RPT.NR.IMDEVIATERPT.P, 192.913(b)(1)(vii)**
Question Text *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*
Assets Covered **88967 (1,832)**
Result Notes **Solvay has no HCAs or identified sites. No such requirement existed in the scope of inspection review.**

86. Question Result, ID, References **NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii))**
 Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay does not have an Integrity Management Program. They are in a class 1 location and have no HCAs.**
87. Question Result, ID, References **NA, RPT.NR.IMPERFRPT.P, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)**
 Question Text *Is there a process for annual reporting of integrity management performance data?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay has no HCAs or identified sites. No such requirement existed in the scope of inspection review.**
88. Question Result, ID, References **NA, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)**
 Question Text *Do annual reports demonstrate that integrity management performance data were reported?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay does not have an Integrity Management Program. They are in a class 1 location and have no HCAs.**

RPT.RR: Regulatory Reporting (Traditional)

89. Question Result, ID, References **Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)**
 Question Text *Have complete and accurate Annual Reports been submitted?*
 Assets Covered **88967 (1,832)**
 Result Notes **Yes. The operator agreed to submit their system as transmission next year due to the status change. This will be addressed in a technical assistance inspection later in 2020.**
90. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))**
 Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*
 Assets Covered **88967 (1,832)**
 Result Notes **No incidents have occurred. No such event occurred, or condition existed, in the scope of inspection review.**
91. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)**
 Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*
 Assets Covered **88967 (1,832)**
 Result Notes **No incidents have occurred. No such event occurred, or condition existed, in the scope of inspection review.**
92. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORT.R, 191.15(a)**
 Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 within the required timeframe?*
 Assets Covered **88967 (1,832)**
 Result Notes **No incidents have occurred. No such event occurred, or condition existed, in the scope of inspection review.**
93. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b))**
 Question Text *Do records indicate safety-related condition reports were filed as required?*
 Assets Covered **88967 (1,832)**
 Result Notes **No safety related conditions have occurred. No such event occurred, or condition existed, in the scope of inspection review.**
94. Question Result, ID, References **Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))**

Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*

Assets Covered 88967 (1,832)

Result Notes The operators status was recently changed to transmission and the operator agreed to start submitting data to the NPMS.

95. Question Result, ID, References Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))

Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered 88967 (1,832)

TD.ATM: Atmospheric Corrosion

96. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered 88967 (1,832)

Result Notes I noted the aboveground portions of the pipeline had suitable coating. Pipe supports at the span were also checked and there did not appear to be accelerated or localized corrosion.

97. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c))

Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*

Assets Covered 88967 (1,832)

Result Notes The last atmospheric corrosion inspection was conducted on 4.-23-2019.

98. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*

Assets Covered 88967 (1,832)

Result Notes The last atmospheric corrosion inspection was completed on 4-23-2019 and it was reviewed.

TD.CPMONITOR: External Corrosion - CP Monitoring

99. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered 88967 (1,832)

Result Notes I reviewed records for rectifiers for the past several years and rectifiers are checked monthly.

100. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a))

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 88967 (1,832)

Result Notes CP readings were taken using an interrupter to account for IR drop. Equipment was calibrated and current . Please review the field notes for more detail.

101. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a))

Question Text *Do records document that the CP monitoring criteria used was acceptable?*

Assets Covered 88967 (1,832)

Result Notes The records have shown that isolation has been suitable, no shorted casings have been identified, and enough current has been applied to the system to have "instant-off" readings that meet the -850mV CSE polarized criteria. Native potential measurements were taken on 10/9/2006 and interrupted readings have been taken before (i.e. 8/26/2008) to account for IR drop. Not all previous inspections have had

instant off readings recorded or taken, but IR drop is being considered by the operator and it's corrosion consultant.

102. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))
Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*
Assets Covered 88967 (1,832)
Result Notes PSP readings are taken every two months. Samples from several years of records were reviewed. There were no issues or concerns.
103. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)
Question Text *Are impressed current sources properly maintained and are they functioning properly?*
Assets Covered 88967 (1,832)
Result Notes Rectifier was well maintained in a protected location inside Solvay's plant. The settings were C1 F1 and very little current was used to drive the system. Please review the field notes for more detail.
104. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))
Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*
Assets Covered 88967 (1,832)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
105. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)
Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*
Assets Covered 88967 (1,832)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
106. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))
Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*
Assets Covered 88967 (1,832)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
107. Question Result, ID, References NA, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))
Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*
Assets Covered 88967 (1,832)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
108. Question Result, ID, References NA, TD.CPMONITOR.TESTLEAD.O, 192.471(a) (192.471(b), 192.471(c))
Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*
Assets Covered 88967 (1,832)
Result Notes No test leads were observed during the field portion. PSP readings were taken directly at flanges, aboveground line pipe locations, and metal casing vents. No such relevant facilities/equipment existed in the scope of inspection review.
109. Question Result, ID, References NA, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))
Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*
Assets Covered 88967 (1,832)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

110. Question Result, ID, References **NA, TD.CP.MONITOR.INTFCURRENT.O, 192.473(a)**
 Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*
 Assets Covered **88967 (1,832)**
 Result Notes **No stray current sources either AC or DC were identified. No such activity/condition was observed during the inspection.**
111. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CP, TD.CPEXPOSED)
 Question Text *Do records indicate the location of all items listed in 192.491(a)?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay has alignment sheets, as-builts, and descriptive locations to indicate locations of test sites and pipeline components.**

TD.CP: External Corrosion - Cathodic Protection

112. Question Result, ID, References **Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))**
 Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
 Assets Covered **88967 (1,832)**
113. Question Result, ID, References **NA, TD.CP.PRE1971.R, 192.491(c) (192.457(b))**
 Question Text *Do records document that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations have been cathodically protected in areas where active corrosion was found?*
 Assets Covered **88967 (1,832)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
114. Question Result, ID, References **NA, TD.CP.PRE1971.O, 192.457(b)**
 Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?*
 Assets Covered **88967 (1,832)**
 Result Notes **No compressor, metering, or regulator stations exist or were installed before August 1, 1971. No such relevant facilities/equipment existed in the scope of inspection review.**
115. Question Result, ID, References **NA, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e))**
 Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*
 Assets Covered **88967 (1,832)**
 Result Notes **Solvay's pipeline is coated and protected by IC CP. Please review the field notes. Polarized potentials utilizing the "instant off" method were taken during this inspection. All carrier pipe readings met the "-850mV CSE polarized" criteria. No such relevant facilities/equipment existed in the scope of inspection review.**
116. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))**
 Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*
 Assets Covered **88967 (1,832)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
117. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))**

Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88967 (1,832)

Result Notes These tests are performed every other month. I reviewed a random selection of records. All reviewed were suitable.

118. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88967 (1,832)

Result Notes Isolation was checked at the flanges both upstream and downstream of the jurisdictional piping. Please review the field notes for the reads collected.

119. Question Result, ID, References NA, TD.CP.FAULTCURRENT.R, 192.491(c) (192.467(f))

Question Text *Do records adequately document the installation and inspection of fault current and lightning protection?*

Assets Covered 88967 (1,832)

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

120. Question Result, ID, References NA, TD.CP.FAULTCURRENT.O, 192.467(f)

Question Text *Are fault current and lightning protection for the pipeline installed and inspected?*

Assets Covered 88967 (1,832)

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

121. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CP.MONITOR, TD.CP.EXPOSED)

Question Text *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered 88967 (1,832)

Result Notes Solvay has alignment sheets, as-builts, and descriptive locations to indicate locations of test sites and pipeline components.

TD.COAT: External Corrosion - Coatings

122. Question Result, ID, References Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*

Assets Covered 88967 (1,832)

Result Notes This is in project documentation. The system is FBE coated. It also draws very, very little current.

123. Question Result, ID, References NA, TD.COAT.NEWPIPENOCOAT.R, 192.491(c) (192.455(b))

Question Text *If a buried or submerged pipeline installed after July 31, 1971 was not installed with an external protective coating do records provide adequate documentation why such a coating was not necessary to protect the pipe from external corrosion?*

Assets Covered 88967 (1,832)

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

124. Question Result, ID, References NA, TD.COAT.NEWPIPEINSTALL.R, 192.491(c) (192.461(c), 192.461(d), 192.461(e), 192.483(a))

Question Text *Do records document that acceptable external protective coating materials have been used and the application and inspection was done in accordance with the written procedures?*

Assets Covered 88967 (1,832)

Result Notes No new buried pipe has been installed since 2006. No such event occurred, or condition existed, in the scope of inspection review.

125. Question Result, ID, References **NA, TD.COAT.COATAPPLY.O, 192.461(a) (192.461(c), 192.461(d), 192.461(e), 192.319(b), 192.483(a))**
Question Text *Is protective coating adequately applied?*
Assets Covered **88967 (1,832)**
Result Notes **I did not observe the coating being applied during this inspection. No such activity/condition was observed during the inspection.**

TD.CPEXPOSED: External Corrosion - Exposed Pipe

126. Question Result, ID, References **NA, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)**
Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
Assets Covered **88967 (1,832)**
Result Notes **No buried piping has been exposed - No excavations have occurred.**
127. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CP.MONITOR, TD.CP)**
Question Text *Do records indicate the location of all items listed in 192.491(a)?*
Assets Covered **88967 (1,832)**
Result Notes **Solvay has alignment sheets, as-builts, and descriptive locations to indicate locations of test sites and pipeline components.**

TD.ICP: Internal Corrosion - Preventive Measures

128. Question Result, ID, References **NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))**
Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
Assets Covered **88967 (1,832)**
Result Notes **No buried piping has been exposed - No excavations have occurred. No pipe has been removed. No such event occurred, or condition existed, in the scope of inspection review.**
129. Question Result, ID, References **NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))**
Question Text *Is removed pipe examined for evidence of internal corrosion?*
Assets Covered **88967 (1,832)**
Result Notes **Pipe has not been removed or added to the system since 2006. This task was not being performed during this inspection.**
130. Question Result, ID, References **NC, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.485(c))**
Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*
Assets Covered **88967 (1,832)**
Result Notes **This will be reviewed in our technical assistance inspection later this year (2020) for the status change-over from distribution to transmission.**

Page 19 and 20 of Solvay's O&M manual contains an indirect reference to this, but no portions of the pipeline have been removed or added since 2006. Additionally, no external corrosion issues have been identified requiring analysis and remediation.

131. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))**
Question Text *Do records document adequate evaluation of internally corroded pipe?*
Assets Covered **88967 (1,832)**
Result Notes **No buried piping has been exposed - No excavations have occurred. No pipe has been removed. No such event occurred, or condition existed, in the scope of inspection review.**

132. Question Result, ID, References **NC, TD.ICP.REPAIR.P, 192.491(c) (192.485(a), 192.485(b))**
 Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*
 Assets Covered **88967 (1,832)**
 Result Notes **This will be reviewed in our technical assistance inspection later this year (2020) for the status change-over from distribution to transmission.**
133. Question Result, ID, References **NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))**
 Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
 Assets Covered **88967 (1,832)**
 Result Notes **No buried piping has been exposed - No excavations have occurred. No pipe has been removed. No such event occurred, or condition existed, in the scope of inspection review.**

TD.ICCG: Internal Corrosion - Corrosive Gas

134. Question Result, ID, References **NA, TD.ICCG.CORRGAS.R, 192.491(c) (192.475(a))**
 Question Text *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*
 Assets Covered **88967 (1,832)**
 Result Notes **It is a pure hydrogen line, odorless, with no sulfides that can contribute to internal corrosion.**

TQ.PROT9: OQ Protocol 9

135. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**
 Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*
 Assets Covered **88967 (1,832)**
 Result Notes **No issues have been identified and corrected that I observed in Northwest Metal Fabs inspection.**
136. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a)) (also presented in: DC.COMM)**
 Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*
 Assets Covered **88967 (1,832)**
 Result Notes **Eric Larson performed for this inspection. Please review Form R for his OQ records.**
137. Question Result, ID, References **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**
 Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*
 Assets Covered **88967 (1,832)**
 Result Notes **I verified that Eric Larson was qualified to perform the CP testing before we performed field work. Please review field notes for more detail.**
138. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**
 Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*
 Assets Covered **88967 (1,832)**
 Result Notes **Mr. Larson (NMF) was very cognoscente of AOCs when checking the rectifier from both a human safety aspect and when he attached the interrupter to time the current flow for the PSP testing. An example of this was him removing the positive lead (anode) from the terminal block itself rather than the wire from the terminal connector to minimize header lead corrosion or re-torquing issues with the terminal connector.**

139. Question Result, ID, References **NA, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**
Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*
Assets Covered **88967 (1,832)**
Result Notes **Eric Larson was the only OQ qualified person during this inspection. No review of other individuals performing tasks was necessary. No such event occurred, or condition existed, in the scope of inspection review.**

TQ.OQ: Operator Qualification

140. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))**
Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
Assets Covered **88967 (1,832)**
Result Notes **Since the operator solely uses contractor personnel, NMFs OQ's and notes used to populate the response to TQ.OQ.RECORDS.R should be reviewed. In this instance, this is a repeated question**
141. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 192.807 (also presented in: DC.COMM)**
Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
Assets Covered **88967 (1,832)**
Documents Reviewed **1. Yechout's OQ Records**
Result Notes **Records reviewed for OQ tasks were for NWF 2017 Brian Yechout performed tasks until Sept 2018. Task performed 9-19-18. Eric Larson performed starting 10-23-18 and 2019.**

TQ.QU: Qualification of Personnel - Specific Requirements

142. Question Result, ID, References **Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))**
Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*
Assets Covered **88967 (1,832)**
Result Notes **Eric Larson produced his NACE Level II certification and I reviewed his OQ's for CP tasks. Please reference Form R in the attachments**

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

143. Question Result, ID, References **NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**
Question Text *Do records indicate the qualification of nondestructive testing personnel?*
Assets Covered **88967 (1,832)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
144. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**
Question Text *Do records indicate that welders are adequately qualified?*
Assets Covered **88967 (1,832)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.TR: Training of Personnel

145. Question Result, ID, References **Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: DC.COMM)**

Question Text *Is training for emergency response personnel documented?*

Assets Covered 88967 (1,832)

Result Notes The emergency response plan uses Longview Fire Department for response in the public ROW. If there is an emergency, operations can shut down the flow.

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.