

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	8299 Seaport Standard	Operator(s)	SEAPORT SOUND TERMINAL, LLC (39906)	Plan Submitted	10/14/2021
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2021	Team Members	Anthony Dorrough	All Activity Start	09/27/2021
System Type	HL	Observer(s)	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Deborah Becker, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity End	09/30/2021
Protocol Set ID	WA.HL.2021.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

This inspection was conducted at Seaport Sound Terminal in Tacoma, WA on September 27 and September 28, 2021. The inspection included an inspection of Seaport's operation and maintenance records for the pipeline and breakout tank (Tank 205). Field inspection included rectifier inspections, ROW patrol, breakout tank visual inspection, overfill alarm testing and visual inspection of above ground pipeline. There were no areas of concern or probable violations found as a result of this inspection.

Recommend that during the next standard inspection, commission staff observe CP activities during Seaport's annual CP survey. Seaport brings in CP personnel from Transmontaigne to do CP testing so staff were unable to observe these activities during the inspection.

### Facilities visited and Total AFOD

AFOD: 2 days

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There were no areas of concern or probable violations found as a result of this inspection.

### Primary Operator contacts and/or participants

Ted Lilyblade  
Terminal Manager  
(253) 579-1954

Matthew Kolata  
EH&S Specialist  
(253) 579-1947

### Operator executive contact and mailing address for any official correspondence

Edward Luebke  
4130 E 11th St  
Tacoma, WA 98421

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88920	Seaport Sound Terminal	unit	88920	Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress Abandoned	131	131	131	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.	88920	BO Tank Inspection, Baseline Records (Form 3), Baseline Pipeline Field Inspection (Form 3)	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	R, O	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.	Records	--	09/27/2021	09/30/2021	n/a	all planned questions	all assets	P, R	98	98	98	100.0%
2.	Field	--	09/27/2021	09/30/2021	n/a	all planned questions	all assets	O	33	33	33	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, 133 results)

157 (instead of 133) results are listed due to re-presentation of questions in more than one sub-group.

### CR.CRMRR: Roles and Responsibilities

1. Question Result, ID, References **Sat, CR.CRMRR.PRESSLIMITS.O, 195.446(b)(2)**  
 Question Text *Are controllers aware of the current MOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MOP?*  
 Assets Covered **88920**

### CR.LD: Leak Detection (Non-CPM)

2. Question Result, ID, References **NA, CR.LD.EVAL.R, 195.444(a) (195.444(b), 195.134(a), 195.134(b),)**  
 Question Text *Do records show that the operator evaluated the capability of its leak detection system to protect the public, property, and the environment and modified as necessary?*

Assets Covered 88920  
Result Notes Seaport has a CPM leak detection system

3. Question Result, ID, References NA, CR.LD.LDSYSTEM.R, 195.404(c) (195.134(b), 195.444(b))  
Question Text *Do records demonstrate the operator's leak detection system is performing within the system design requirements?*  
Assets Covered 88920  
Result Notes Seaport has a CPM leak detection system
4. Question Result, ID, References NA, CR.LD.LDTRAINING.R, 195.507(a) (195.507(b))  
Question Text *Do records show that pipeline controllers are trained to recognize leaks using the chosen leak detection method/system?*  
Assets Covered 88920  
Result Notes Seaport has a CPM leak detection system
5. Question Result, ID, References Sat, CR.LD.LDTRAINING.O, 195.505  
Question Text *Are the Pipeline Controllers trained to recognize leaks?*  
Assets Covered 88920
6. Question Result, ID, References Sat, CR.LD.ALARMDISPLAY.O, 195.444(b)  
Question Text *Are the Leak Detection alarms adequate?*  
Assets Covered 88920
7. Question Result, ID, References NA, CR.LD.LDSTEST.R, 195.134(b) (195.444(b))  
Question Text *Have leak detection system testing records and results been retained/available and indicate adequate results?*  
Assets Covered 88920  
Result Notes Seaport has a CPM leak detection system
8. Question Result, ID, References NA, CR.LD.LDSINSTRUMENT.R, 195.444(b) (195.446(j))  
Question Text *Do records indicate the calibration of field instrumentation used in the leak detection system was performed?*  
Assets Covered 88920  
Result Notes Seaport has a CPM leak detection system

## DC.CO: Construction

9. Question Result, ID, References Sat, DC.CO.VALVEPROTECT.O, 195.258(a)  
Question Text *Are valves accessible to authorized employees and protected from damage or tampering?*  
Assets Covered 88920
10. Question Result, ID, References Sat, DC.CO.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))  
Question Text *Are valves located as specified by 195.260?*  
Assets Covered 88920  
Result Notes Valves located at both ends which is 3 miles long
11. Question Result, ID, References Sat, DC.CO.RECORDS.R, 195.266(a) (195.266(b), 195.266(c), 195.266(d), 195.266(e), 195.266(f))  
Question Text *Do records indicate that construction records are being maintained for the life of each pipeline?*  
Assets Covered 88920  
Result Notes Initial construction records available for pipeline and tank 205

## DC.WELDINSP: Construction Weld Inspection

12. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDT.R, 195.234(d) (195.266(a))** (also presented in: TDC.WELDINSP)  
Question Text *Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?*  
Assets Covered **88920**  
Result Notes **No welding has been performed since initial construction**
13. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a))** (also presented in: TDC.WELDINSP)  
Question Text *Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?*  
Assets Covered **88920**  
Result Notes **No welding has been performed since initial construction**
14. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a))** (also presented in: TDC.WELDINSP)  
Question Text *Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?*  
Assets Covered **88920**  
Result Notes **Seaport has not installed used pipe**
15. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a))** (also presented in: TDC.WELDINSP)  
Question Text *Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?*  
Assets Covered **88920**  
Result Notes **No tie-in welds during the life of the pipe**

## DC.WELDERQUAL: Construction Welder Qualification

16. Question Result, ID, References **NA, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME Boiler & Pressure Vessel Code Section IX)** (also presented in: TDC.WELDERQUAL)  
Question Text *Do records indicate that welders are qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?*  
Assets Covered **88920**  
Result Notes **There has been no welding since initial construction**

## DC.WELDPROCEDURE: Construction Welding Procedures

17. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b)** (also presented in: TDC.WELDPROCEDURE)  
Question Text *Do records indicate welding procedures and qualifying tests recorded in detail?*  
Assets Covered **88920**  
Result Notes **Weld procedures available with qualifying tests**

## DC.PT: Pressure Testing

18. Question Result, ID, References **Sat, DC.PT.PRESSTEST.R, 195.310 (195.305(b))**  
Question Text *Are pressure test records available and adequate?*  
Assets Covered **88920**  
Result Notes **Pressure testing records available, reviewed charts from initial construction, tested 615 to 675 psig for 8 hours**
19. Question Result, ID, References **NA, DC.PT.PRESSTEST.O, 195.302(a) (195.304, 195.305(a), 195.305(b), 195.306(a), 195.306(b), 195.306(c), 195.306(d), 195.307(a), 195.307(b), 195.307(c), 195.307(d), 195.307(e), 195.308)**  
Question Text *Is pressure testing being adequately conducted?*

Assets Covered 88920  
Result Notes No pressure testing conducted during the inspection

20. Question Result, ID, References NA, DC.PT.PRESSTESTTIEIN.R, 195.308  
Question Text *Do records indicate pipe associated with tie-ins has been pressure tested?*  
Assets Covered 88920  
Result Notes No tie-ins

## TDC.650REGS: New API 650 Tanks - Part 195 Requirements

21. Question Result, ID, References NA, TDC.650REGS.TANKSPEC.R, 195.132(b)(3) (API Std 650)  
Question Text *Do the design records and drawings indicate new aboveground atmospheric breakout tanks are designed and constructed to the specifications required by 195.132(b)(3)?*  
Assets Covered 88920  
Result Notes Seaport has original records for Tank 205 but no new breakout tanks have been constructed.
22. Question Result, ID, References NA, TDC.650REGS.REPAIRSPEC.R, 195.205(b)(1) (API Std 650, API Std 653)  
Question Text *Do records indicate breakout tanks were repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?*  
Assets Covered 88920  
Result Notes There have been no repairs or reconstruction to the breakout tank
23. Question Result, ID, References NA, TDC.650REGS.CPDESIGN.O, 195.565 (195.563(d), API RP 651, Section 6.3.4, API RP 651, Section 6.3.5, API RP 651, Section 7.2.1)  
Question Text *Do field observations confirm new breakout tanks have cathodic protection installed in accordance with 195.565?*  
Assets Covered 88920  
Result Notes No new breakout tanks

## TDC.WELDPROCEDURE: New Tank Piping - Construction Welding Procedures (Re-Presented)

24. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b) (also presented in: DC.WELDPROCEDURE)  
Question Text *Do records indicate welding procedures and qualifying tests recorded in detail?*  
Assets Covered 88920  
Result Notes Weld procedures available with qualifying tests

## TDC.WELDERQUAL: New Tank Piping - Construction Welder Qualification (Re-Presented)

25. Question Result, ID, References NA, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME Boiler & Pressure Vessel Code Section IX) (also presented in: DC.WELDERQUAL)  
Question Text *Do records indicate that welders are qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?*  
Assets Covered 88920  
Result Notes There has been no welding since initial construction

## TDC.WELDINSPECTION: New Tank Piping - Construction Weld Inspection (Re-Presented)

26. Question Result, ID, References NA, DC.WELDINSPECTION.GIRTHWELDNDT.R, 195.234(d) (195.266(a)) (also presented in: DC.WELDINSPECTION)  
Question Text *Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?*  
Assets Covered 88920  
Result Notes No welding has been performed since initial construction

27. Question Result, ID, **NA, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a))** (also presented in: References **DC.WELDINSP**)  
 Question Text *Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?*  
 Assets Covered **88920**  
 Result Notes **No welding has been performed since initial construction**
28. Question Result, ID, **NA, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a))** (also presented in: DC.WELDINSP)  
 Question Text *Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?*  
 Assets Covered **88920**  
 Result Notes **Seaport has not installed used pipe**
29. Question Result, ID, **NA, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a))** (also presented in: DC.WELDINSP)  
 Question Text *Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?*  
 Assets Covered **88920**  
 Result Notes **No tie-in welds during the life of the pipe**

## EP.ERL: Emergency Response Liquids

30. Question Result, ID, **Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4)** (also presented in: 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 **88920**  
 Result Notes **Emails to FD Station 3 annually and working to establish contact with Station 5 (New FD in Port of Tacoma), FD attends drills, PA material sent to public officials, Matthew Kolata attends LEPC meetings quarterly**
31. Question Result, ID, **Sat, EP.ERL.NOTICES.R, 195.402(a) (195.402(e)(1))**  
 Question Text *Do records indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures?*  
 Assets Covered **88920**  
 Result Notes **Emergency Shutdown on 9/22/21, pipeline automatically shutdown due to high-high alarm, received call from Olympic 6 minutes later**  
  
**No other events have occurred since the last inspection**
32. Question Result, ID, **Sat, EP.ERL.AUTHORITIES.R, 195.402(a) (195.402(e)(7))**  
 Question Text *Do records indicate that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLs)?*  
 Assets Covered **88920**  
 Result Notes **The event on 9/22/21 had no product release so no need to notify fire or police. They did notify the UTC within 24 hours as required by WAC 480-75**
33. Question Result, ID, **NA, EP.ERL.POSTEVNTREVIEW.R, 195.402(a) (195.402(e)(7), 195.402(e)(9))**  
 Question Text *Do records indicate post-accident reviews of employee activities were performed to determine whether the procedures were effective in each emergency and take corrective action where deficiencies are found?*  
 Assets Covered **88920**  
 Result Notes **Seaport has had no accidents**
34. Question Result, ID, **NA, EP.ERL.COMMSYS.R, 195.408(b)**  
 Question Text *Do records indicate emergency communication system(s) use was as required?*

Assets Covered 88920

Result Notes Seaport has had no accidents so there has been no use the emergency communication system. They do test it during drills

## EP.ETR: Emergency Training of Personnel

35. Question Result, ID, References Sat, EP.ETR.TRAINING.R, 195.403(a)

Question Text *Do records indicate the operator provided training to its emergency response personnel as required?*

Assets Covered 88920

Result Notes All operators receive 24 hour HAZWOPER training with annual 8 hour refreshers, Oil handler training approved by Dept of Ecology, Management positions receive FEMA ICS-100 and -200 training, Reviewed HAZWOPER and Oil Handler training records for operators and Mathew Kolata's ICS certificate

36. Question Result, ID, References Sat, EP.ETR.TRAININGREVIEW.R, 195.403(b)

Question Text *Have annual reviews of the emergency response training program been conducted and appropriate changes made as necessary to ensure it is effective?*

Assets Covered 88920

Result Notes Facility Response Plan reviewed annually and changes shared with emergency response personnel

37. Question Result, ID, References Sat, EP.ETR.TRAININGSUPERVISE.R, 195.403(c)

Question Text *Do records indicate verification that supervisors are knowledgeable of emergency response procedures for which they are responsible?*

Assets Covered 88920

Result Notes Supervisors take HAZWOPER training (24 hour and 8 hour refresher), oil handlers training, ICS training and participate in drills

38. Question Result, ID, References Sat, EP.ETR.TRAININGSUPERVISE.O, 195.403(c)

Question Text *Do emergency response supervisors demonstrate adequate skills and knowledge?*

Assets Covered 88920

Result Notes Supervisors were competent and knowledgeable of emergency response procedures

## FS.TSAPIINSPECT: Tanks and Storage - Inspection

39. Question Result, ID, References NA, FS.TSAPIINSPECT.BOINSPECTION.R, 195.404(c)(3) (195.432(a))

Question Text *Do records document that breakout tanks that are not steel atmospheric or low pressure tanks or HVL steel tanks built according to API 2510 have been inspected at the proper interval and that deficiencies found during inspections have been corrected?*

Assets Covered 88920

Result Notes Seaport has no API 2510 tanks

40. Question Result, ID, References Sat, FS.TSAPIINSPECT.BOINSRVCINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received routine in-service inspections at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered 88920

Result Notes 5-year in service inspection performed March 2, 2018 by Mistras. There were no significant findings or recommendations

41. Question Result, ID, References Sat, FS.TSAPIINSPECT.BOEXTINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received external inspections at the required intervals and that deficiencies documented during inspections have been corrected within a reasonable time frame?*

Assets Covered 88920

Result Notes 5-year in service inspection performed March 2, 2018 by Mistras. There were no significant findings or recommendations. Monthly visual and alarm inspections checked monthly. Reviewed records for 2019, 2020 and 2021

42. Question Result, ID, References Sat, FS.TSAPIINSPECT.BOEXTUTINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received ultrasonic thickness inspections at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered 88920

Result Notes 5-year in service inspection performed March 2, 2018 by Mistras. UT was performed during this inspection, No deficiencies

43. Question Result, ID, References NA, FS.TSAPIINSPECT.BOINTINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received formal internal inspections at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered 88920

Result Notes Internal inspection has not been performed. The 10-year in-service inspection is due next year

44. Question Result, ID, References NA, FS.TSAPIINSPECT.BOEXTINSPAPI2510.R, 195.404(c)(3) (195.432(c))

Question Text *Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 have received visual external inspections at the required intervals and that deficiencies found have been corrected?*

Assets Covered 88920

Result Notes Seaport has no API 2510 breakout tanks

45. Question Result, ID, References NA, FS.TSAPIINSPECT.BOINTINSPAPI2510.R, 195.404(c)(3) (195.432(c))

Question Text *Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 received internal inspections at the required intervals and that deficiencies found have been corrected?*

Assets Covered 88920

Result Notes Seaport has no API 2510 breakout tanks

46. Question Result, ID, References Sat, FS.TS.BOINSPECTION.O, 195.432(a) (195.432(b), 195.432(c), 195.401(b)) (also presented in: FS.TS)

Question Text *Is the condition of steel atmospheric or low pressure tanks acceptable?*

Assets Covered 88920

Result Notes No visible deformations, cracks, dents, etc in the tank. No settlement or indications of leaks

## FS.FG: Facilities General

47. Question Result, ID, References Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: PD.SN)

Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*

Assets Covered 88920

Result Notes All gates and valves were locked

48. Question Result, ID, References Sat, FS.FG.IGNITION.O, 195.438 (also presented in: PD.SN)

Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*

Assets Covered 88920

49. Question Result, ID, References Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: PD.SN)

Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*

Assets Covered 88920



50. Question Result, ID, References **Sat, FS.FG.FIREPROT.R, 195.404(c)(3) (195.430(a), 195.430(b), 195.430(c))**  
 Question Text *Are records of inspections of firefighting equipment adequate?*  
 Assets Covered **88920**  
 Result Notes **Foam system inspected every 2 years, fire extinguishers inspected annually and updated tag. Seaport personnel do monthly checks on fire extinguishers at breakout tank and pump station**  
  
**Reviewed records for 2019, 2020 and 2021**
51. Question Result, ID, References **Sat, FS.FG.FIREPROT.O, 195.430(a) (195.430(b), 195.430(c), 195.262(e))**  
 Question Text *Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly?*  
 Assets Covered **88920**
52. Question Result, ID, References **NA, FS.FG.PSFIREPROTPWR.O, 195.262(e)**  
 Question Text *Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps?*  
 Assets Covered **88920**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## FS.PS: Pump Stations

53. Question Result, ID, References **Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a))** (also presented in: MO.LMOPP)  
 Question Text *Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?*  
 Assets Covered **88920**  
 Result Notes **PRV and thermal reliefs switched out annually and sent to Bay Valve Service Inc to be bench tested. Reviewed records for 2018, 2019 and 2020. 2021 is about to be sent for testing**  
  
**Pressure transmitters tested annually NTE 15 month. Reviewed records for 2019, 2020 and 2021**
54. Question Result, ID, References **NA, MO.LMOPP.PRESSREGTESTHVL.R, 195.404(c) (195.428(a))** (also presented in: MO.LMOPP)  
 Question Text *Do records indicate inspection and testing of each overpressure safety device on HVL pipelines at intervals not to exceed 7.5 months, but at least twice each calendar year?*  
 Assets Covered **88920**  
 Result Notes **Seaport does not transport HVLs**
55. Question Result, ID, References **NA, FS.PS.VENTILATION.O, 195.262(a)**  
 Question Text *Has adequate ventilation been provided at pump station buildings?*  
 Assets Covered **88920**  
 Result Notes **The pump station has no buildings**
56. Question Result, ID, References **NA, FS.PS.VAPORALARM.O, 195.262(a)**  
 Question Text *Have warning devices that warn of the presence of hazardous vapors been installed at pump station buildings?*  
 Assets Covered **88920**  
 Result Notes **The pump station has no buildings**
57. Question Result, ID, References **Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a)** (also presented in: MO.LMOPP)  
 Question Text *Are inspections of overpressure safety devices adequate (including HVL lines)?*  
 Assets Covered **88920**  
 Result Notes **Seaport was operating during the field inspection so no devices were tested**

58. Question Result, ID, References **Sat, FS.PS.PSESD.O, 195.262(b)**  
 Question Text *Has a device for activating emergency shutdown of the pump station been installed?*  
 Assets Covered **88920**  
 Result Notes **Emergency shutdowns were visible at the pump station**
59. Question Result, ID, References **Sat, FS.PS.PSAUXPWR.O, 195.262(b)**  
 Question Text *If power is needed to actuate safety devices, has an auxiliary power supply been provided?*  
 Assets Covered **88920**  
 Result Notes **Battery backup at pump station**
60. Question Result, ID, References **Sat, FS.PS.PSLOCATION.O, 195.262(d)**  
 Question Text *Has on-shore pumping equipment been installed on property under the control of the operator and is that equipment at least 50 feet from the boundary of that property?*  
 Assets Covered **88920**
61. Question Result, ID, References **Sat, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426** (also presented in: MO.LMOPP)  
 Question Text *Are launchers and receivers equipped with relief devices?*  
 Assets Covered **88920**

## FS.TS: Tanks and Storage

62. Question Result, ID, References **NA, FS.TS.PRVTSTHVLBO.R, 195.404(c)(3) (195.428(b))**  
 Question Text *Do records document testing and inspection of relief valves on HVL pressure breakout tanks at the required frequency?*  
 Assets Covered **88920**  
 Result Notes **Seaport does not transport HVLs**
63. Question Result, ID, References **Sat, FS.TS.OVERFILLBO.R, 195.404(c)(3) (195.428(a), 195.428(c), 195.428(d))**  
 Question Text *Do records document the inspection and testing of overfill protection devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*  
 Assets Covered **88920**  
 Result Notes **Tested monthly, with BO Tank inspection. Reviewed records for 2019, 2020 and 2021**
64. Question Result, ID, References **Sat, FS.TS.OVERFILLBO.O, 195.428(c)**  
 Question Text *Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*  
 Assets Covered **88920**  
 Result Notes **Tested overfill device on the breakout tank, received confirmation from the control room and from Olympic that the alarm was received**
65. Question Result, ID, References **Sat, FS.TS.BOINSPECTION.O, 195.432(a) (195.432(b), 195.432(c), 195.401(b))** (also presented in: FS.TSAPIINSPECT)  
 Question Text *Is the condition of steel atmospheric or low pressure tanks acceptable?*  
 Assets Covered **88920**  
 Result Notes **No visible deformations, cracks, dents, etc in the tank. No settlement or indications of leaks**
66. Question Result, ID, References **Sat, FS.TS.IGNITIONBO.R, 195.404(c) (195.405(a))**  
 Question Text *Do records indicate protection against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities of aboveground breakout tanks?*  
 Assets Covered **88920**

Result Notes Tank 205 is grounded, operators inspect grounding rods during monthly inspections. When gauging the tank, personnel must wait 30 minutes for static to dissipate, ground tape reel, etc.

67. Question Result, ID, References NA, FS.TS.FLOATINGROOF.R, 195.404(c) (195.405(b))

Question Text Do records indicate access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance, or repair activities of in-service tanks is performed consistent with API Publication 2026?

Assets Covered 88920

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

68. Question Result, ID, References Sat, FS.TS.IMPOUNDBO.R, 195.404(c) (195.264(b))

Question Text If a breakout tank first went into service after October 2, 2000 do records indicate it has an adequate impoundment?

Assets Covered 88920

Result Notes Impoundment effective volume is 3,774,000 gallons and Tank 205 has a volume of 197,970 gallons

69. Question Result, ID, References Sat, FS.TS.IMPOUNDBO.O, 195.264(b)

Question Text If a breakout tank first went into service after October 2, 2000 does it have an adequate impoundment?

Assets Covered 88920

70. Question Result, ID, References Sat, FS.TS.VENTBO.R, 195.404(c) (195.264(d))

Question Text Do records indicate that normal/emergency relief venting and pressure/vacuum-relieving devices installed on aboveground breakout tanks after October 2, 2000 are adequate?

Assets Covered 88920

Result Notes Internal floating roof tank with vent at the top, no risk of overpressure or vacuum

71. Question Result, ID, References NA, FS.TS.PRESSTESTBO.R, 195.310(a) (195.310(b), 195.307)

Question Text Have aboveground breakout tanks been pressure tested to their corresponding API or ASME Standard or Specification and do pressure test records contain the required information?

Assets Covered 88920

Result Notes No hydrostatic testing done since the last inspection. Tank 205 was tested after initial construction

## FS.VA: Valves

72. Question Result, ID, References Sat, MO.LM.VALVEMAIN.T.R, 195.404(c) (195.420(a), 195.420(b)) (also presented in: MO.LM)

Question Text Do records indicate each mainline valve was inspected as required?

Assets Covered 88920

Result Notes Performed twice per year, reviewed records for 2019, 2020 and 2021

73. Question Result, ID, References Sat, MO.LM.VALVEMAIN.O, 195.420(a) (195.420(c)) (also presented in: MO.LM)

Question Text Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?

Assets Covered 88920

## MO.LO: Liquid Pipeline Operations

74. Question Result, ID, References Sat, MO.LO.OMMANUALREVIEW.R, 195.402(a)

Question Text Do records indicate annual reviews of the written procedures in the manual were conducted as required?

Assets Covered 88920

75. Question Result, ID, References Sat, MO.LO.OMHISTORY.R, 195.404(a) (195.404(c), 195.9, 195.402(c)(1))

Question Text *Do records indicate current maps and records of the pipeline system are maintained and made available as necessary?*

Assets Covered 88920

Result Notes NPMS submissions annually, the pipeline has not had any changes since initial construction, maps are available to operator personnel

76. Question Result, ID, References Sat, MO.LO.OMEFFECTREVIEW.R, 195.402(a) (195.402(c)(13), 195.404(a))

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

Assets Covered 88920

Result Notes Annual Operator Performance reviews completed by Rob Cohee, Pipeline supervisor

## MO.LOMOP: Liquid Pipeline MOP

77. Question Result, ID, References Sat, MO.LOMOP.MOPDETERMINE.R, 195.402(c)(3) (195.406(a), 195.406(b), 195.302(b), 195.302(c))

Question Text *Do records indicate the maximum operating pressure was established in accordance with 195.406?*

Assets Covered 88920

Result Notes MOP of 540 psig established by pressure test

## MO.LMOPP: Liquid Pipeline Overpressure Protection

78. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: FS.PS)

Question Text *Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?*

Assets Covered 88920

Result Notes PRV and thermal reliefs switched out annually and sent to Bay Valve Service Inc to be bench tested. Reviewed records for 2018, 2019 and 2020. 2021 is about to be sent for testing

Pressure transmitters tested annually NTE 15 month. Reviewed records for 2019, 2020 and 2021

79. Question Result, ID, References NA, MO.LMOPP.PRESSREGTESTHVL.R, 195.404(c) (195.428(a)) (also presented in: FS.PS)

Question Text *Do records indicate inspection and testing of each overpressure safety device on HVL pipelines at intervals not to exceed 7.5 months, but at least twice each calendar year?*

Assets Covered 88920

Result Notes Seaport does not transport HVLs

80. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: FS.PS)

Question Text *Are inspections of overpressure safety devices adequate (including HVL lines)?*

Assets Covered 88920

Result Notes Seaport was operating during the field inspection so no devices were tested

81. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426 (also presented in: FS.PS)

Question Text *Are launchers and receivers equipped with relief devices?*

Assets Covered 88920

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

82. Question Result, ID, References Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: PD.RW)

Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*

Assets Covered 88920

Result Notes Performed weekly, reviewed records from 2019, 2020 and 2021

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

83. Question Result, ID, References **Sat, MO.ABNORMAL.ABNORMAL.R, 195.404(b) (195.402(d)(1))**  
Question Text *Do records indicate operator's personnel responded to indications of abnormal operations as required by the written procedures?*  
Assets Covered **88920**  
Result Notes **Unintended valve closure in September 2021, at time of inspection Seaport is still performing review of personnel activities and possible procedure changes**  
  
**Emergency shutdown activated and Seaport made required notification and conducted physical inspection of boost station and piping**

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

84. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 195.412(a)** (also presented in: PD.RW)  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered **88920**  
Result Notes **The pipeline is 3 miles long and is driven and walked for patrolling. Patrolled weekly**

## MO.LM: Liquid Pipeline Maintenance

85. Question Result, ID, References **Sat, MO.LM.VALVEMAIN.T.R, 195.404(c) (195.420(a), 195.420(b))** (also presented in: FS.VA)  
Question Text *Do records indicate each mainline valve was inspected as required?*  
Assets Covered **88920**  
Result Notes **Performed twice per year, reviewed records for 2019, 2020 and 2021**

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

86. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c))** (also presented in: PD.RW)  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered **88920**  
Result Notes **Markers visible along entire ROW**

## MO.LM: Liquid Pipeline Maintenance

87. Question Result, ID, References **Sat, MO.LM.VALVEMAIN.T.O, 195.420(a) (195.420(c))** (also presented in: FS.VA)  
Question Text *Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?*  
Assets Covered **88920**

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

88. Question Result, ID, References **Sat, MO.ABNORMAL.ABNORMALREVIEW.R, 195.404(b) (195.402(d)(5))**  
Question Text *Do records indicate post-event reviews of actions taken by operator personnel to determine the effectiveness of the abnormal operation procedures and whether corrective actions were taken where deficiencies were found?*  
Assets Covered **88920**  
Result Notes **Unintended valve closure in September 2021, at time of inspection Seaport is still performing review of personnel activities and possible procedure changes**

## MO.LC: Liquid Conversion

89. Question Result, ID, References **NA, MO.LC.CONVERSION.R, 195.5(c) (195.5(a))**  
Question Text *Do records indicate the process was followed for converting any pipelines into Part 195 service?*  
Assets Covered **88920**  
Result Notes **No lines have been converted to liquid service**

## MO.EW: Extreme Weather

90. Question Result, ID, References **NA, MO.EW.EXTWEATHERINSPIMPL.R, 195.404(c) (195.414(a), 195.414(b), 195.414(c), 195.414(d))**  
Question Text *Do records indicate the operator conducted the required inspection following and extreme weather or natural disaster event?*  
Assets Covered **88920**  
Result Notes **There have been no extreme weather events since the last inspection**
91. Question Result, ID, References **NA, MO.EW.EXTWEATHERINSPSAFE.O, 195.414(d)**  
Question Text *Are the pipeline facilities that were affected by an extreme weather or natural disaster event back to a safe operating condition?*  
Assets Covered **88920**  
Result Notes **No extreme weather events have occurred**

## PD.DP: Damage Prevention

92. Question Result, ID, References **Sat, PD.DP.PROGRAM.R, 195.442(a)**  
Question Text *Do records indicate the damage prevention program is being carried out as written?*  
Assets Covered **88920**  
Result Notes **Reviewed a sample of dig tickets from 2021, no tickets exceed 2 day requirements**

## PD.PA: Public Awareness

93. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(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 **88920**  
Result Notes **PA Plan describes how Paradigm identifies stakeholder, Seaport has excel file available with all stake holders listed**
94. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 195.440(d) (195.440(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 hazardous liquid or carbon dioxide pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; and (5) Procedures to report such an event?*  
Assets Covered **88920**  
Result Notes **Reviewed PA brochure, all required information was included**
95. Question Result, ID, References **Sat, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f))**  
Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?*  
Assets Covered **88920**  
Result Notes **USPS transaction receipt from 10/30/2020**

96. Question Result, ID, References **Sat, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1)**  
 Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1?*  
 Assets Covered **88920**
97. Question Result, ID, References **Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also presented in: EP.ERL)**  
 Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*  
 Assets Covered **88920**  
 Result Notes **Emails to FD Station 3 annually and working to establish contact with Station 5 (New FD in Port of Tacoma), FD attends drills, PA material sent to public officials, Matthew Kolata attends LEPC meetings quarterly**
98. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 195.440(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 **88920**  
 Result Notes **PA brochure in english and spanish**
99. Question Result, ID, References **Sat, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**  
 Question Text *Has an audit or review of the public awareness program implementation been performed annually since the program was developed?*  
 Assets Covered **88920**  
 Result Notes **Completed 5/19/21**
100. Question Result, ID, References **Sat, PD.PA.AUDITMETHODS.R, 195.440(c) (195.440(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 the public awareness program implementation?*  
 Assets Covered **88920**  
 Result Notes **Internal assessment being completed by Seaport**
101. Question Result, ID, References **Sat, PD.PA.PROGRAMIMPROVE.R, 195.440(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 **88920**  
 Result Notes **No changes made based on audit at this time**
102. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 Sections 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 **88920**  
 Result Notes **Paradigm completed effectiveness for initial mailing**
103. Question Result, ID, References **Sat, PD.PA.MEASUREOUTREACH.R, 195.440(c) (API RP 1162 Section 8.4.1)**  
 Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*  
 Assets Covered **88920**  
 Result Notes **Paradigm completed effectiveness for initial mailing**
104. Question Result, ID, References **Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(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 **88920**

Result Notes Paradigm completed effectiveness for initial mailing

105. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 195.440(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 88920  
Result Notes Effectiveness review included questions regarding response actions and how to prevent incidents
106. Question Result, ID, References NA, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 Section 8.4.4)  
Question Text *Did the operator attempt to measure bottom-line results of the program 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 88920  
Result Notes Seaport has had no third part incidents or near misses
107. Question Result, ID, References Sat, PD.PA.CHANGES.R, 195.440(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 88920  
Result Notes No program changes have been identified yet

## PD.RW: ROW Markers, Patrols, Monitoring

108. Question Result, ID, References Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: MO.RW)  
Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*  
Assets Covered 88920  
Result Notes Performed weekly, reviewed records from 2019, 2020 and 2021
109. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 195.412(a) (also presented in: MO.RW)  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered 88920  
Result Notes The pipeline is 3 miles long and is driven and walked for patrolling. Patrolled weekly
110. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: MO.RW)  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered 88920  
Result Notes Markers visible along entire ROW

## PD.SN: Facilities Signage and Security

111. Question Result, ID, References Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: FS.FG)  
Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*  
Assets Covered 88920  
Result Notes All gates and valves were locked
112. Question Result, ID, References Sat, FS.FG.IGNITION.O, 195.438 (also presented in: FS.FG)  
Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*  
Assets Covered 88920
113. Question Result, ID, References Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: FS.FG)



Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*  
Assets Covered 88920

## RPT.RR: Regulatory Reporting (Traditional)

114. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 195.49 (195.13(b), 195.15(b))

Question Text *Do the records indicate that complete and accurate Annual Reports have been submitted?*  
Assets Covered 88920

Result Notes Reviewed annual reports for 2018, 2019 and 2020. All reports submitted by June 15th

115. Question Result, ID, References NA, RPT.RR.GRAVITY.R, 195.49 (195.13(b))

Question Text *Do Annual Reports include applicable information for gravity lines?*  
Assets Covered 88920

Result Notes Seaport has no gravity lines

116. Question Result, ID, References NA, RPT.RR.REGONLYGATHER.R, 195.49 (195.15(b))

Question Text *Do Annual Reports include applicable information for regulated-only gathering lines?*  
Assets Covered 88920

Result Notes Seaport has no gathering lines

117. Question Result, ID, References NA, RPT.RR.ACCIDENTREPORT.R, 195.54(a) (195.50(a), 195.50(b), 195.50(c), 195.50(d), 195.50(e), 195.13(b), 195.15(b))

Question Text *Do records indicate the original accident reports were filed as required?*  
Assets Covered 88920

Result Notes Seaport has had no accidents to report

118. Question Result, ID, References NA, RPT.RR.ACCIDENTREPORTSUPP.R, 195.54(b) (195.13(b), 195.15(b))

Question Text *Do records indicate accurate supplemental accident reports were filed and within the required timeframe?*  
Assets Covered 88920

Result Notes Seaport has had no accidents to report

119. Question Result, ID, References NA, RPT.RR.IMMEDREPORT.R, 195.52(a) (195.52(b), 195.52(c), 195.52(d))

Question Text *Do records indicate immediate notifications of accidents were made in accordance with 195.52?*  
Assets Covered 88920

Result Notes Seaport has had no accidents to report

120. Question Result, ID, References NA, RPT.RR.SRCR.R, 195.56(a) (195.55(a), 195.55(b), 195.56(b), 195.13(b), 195.15(b))

Question Text *Do records indicate safety-related condition reports were filed as required?*  
Assets Covered 88920

Result Notes Seaport has had no safety related conditions to report

121. Question Result, ID, References Sat, RPT.RR.NPMSANNUAL.R, 195.61(a) (195.61(b))

Question Text *Do records indicate: NPMS submissions are completed each year, on or before June 15, representing all in service, idle and retired assets as of December 31 of the previous year, and if no modifications occurred an email to that effect was submitted?*

Assets Covered 88920

Result Notes NPMS submissions completed by June 15th. Reviewed records for 2019, 2020 and 2021

## TD.ATM: Atmospheric Corrosion

122. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 195.589(c) (195.583(a), 195.583(b), 195.583(c))

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

Assets Covered 88920

Result Notes Above ground piping is coated and is inspected every 3 years NTE 39 months. One coating issue found in 2018 and repaired by contractor

Pipeline recoated by MESA. Reviewed inspection and recoat records

123. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 195.583(c) (195.581(a))

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

Assets Covered 88920

## TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection

124. Question Result, ID, References Sat, TD.CPBO.BO.R, 195.589(c) (195.573(d))

Question Text *Do records adequately document when and how cathodic protection systems were inspected on breakout tanks?*

Assets Covered 88920

Result Notes NACE SP0193

Completed 4/12/2019, 6/10/2020 and 8/3/2021

125. Question Result, ID, References NA, TD.CPBO.BO.O, 195.573(d)

Question Text *Are cathodic protection monitoring tests performed correctly on breakout tank bottoms?*

Assets Covered 88920

Result Notes Seaport did not have a CP Tech onsite to perform CP testing. CP testing is performed by TransMontaigne

126. Question Result, ID, References Sat, TD.CPBO.DEFICIENCYBO.R, 195.589(c) (195.573(e))

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in breakout tank corrosion control?*

Assets Covered 88920

Result Notes Supplemental ground bed installed during initial CP commissioning in 2013 to ensure adequate protection is in place

One reading low in 2020, new reading taken to confirm condition. No issue found after follow-up

## TD.CP: External Corrosion - Cathodic Protection

127. Question Result, ID, References Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b)) (also presented in: TQ.QU)

Question Text *Is qualification of supervisors in corrosion control procedures documented?*

Assets Covered 88920

Result Notes Received OQs for Benjamin Morgan (TransMontaigne), all CP tasks are good until 2024

Benjamin Morgan

NACE Corrosion Technologist

NACE Coating Inspector Level 2

NACE CP Technician - CP2

Expire 10/31/2021

128. Question Result, ID, References Sat, TD.CP.NEWOPERATE.R, 195.589(c) (195.563(a))

Question Text *Do records document when cathodic protection was operational on constructed, relocated, replaced, converted to service, or otherwise changed pipelines?*

Assets Covered 88920

Result Notes CP system online in 2013

129. Question Result, ID, References NA, TD.CP.UNPROTECT.R, 195.589(c) (195.573(b)(1), 195.573(b)(2))

Question Text *Do records document the adequate re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?*

Assets Covered 88920

Result Notes Seaport's pipeline is cathodically protected

130. Question Result, ID, References Sat, TD.CP.ISOLATE.R, 195.589(c) (195.575(a), 195.575(b), 195.575(c), 195.575(d))

Question Text *Do records document adequate 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 88920

Result Notes Completed 4/12/2019, 6/10/2020 and 8/3/2021

131. Question Result, ID, References NA, TD.CP.ISOLATE.O, 195.575(a) (195.575(b), 195.575(c), 195.575(d))

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 88920

Result Notes Seaport did not have a CP Tech onsite to perform CP testing. CP testing is performed by TransMontaigne

132. Question Result, ID, References Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 88920

Result Notes Low read last year and Transmontaigne sent a CP tech to followup, Followup readings were good

133. Question Result, ID, References Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CPMONITOR)

Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*

Assets Covered 88920

Result Notes Tank Farm map showed location of rectifiers and anode beds

## TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

134. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADMAINT.R, 195.589(c) (195.567(c))

Question Text *Do records document that CP test lead wires have been properly maintained?*

Assets Covered 88920

Result Notes Checked during annual CP surveys

135. Question Result, ID, References NA, TD.CPMONITOR.MONITOR.O, 195.571

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

Assets Covered 88920

Result Notes Seaport did not have a CP Tech onsite to perform CP testing. CP testing is performed by TransMontaigne

136. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 195.589(c) (195.573(a)(1))

Question Text *Do records adequately document required tests have been done on pipe that is cathodically protected?*

Assets Covered 88920

Result Notes Completed 4/12/2019, 6/10/2020 and 8/3/2021

137. Question Result, ID, References **NA, TD.CPMONITOR.CIS.R, 195.589(c) (195.573(a)(2))**  
Question Text *Do records document, when circumstances dictated a need for close interval surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys?*  
Assets Covered **88920**  
Result Notes **CIS has not been performed**
138. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.R, 195.589(c) (195.573(c))**  
Question Text *Do records document adequate electrical checks of rectifiers, interference bonds, diodes, and reverse current switches and at the required intervals?*  
Assets Covered **88920**  
Result Notes **Monthly Inspections performed by Seaport. Reviewed records for 2019, 2020 and 2021**
139. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.O, 195.573(c)**  
Question Text *Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*  
Assets Covered **88920**  
Result Notes **Rectifier #2**  
  
**27.3 V, 50 A:50 mV shunt factor, 7.5 mV across the shunt, 7.5 A**  
  
**Rectifier #3**  
  
**22.94 V, 20 A:50 mV shunt factor, 2.6 mV across shunt, 1.04 A**  
  
**Condition of rectifiers looked good**
140. Question Result, ID, References **NA, TD.CPMONITOR.INTFRCURRENT.R, 195.589(c) (195.577(a))**  
Question Text *Do records document that the operator has an effective program in place to minimize the detrimental effects of interference currents on their pipeline system, and is minimizing detrimental effects of interference currents from their CP systems on other underground metallic structures?*  
Assets Covered **88920**  
Result Notes **In 2014 Targa identified AC interference as a low risk due to limited exposure to high voltage power lines and other sources. Same assessment made in 2017**
141. Question Result, ID, References **Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED)**  
Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*  
Assets Covered **88920**  
Result Notes **Low read last year and Transmontaigne sent a CP tech to followup, Followup readings were good**
142. Question Result, ID, References **Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CP)**  
Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*  
Assets Covered **88920**  
Result Notes **Tank Farm map showed location of rectifiers and anode beds**

## **TD.COAT: External Corrosion - Coatings**

143. Question Result, ID, References **NA, TD.COAT.NEWPIPE.R, 195.589(c) (195.557(a), 195.559, 195.401(c))**  
Question Text *Do records document that coatings for pipelines constructed, relocated, replaced, or otherwise changed meet the requirements of 195.559?*

Assets Covered 88920

Result Notes There has been no new buried pipe installed since the last inspection

144. Question Result, ID, References NA, TD.COAT.CONVERTPIPE.R, 195.589(c) (195.557(b), 195.559)

Question Text *Do records document that pipelines that have been converted to liquid service and were constructed after the applicable date in 195.401(c) have external coating?*

Assets Covered 88920

Result Notes Seaport has no pipelines converted to hazardous liquid service

145. Question Result, ID, References NA, TD.COAT.COATAPPLY.O, 195.561(a) (195.561(b), 195.559(b), 195.252(b))

Question Text *Is protective coating adequately applied?*

Assets Covered 88920

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

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

146. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.R, 195.589(c) (195.569)

Question Text *Do records document that exposed buried piping was adequately examined for corrosion and deteriorated coating?*

Assets Covered 88920

Result Notes The pipeline has not been exposed since original construction

147. Question Result, ID, References NA, TD.CPEXPOSED.EXTCORRODEREPAIR.R, 195.589(c) (195.585(a), 195.585(b))

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 88920

Result Notes No pipe has been found to be externally corroded requiring repair

148. Question Result, ID, References Sat, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR)

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 88920

Result Notes Low read last year and Transmontaigne sent a CP tech to followup, Followup readings were good

## TD.ICP: Internal Corrosion - Preventive Measures

149. Question Result, ID, References NA, TD.ICP.INVESTREMEDIATION.R, 195.589(c) (195.579(a))

Question Text *Do records document investigation and remediation of the corrosive effects of hazardous liquids or carbon dioxide being transported?*

Assets Covered 88920

Result Notes Seaport has had no indications of corrosive products affecting the pipeline

150. Question Result, ID, References NA, TD.ICP.INHIBITOR.R, 195.589(c) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text *Do records document that corrosion inhibitors have been used in sufficient quantity?*

Assets Covered 88920

Result Notes Seaport has had no indications of corrosive products affecting the pipeline

151. Question Result, ID, References NA, TD.ICP.EXAMINE.R, 195.589(c) (195.579(c), 195.579(a))

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered 88920

Result Notes No pipe has been removed since initial construction

152. Question Result, ID, References **Sat, TD.ICP.BOLINING.R, 195.589(c) (195.579(d))**  
Question Text *Do records document the adequate installation of breakout tank bottom linings?*  
Assets Covered **88920**  
Result Notes **Reviewed initial construction records which indicated that the breakout tank contains a bottom lining. Expresscote HCR-FF (B62-250) @ 20.0-30.0 mil dft**

## **TQ.OQ: Operator Qualification**

153. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.R, 195.507(a) (195.507(b))**  
Question Text *Are adequate records containing the required elements maintained for contractor personnel?*  
Assets Covered **88920**  
Result Notes **Scott Corfman and Charles Poteet from MESA Products for CP testing  
Measuring Structure-to-soil potential completed 7/16/21**  
  
**Recon for Line Locates, Reviewed OQ Program  
Sean Franck completed 2/5/2021**

154. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 195.507(a) (195.507(b))**  
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 **88920**  
Result Notes **Ted Lilyblade  
CP testing due 9/26/22**  
  
**Reviewed a sampling of OQs for Testing overfill devices and visual tank inspection**

## **TQ.QU: Qualification of Personnel - Specific Requirements**

155. Question Result, ID, References **Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b))** (also presented in: TD.CP)  
Question Text *Is qualification of supervisors in corrosion control procedures documented?*  
Assets Covered **88920**  
Result Notes **Received OQs for Benjamin Morgan (TransMontaigne), all CP tasks are good until 2024**  
  
**Benjamin Morgan**  
  
**NACE Corrosion Technologist**  
  
**NACE Coating Inspector Level 2**  
  
**NACE CP Technician - CP2**  
  
**Expire 10/31/2021**

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

156. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTORQUAL.R, 195.204**  
Question Text *Do records indicate adequate qualification documentation for personnel who conduct pipe or pipeline system construction inspections? (TQ.QUOMCONST.INSPECTORQUAL.R) (detail)*  
Assets Covered **88920**  
Result Notes **No construction has been performed since the last UTC inspection**

## TQ.TROMCONST: Training of Personnel - O and M Construction

157. Question Result, ID, NA, TQ.TROMCONST.NDT.R, 195.234(b)(2)  
References

Question Text *Is training for personnel, who perform nondestructive testing of welds, documented and demonstrated?*

Assets Covered 88920

Result Notes No NDT has been performed since the last inspection

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*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.

# G2 - HL Records & Field 8299

UTC Standard Inspection Report  
Intrastate Hazardous Liquid  
FORM G2: State-Specific Requirements

## Inspector and Operator Information

Inspection Link 8299	Inspector - Lead Norwood, Derek	Inspector - Assist
Operator Seaport Sound Terminal	Unit Seaport Sound Terminal	Records Location - City & State Tacoma, WA
Inspection Start Date 09-27-2021	Inspection Exit Interview Date 09-28-2021	Engineer Submit Date 10-14-2021

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

### Inspection Scope and Summary

This inspection was conducted at Seaport Sound Terminal in Tacoma, WA on September 27 and September 28, 2021. The inspection included an inspection of Seaport's operation and maintenance records for the pipeline and breakout tank (Tank 205). Field inspection included rectifier inspections, ROW patrol, breakout tank visual inspection, overfill alarm testing and visual inspection of above ground pipeline. There were no areas of concern or probable violations found as a result of this inspection.

Recommend that during the next standard inspection, commission staff observe CP activities during Seaport's annual CP survey. Seaport brings in CP personnel from Transmontaigne to do CP testing so staff were unable to observe these activities during the inspection.

### Facilities visited and Total AFOD

AFOD: 2 days

### Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no areas of concern or probable violations found as a result of this inspection.

### Primary Operator contacts and/or participants

Ted Lilyblade  
Terminal Manager  
(253) 579-1954

Matthew Kolata  
EH&S Specialist  
(253) 579-1947

### Operator executive contact and mailing address for any official correspondence

Edward Luebke  
4130 E 11th St  
Tacoma, WA 98421

## Instructions and Ratings Definitions

### INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

N/A- Not Applicable (does not apply in this inspection)

N/C - Not Checked/Evaluated (was not inspected during this inspection)

### INSPECTION RESULTS

Unsatisfactory Responses

0

Area of Concern Responses

0

Not Applicable Responses

15

Not Checked / Evaluated Responses

0

Unsatisfactory List

Area of Concern List

Not Applicable List

4,5,6,9,10,11,18,23,24,25,26,27,31,32,33,

Not Checked / Evaluated List



**\*\*If an item is marked Unsat, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the "RECORDS: REQUIRED COMMENTS" section.**

## RECORDS REVIEW

### MAPPING RECORDS

#### Question 1

Has the operator provided accurate maps (or updates) of pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

**Q1 Reference**

RCW 81.88.080

**Q1 Result**

Satisfactory

**Q1 Notes**

Pipeline location data available in UTC GIS

#### Question 2

THIS QUESTION EXISTS IN IA AS RPT.RR.NPMSANNUAL.R Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes gathering lines) occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

**Q2 Reference**

WAC 480-75-600

**Q2 Notes**

NPMS submissions completed by June 15th. Reviewed records for 2019, 2020 and 2021

#### Question 3

Do records indicate that the operator prepares, maintains, and provides to the commission upon request copies of maps, drawings, and records that pertain to their system? Are these documents in sufficient scale and detail to show size and type of material of all facilities?

**Q3 Reference**

WAC 480-75-600

**Q3 Notes**

Maps and drawing are available and were reviewed during initial construction. All records requested have been provided

## REPORTING RECORDS

#### Question 4

Are telephonic reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 made within two hours for events which result 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.

**Q4 Reference**

WAC 480-75-630(1)

**Q4 Result**

Not Applicable

**Q4 Notes**

Seaport has had no incidents requiring notification within two hours

#### Question 5

THIS QUESTION EXISTS IN IA AS RPT.RR.CONSTRUCTIONREPORT.R Has the operator reported all construction of new pipelines intended to operate at 20% SMYS or greater) at least 45 days prior to construction? This report must include the items specified in 480-75-610 (1) (a-h) For new construction operating below 20% SMYS, does the company submit written notice of proposed construction that includes project description and timeline? (NOTE: items a-h not required if operating under 20%SMYS)

**Q5 Reference**

WAC 480-75-610

**Q5 Result**

Not Applicable

**Q5 Notes**

Seaport operates below 20% SMYS and has had no new construction

#### Question 6

Are written reports to the commission submitted within 30 calendar days of a reportable incident? Do the reports 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.

**Q6 Reference**

WAC 480-75-630(2)

**Q6 Result**

Not Applicable

**Q6 Notes**

Seaport has had no reportable events requiring a 30-day report

#### Question 7

Do records indicate that telephonic reports are made to UTC Pipeline Safety Incident Notification line made within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline?

**Q7 Reference**

WAC 480-75-630(3)

**Q7 Result**

Satisfactory

**Q7 Notes**

Only one incident has occurred during this inspection period. The emergency shutdown occurred on 9/22/22 and commission staff received a notification on 9/22/22

#### Question 8

Does the operator file with the commission, not later than June 15 of each year, applicable to the preceding calendar year: A copy of PHMSA F-7000.1-1 Annual report; A report titled "Hazardous Liquid Annual Report Form", which can be obtained from the Pipeline Safety Section of the commission. This annual report must include in detail interstate and intrastate pipeline mileage in WA and a list of reportable and nonreportable safety related conditions as defined by 49 CFR 195.55

**Q8 Reference**

WAC 480-75-650

**Q8 Result**

Satisfactory

**Q8 Notes**

## DAMAGE PREVENTION RECORDS

### Question 9

THIS QUESTION EXISTS IN IA AS RPT.RR.DIRTREPORTS.R In the event of excavation damage, does the operator: report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)? 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? Does the operator retain all damage and damage claim records it creates related to damage events, including photographs and documentation supporting the conclusion that a facilities locate was not completed, reported under subsection (b) of this section for a period of two years and make those records available to the commission upon request?

#### Q9 Reference

WAC 480-75-630(4)

#### Q9 Result

Not  
Applicable

#### Q9 Notes

No damages have occurred on the pipeline

### Question 10

THIS QUESTION EXISTS IN IA AS PD.DP.NOTICETOEXCAVATOR.R Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? Notification requirements for excavators under RCW 19.122.050(1) A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 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.

#### Q10 Reference - 1

RCW 19.122

#### Q10 Reference - 2

WAC 480-75-630(5)

#### Q10 Result

Not Applicable

#### Q10 Notes

No damages have occurred on the pipeline

### Question 11

THIS QUESTION EXISTS IN IA AS PD.DP.COMMISSIONREPORT.R Does the operator report to the commission only when the operator or its contractor observes or becomes aware of any of the following activities? An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities.

#### Q11 Reference-1

RCW 19.122

#### Q11 Reference - 2

WAC 480-75-630(6)

#### Q11 Result

Not Applicable

#### Q11 Notes

None of these events have occurred

### Question 12

Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do records indicate that the operator conducts regular field audits of the performance of locators/contractors and take action when necessary?

#### Q12 Reference

PHMSA State Program  
Question

#### Q12 Result

Satisfactory

#### Q12 Notes

All locates are done by Recon, Seaport performs QA and photo review of all locates

### Question 13

Do records indicate operator includes performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

#### Q13 Reference

WAC 480-75-200

#### Q13 Result

Satisfactory

#### Q13 Notes

Contract is worded to include satisfactory work for continued contract and payment

### Question 14

Do locate entities address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

#### Q14 Reference

WAC 480-75-200

#### Q14 Result

Satisfactory

#### Q14 Notes

This is included as part of Recon's OQ program. Seaport has reviewed and accepted the contractors program.

### Question 15

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?

#### Q15 Reference

WAC 480-75-200

#### Q15 Result

Satisfactory

#### Q15 Notes

Review OQ plans when hiring a contractor and as needed

### Question 16

Are locates are being made within the timeframes required by RCW 19.122? Examine record sample.

#### Q16 Reference

RCW 19.122.035

#### Q16 Result

Satisfactory

#### Q16 Notes

Reviewed a sample of dig tickets from 2021, no tickets exceed 2 day requirements

### Question 17

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

#### Q17 Reference

WAC 480-75-200

#### Q17 Result

Satisfactory

#### Q17 Notes

Reviewed OQs for Recon, No tasks overdue

## OPERATIONS & MAINTENANCE RECORDS

### Question 18

THIS QUESTION EXISTS IN IA AS DC.PT.PRESSTESTRPT.R Has there been a change in MOP for the system? Was a hydrotest conducted as part of an effort to increase MOP? If so, did the operator file a report with the commission at least 45 days prior to pressure testing? If a report was submitted, did it include the change in MOP and sufficient information justifying a higher operating pressure?

Q18 Reference	Q18 Result	Q18 Notes
WAC 480-75-620	Not Applicable	There have been no changes to the MOP

#### Question 19

THIS QUESTION EXISTS IN IA AS MO.RW.DEPTHSURVEY.R (For lines constructed after 4/1/1970) does the operator conduct depth of cover surveys within its ROW every 5 years at a minimum to ensure minimum depth of cover as required by subsections (1) and (2)? In areas subject to erosion and subsoiling, this survey is required every 3 years. SEE CHART in 480-75-640(1) or 195.248 for appropriate depths, and 480-75-640(2) for exceptions.

Q19 Reference	Q19 Result	Q19 Notes
WAC 480-75-640	Satisfactory	

#### Question 20

Do leak detection records indicate that the operator provides leak detection for their system under both flow and no-flow conditions? Is the leak detection system capable of detecting a 8% maximum flow leak within 15 minutes or less? Has the company followed its procedure for leak detection and for responding to leak detection alarms? Does the company maintain leak detection maintenance and alarm records?

Q20 Reference	Q20 Result	Q20 Notes
WAC 480-75-300	Satisfactory	15 barrels over fifteen minutes 2800 bpm 0.1% maximum flow leak

#### Question 21

THIS QUESTION EXISTS IN IA AS MO.LMOPP.SURGEANALYSIS.R Has the operator conducted surge analyses to ensure that the surge pressure does not exceed 110% of the MOP? Is the operator's pressure relief system designed and operated consistent with that surge analysis at or below MOP except under surge conditions? This also applies to rapid shutdown valves (see Question 20/WAC 480-75-390)

Q21 Reference	Q21 Result	Q21 Notes
WAC 480-75-320	Satisfactory	Surge Analysis completed by Universal Pegasus in 2012

#### Question 22

Does the system contain Breakout Tanks (BOT)? If so, do records indicate that the BOTs have an independent level alarm?

Q22 Reference	Q22 Result	Q22 Notes
WAC 480-75-330	Satisfactory	Overfill protective device and radar level tank gauge

#### Question 23

Does the operator rapidly locate and isolate reportable releases from its pipeline? When determining valve type, its location, and shut-off time, does the operator consider the following: Terrain, geohazards, drainage, pipe type and condition. Whenever the operator installs a new rapid shutdown valve, does the operator conduct surge analysis to ensure that surge pressure will not exceed 110% MOP as a result of rapid valve closure?

Q23 Reference	Q23 Result	Q23 Notes
WAC 480-75-390	Not Applicable	Seaport has not installed any new rapid shutdown valves and has not had any releases of product

#### Question 24

THIS QUESTION EXISTS IN IA AS TD.COAT.NEWPIPEINSPECT.R Does the operator electrically inspect all new coated pipe using a holiday detector to check for faults not observable by visual examination? Is the holiday detector operated at the appropriate voltage level for the electrical characteristics of the pipe being tested?

Q24 Reference	Q24 Result	Q24 Notes
WAC 480-75-410	Not Applicable	Seaport has not installed any new pipe so has not had a need to jeeping the pipeline

#### Question 25

Has the operator conducted a hydrostatic test of any new or existing line since the last UTC standard comprehensive inspection? When hydrotesting, does the operator adhere to the following requirements: If a manifold is used, is the valve positioned between the pressure testing manifold and the pipeline being tested? Are the isolation valves rated for the manifold test pressure when in the closed position? Did the operator separately pressure test the manifold used in the hydrotest to at least 1.2 times the pipeline test pressure, but not less than the discharge pressure of the pump used for pressure testing? If a pressure relief valve is used, is each such valve must be of adequate capacity and set to relieve at 10% above the hydrotest pressure? Did the operator calibrate the relief valve within 1 month prior to the hydrotest? If a bleed valve is used to protect from overpressure, is the valve readily accessible during testing in case immediate depressurization is required? Did the operator maintain documents signed by a person with sufficient knowledge, certifying the accuracy of test information? Did the test documentation contain the following: Date of test, beginning and ending time of test, beginning and ending temperatures, highest and lowest pressures achieved, and a test chart or other record that shows the pressure maintained at the minimum test pressure throughout the entire test? Did the operator notify local government and fire department with jurisdiction in the area affected by the hydrotest? Did the operator post precautions/warning signs indicating that a hazardous liquid pipeline was under test? Did the operator ensure that no water was added to the pipeline after the hydrotest started? Did the operator comply with applicable rules of WA Department of Ecology addressing disposal of test water?

Q25 Reference	Q25 Result	Q25 Notes
WAC 480-75-420	Not Applicable	Seaport has not hydrotested their line since initial construction

#### Question 26

Did the operator make any new girth welds on new or repaired section of pipe since the last UTC standard comprehensive inspection? For new girth welds on new or repaired section of pipe: Were all girth welds inspected by radiography or automatic ultrasonic testing in accordance with API 1104? Did the operator

keep a log of each weld inspected and keep all inspection records for the life of the pipeline?

Q26 Reference	Q26 Result	Q26 Notes
WAC 480-75-460	Not Applicable	No welding has been performed since the last UTC inspection

#### Question 27

THIS QUESTION EXISTS IN IA AS DC.MO.MOVE.R Did the operator move or lower any line pipe since the last UTC standard comprehensive inspection? If any pipe was moved/lowered, did the operator prepare a study to determine whether movement would cause an unsafe condition? Was the study reviewed and approved by a person designated by the operator as qualified to review the study? Did the study include pipe stress calculations based on API RP 1117 "Movement of In-Service Pipelines"?

Q27 Reference	Q27 Result	Q27 Notes
WAC 480-75-500	Not Applicable	Seaport has not lowered or moved the pipeline

#### Question 28

THIS QUESTION EXISTS IN IA AS MO.LOMOP.MOPDETERMINE.R Does the operator reevaluate MOP when class locations change? Did the operator reevaluate class locations once every five years at a minimum?

Q28 Reference	Q28 Result	Q28 Notes
WAC 480-75-550	Satisfactory	There have been no changes in the class location. Study completed September 24, 2021, previous study was completed October 2017

## CORROSION CONTROL RECORDS

#### Question 29

Does each cathodically protected pipeline have test stations and other electrical measurement contact points located at pipe casings and at other locations sufficient to facilitate cathodic protection testing?

Q29 Reference	Q29 Result	Q29 Notes
WAC 480-75-340	Satisfactory	Test point at each end of pipeline and two points in between. Pipeline is 3 miles long Breakout tank is also tested during annual survey

#### Question 30

Did the operator identify any corrosion deficiencies since the last UTC standard comprehensive inspection? Did the operator initiate remedial action as necessary to correct any deficiency observed during corrosion monitoring within 90 days after the operator detected the deficiency?

Q30 Reference	Q30 Result	Q30 Notes
WAC 480-75-510	Satisfactory	There was one low read of -847 mV OFF, read is now -1333 mV

#### Question 31

Did the company examine all pipe exposed for any reason for evidence of mechanical damage or external corrosion, to include inspection of coating? Did the operator evaluate all mechanical damage and repair as necessary in accordance with procedures? Did the operator repair all coating damage prior to reburial of pipe? If the operator finds active corrosion, general corrosion, or corrosion that has caused a leak, did the operator investigate further to determine the extent of corrosion? Did the operator maintain a report of these inspections for the life of the pipeline?

Q31 Reference	Q31 Result	Q31 Notes
WAC 480-75-520	Not Applicable	Seaport has not exposed their pipeline since being placed in service

## DESIGN/CONSTRUCTION RECORDS

#### Question 32

THIS QUESTION EXISTS IN IA AS DC.CO.ASMECONSTRUCTION.R Are new pipelines designed and constructed in accordance with ASME B31.4 "Pipeline Transportation Systems for Liquid Hydrocarbon and Other Liquids"? Are longitudinal seams of connecting pipe joints offset by at least 2 inches? Are longitudinal seams located on the upper half of the pipe when laid in an open trench?

Q32 Reference	Q32 Result	Q32 Notes
WAC 480-75-350	Not Applicable	No new pipelines have been constructed since initial construction

#### Question 33

THIS QUESTION EXISTS IN IA AS DC.COCMP.PMPPROPERTY.R For newly constructed pump stations: Constructed with prior approval of the appropriate zoning authority and having acquired all the necessary permits? In areas not zoned, the pump station shall not be located closer than 500 feet from an existing building intended for human occupancy (other than a building under control of the pipeline company).When locating new pump stations and breakout tanks, does the company consider such hazards as overhead powerlines, geologic faults, areas prone to flooding, landslides, and falling rocks?

Q33 Reference	Q33 Result	Q33 Notes
WAC 480-75-380	Not Applicable	No new pump stations have been built

## RECORDS: REQUIRED COMMENTS

RECORDS REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

## FIELD INSPECTION OBSERVATIONS

#### Question 34

Are proper pipeline markers emplaced wherever line pipe and associated facilities are exposed? Do all lines attached to bridges or otherwise spanning an area have markers visible and readable at both ends of the suspended pipeline? Are markers inspected annually and replaced within 30 days if found to be missing or damaged?

<b>Q34</b>	<b>Q34 Result</b>	<b>Q34 Notes</b>
<b>Reference</b> WAC 480-75-540	Satisfactory	Drove the entire ROW during the inspection, many markers visible along ROW and at river crossings. Marker condition looked good. Picture attached in IA

**Question 35**

Are pressure relief devices set at or below MOP?

<b>Q35</b>	<b>Q35 Result</b>	<b>Q35 Notes</b>
<b>Reference</b> WAC 480-75-320	Satisfactory	Relief valves set at 265 psig, MOP is 540 psig

**Question 36**

Does leak detection system detect 8% max flow leakage within 15 minutes? Does the system detect leakage in both flow and no-flow conditions?

<b>Q36</b>	<b>Q36 Result</b>	<b>Q36 Notes</b>
<b>Reference</b> WAC 480-75-300	Satisfactory	

**Question 37**

Do Breakout Tanks have independent overfill alarms?

<b>Q37</b>	<b>Q37 Result</b>	<b>Q37 Notes</b>
<b>Reference</b> WAC 480-75-330	Satisfactory	Overfill alarm tested during field inspection. Alarm received by controller and Olympic

**Comments - Field Observations - Any rating other than Satisfactory, requires comments. Ensure you annotate the question number for each comment.**

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