

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

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

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

Inspection Report			
Inspection ID/ Docket Number	8035		
Inspector Name & Submit Date	Anthony Dorrough, 10/28/2020		
Chief Engineer Name & Review Date	Joe Subsits 10/29/2020		
Operator Information			
Name of Operator:	Petrogas West, LLC	OPID #:	39663
Name of Unit(s):	Petrogas West, LLC 4100 Unick Road Ferndale, WA 98248		
Records Location:	Same		
Date(s) of Last Review:	12/13/2018	Inspection Date(s)	8/19/2020

<p>Inspection Summary: This Standard Comprehensive inspection covered all applicable provisions of WAC 480-93 that pertain to the Petrogas West LLC (Petrogas) hazardous liquid transmission pipeline. This inspection included a review of process and records, there were no significant findings or follow-up actions.</p>

HQ Address: Petrogas West, LLC 4100 Unick Road Ferndale, WA 98248		System/Unit Address: Petrogas West, LLC 4100 Unick Road Ferndale, WA 98248	
Co. Official:	Gary McSpadden	Phone No.:	360-384-1701
Phone No.:	360-384-1701	Fax No.:	
Fax No.:		Emergency Phone No.:	1-866-975-1011
Emergency Phone No.:	1-866-975-1011		
Persons Interviewed	Title	Phone No.	
Gary McSpadden	Facility Manager	360-384-1701	
Gatlin McConnell	HSSE Manager	360-384-1701	
Michael Evans	PSM/Training Supervisor	360-384-1701	
Cody Treloar	PSM Field Specialist	360-384-1701	
Philip Mhyre	Maintenance Coordinator	360-384-1701	

Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:

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UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.	
(check one below and enter appropriate date)	
Team inspection was performed (Within the past five years.) or,	Date: <input style="width: 100px;" type="text"/>
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date: <input style="width: 100px;" type="text"/>
Any revisions to O&M manual since last review? Yes No If yes, review revisions made.	

Comments:

REPORTING		S	U	N/A	N/C		
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? ---Last updated: June 02, 2020 RY2019		X			
2.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted? ---Last updated: June 02, 2020 RY2019		X			
3.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction ---No new construction				X	
4.	480-75-620	Was MOP changed based on hydrotest? Report submitted? ---No Change				X	
5.	480-75-630(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours of discovery) for events which results in: a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection. ---No Incidents/Reports				X	
6.	480-75-630(2)	Written reports to the commission within 30 calendar days of the incident. The report must include the following: a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; (b) The extent of injuries and damage; (c) A description of the incident including date, time, and place; (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident; (e) The date and time the pipeline returns to safe operations; and (f) The date, time, and type of any temporary or permanent repair. ---No Incidents/Reports				X	
7.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes ---No accidents				X	

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8.	195.442(c)(6)	Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? ---No accidents/failures				X	
9.	480-75-630(3)	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline. ---No notifications				X	
10.	49 CFR 195.402	Did the operator follow written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? ---Management is notified of any One Call notifications. Markings maintained on County Right of Way	X				
11.	442(c)(6)	Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? ---24/7 Facility surveillance. Personnel will take actions if unexpected drilling machinery arrive at or near the facility				X	
12.	480-75-630(4)	Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form)	S	U	N/A	N/C	
13.	480-75-630(4)(a)	<ul style="list-style-type: none"> Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) 				X	
14.	480-75-630(4)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed?				X	
15.	480-75-630(4)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? Note: Records maintained for two years and made available to the commission upon request.				X	
16.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities?	S	U	N/A	N/C	
17.	480-75-630(5)(a)	Notification requirements for excavators under RCW 19.122.050(1) ---Requirements provided on Petrogas Website	X				
18.	480-75-630(5)(b)	A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and ---Requirements provided on Petrogas Website	X				
19.	480-75-630(5)(c)	Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. ---Provided on Petrogas Website	X				
20.	480-75-630(6)	<ul style="list-style-type: none"> An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (630(6)(a) A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b) ---Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> 				X	
21.	Damage Prevention (Operator Internal Performance Measures PHMSA – State Program Evaluation Questions	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) ---Petrogas conducts its own markings (30ft of pipeline in County right-of-way). Inspections conducted twice per day – per. MIP 202- Right-of-Way Maintenance and Inspection	X				
22.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? ---Petrogas does not have locating service contracts				X	

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23.	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? ---Petrogas does not have locating service contractors			X	
24.	Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? ---Locations are conducted via “line of site” – per. MIP 202-Right-of-Way Maintenance and Inspection			X	
25.	Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. ---Located in MIP 202- Right-of-Way Maintenance and Inspection	X			
26.	Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ---Locates are maintained 24/7 and inspected twice per day	X			
27.	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements?	X			

Comments:

Q13 thru Q15 No Damage claims.

OPERATION & MAINTENANCE			S	U	NA	NC
28.	480-75-620	Change in MOP? Changed based on hydrotest? ---No Change			X	
29.	480-75-640	Depth of cover surveys and mitigation ---Depths noted in ROW Inspection	X			
30.	480-75-500	Pipe movement study per API 1117 ---Petrogas does not conduct any movement studies			X	
31.	480-75-300 (3)	Leak detection and alarm records ---Hydrocarbon Detection system tested and calibrated quarterly. 24/7 surveillance on pipeline. Alarm records maintained through Alertus and DCS	X			
32.	480-75-320	Surge analysis done? ---Facility's existing pumps cannot overcome the MOP (250 psig). See Appendix C in Pipeline Manual			X	

CORROSION CONTROL			S	U	NA	NC
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33.	480-75-510	Corrosion remediation within 90 days ---When deficiencies that could adversely affect the safe operation of a pipeline or pipeline facility are found during cathodic protection monitoring, remedial action would be taken as soon as practical, but within 90 days. Located in MIP 501- Cathodic Protection	X			
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Comments:

FIELD REVIEW			S	U	N/A	N/C
34.	480-75-540	Markers at exposed areas	X			
35.	480-75-320	Relief Device set at or below MOP	X			
36.	480-75-300	Leak Detection – 8% in 15 Minutes	X			
37.	480-75-300	Leak detection at flow and no flow conditions	X			
38.	480-75-330	Do Breakout Tanks have independent overfill alarms? ---T1 and T2 have independent overfill alarms. Emerson Raptor (Guided Wave Radar)	X			

Comments:

EXIT INTERVIEW	
Exit interview conducted? Issues addressed:	Date: 7/6/2020

For PHMSA Advisory Bulletins, go to <https://www.phmsa.dot.gov/regulations-fr/notices>