

# Inspection Output (IOR)

Generated on 2021.April.22 14:29

## Inspection Information

Inspection Name	8300 Seaport O&M	Operator(s)	SEAPORT SOUND TERMINAL, LLC (39906)	Plan Submitted	03/25/2021
Status	PLANNED	Lead	Derek Norwood	Plan Approval	03/25/2021 by Joe Subsis
Start Year	2021	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Scott Anderson, Darren Tinnerstet	All Activity Start	04/19/2021
System Type	HL	Observer(s)	David D. Lykken, Deborah Becker, Rell Koizumi	All Activity End	04/22/2021
Protocol Set ID	HL.2021.01	Supervisor	Joe Subsis	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

This inspection was conducted at Seaport Sound Terminal in Tacoma, WA on April 19 and April 20, 2021. The manuals reviewed included O&M procedures, Corrosion Control, Pressure Testing, Emergency Response, Design, Construction and Public Awareness. There were no areas of concern or probable violations found as a result of this 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

Rob Cohee  
Pipeline Supervisor  
(253) 331-7278

### 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	Inspected	Total	Required % Complete
1.	88920	Seaport Sound Terminal	unit	88920	Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress Abandoned	120	120	120	120	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	Baseline Procedures (Form 3)	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail

## Plan Implementations

Activity # Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. Procedures --		04/19/2021 04/22/2021	Baseline Procedures (Form 3)	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	all assets	all types	120	120	120	120	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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Procedures	COMPLETED	04/22/2021	Procedures	88920

## Results (Unsat, Concern values, 0 results)

This inspection has no matching Results.

Report Parameters: Results: Unsat, Concern

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.

# Inspection Results (IRR)

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• 88920 (143)

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
1.	(and 1 other asset)	Sat		AR.RMP	1.	AR.RMP.SAFETY.P	195.402(c)(14) (195.422(a), 195.452(h)(1))	Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?
2.	(and 1 other asset)	Sat		CR.SCADA	12.	CR.SCADA.SETPOINT.P	195.446(c)(2) (195.406(b))	Does the process adequately define safety-related points?
3.	(and 1 other asset)	NA		CR.LD	1.	CR.LD.LDEVAL.P	195.444(a) (195.444(b), 195.452(i)(3))	Does the process adequately address the evaluation of the operators leak detection system and require modification as necessary?
4.	(and 1 other asset)	NA		CR.LD	2.	CR.LD.LDEFFECTIVE.P	195.402(a) (195.134(a), 195.134(b), 195.444(a), 195.444(b))	Do the processes adequately describe that the operator has an effective system for detecting leaks?
5.	(and 1 other asset)	NA		CR.LD	5.	CR.LD.LDTRAINING.P	195.505(h)	Do the processes define and require that pipeline controllers are trained to recognize leaks based on the system implemented?
6.	(and 1 other asset)	NA		CR.LD	8.	CR.LD.ALARMDISPLAY.P	195.444(b)	Do the processes define and describe the alarms appropriate for the leak detection system implemented?
7.	(and 1 other asset)	NA		CR.LD	10.	CR.LD.LDSTEST.P	195.444(b) (195.134(b))	Do the processes define and describe the testing of the Leak Detection System?
8.	(and 1 other asset)	NA		CR.LD	12.	CR.LD.LDSMOC.P	195.444(b) (195.134(b))	Are parameter and/or system changes required to be reflected in the leak detection system?
9.	(and 1 other asset)	NA		CR.LD	13.	CR.LD.LDSCADA.P	195.134(b) (195.444(b))	Are the leak detection system data, communication, and controller interfaces appropriately integrated with the SCADA displays?
10.	(and 1 other asset)	NA		CR.LD	14.	CR.LD.LDSINSTRUMENT.P	195.134(b) (195.444(b))	Is the accuracy and calibration of field instrumentation used in the leak detection

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Asset	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								system appropriately assured?
11.	(and 1 other asset)	NA		CR.LD	16.	CR.LD.LDSPROTECT.P	195.402(a)	Is the Leak Detection System adequately protected from security threats?
12.	(and 1 other asset)	Sat	(2)	DC.WELDINS	4.	DC.WELDINS.WELDREPAIR.P	195.202 (195.230(a), 195.230(b), 195.230(c))	Are welds that are unacceptable required to be removed and/or repaired as specified by 195.230 and are repair procedures in place?
13.	(and 1 other asset)	Sat	(2)	DC.WELDINS	7.	DC.WELDINS.WELDNDR.P	195.234(a) (195.234(b), 195.234(c))	Are there processes for nondestructive testing and for determining standards of acceptability?
14.	(and 1 other asset)	Sat	(2)	DC.WELDINS	10.	DC.WELDINS.WELDNDRQUAL.P	195.202 (195.234(b)(2))	Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel who are trained in procedures established to ensure compliance with 195.228 and in use of the testing equipment?
15.	(and 1 other asset)	Sat	(2)	DC.WELDINS	11.	DC.WELDINS.GIRTHWELDNDR.P	195.202 (195.234(d), 195.234(e), 195.234(f), 195.234(g), 195.266)	Does the process require certain girth welds to be nondestructively tested in accordance with 195.234(d), (e), (f), and (g)?
16.	(and 1 other asset)	Sat	(2)	DC.WELDERQUAL	1.	DC.WELDERQUAL.WELDERQUAL.P	195.222(a) (195.222(b))	Is each welder required to be qualified in accordance with section 6 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code?
17.	(and 1 other asset)	Sat	(2)	DC.WELDPROCEDURE	3.	DC.WELDPROCEDURE.WELD.P	195.214(a)	Does the process require welding to be performed by qualified welders using qualified welding procedures?
18.	(and 1 other asset)	Sat	(2)	DC.WELDPROCEDURE	5.	DC.WELDPROCEDURE.WELDPROCEDURE.P	195.214(b)	Are welding procedures and qualifying tests required to be recorded in detail?
19.	(and 1 other asset)	Sat	(2)	DC.WELDPROCEDURE	11.	DC.WELDPROCEDURE.ARCBURNGRNDWIRE.P	195.202 (195.226(a), 195.226(b), 195.226(c))	Does the process address arc burns and ground wires in accordance with 195.226?
20.	(and 1 other asset)	Sat	(2)	DC.DN	5.	DC.DN.DESIGNPRESS.P	195.106(a) (195.106(b), 195.106(c), 195.106(d), 195.106(e))	Does the process require the internal design pressure of the pipeline (or pipe) be determined in

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								accordance with 195.106?
21.	(and 1 other asset)	Sat		DC.DN	26.	DC.DN.ILIPASS.P	195.202 (195.120(a), 195.120(b), 195.120(c), 195.120(d))	Does the process require the pipeline be designed and constructed to accommodate the passage of instrumented internal inspection devices?
22.	(and 1 other asset)	Sat		DC.DN	32.	DC.DN.LDDESIGN.P	195.134(a) (195.134(b), 195.134(c), 195.444(a), 195.444(b), 195.444(c))	Are newly constructed pipeline segments required to have a leak detection system that protects the public, property, and the environment?
23.	(and 1 other asset)	Sat		DC.MO	9.	DC.MO.MOVE.P	195.402(a) (195.424(a), 195.424(b), 195.424(c))	Has a process been developed for pipeline movements in accordance with 195.424?
24.	(and 1 other asset)	Sat		DC.PT	1.	DC.PT.PRESSTEST.P	195.402(c) (195.302(a), 195.304, 195.305, 195.306, 195.310)	Does the process have adequate test procedures?
25.	(and 1 other asset)	Sat		DC.PT	4.	DC.PT.PRESSTESTTIEIN.P	195.402(c) (195.308)	Does the process require testing of pipe associated with tie-ins, either with the section to be tied in or separately?
26.	(and 1 other asset)	Sat	(2)	TDC.TKPIPING	1.	DC.DN.DESIGNPRESS.P	195.106(a) (195.106(b), 195.106(c), 195.106(d), 195.106(e))	Does the process require the internal design pressure of the pipeline (or pipe) be determined in accordance with 195.106?
27.	(and 1 other asset)	Sat	(2)	TDC.WELDPROCEDURE	1.	DC.WELDPROCEDURE.WELDPROCEDURE.P	195.214(b)	Are welding procedures and qualifying tests required to be recorded in detail?
28.	(and 1 other asset)	Sat	(2)	TDC.WELDPROCEDURE	4.	DC.WELDPROCEDURE.WELD.P	195.214(a)	Does the process require welding to be performed by qualified welders using qualified welding procedures?
29.	(and 1 other asset)	Sat	(2)	TDC.WELDPROCEDURE	12.	DC.WELDPROCEDURE.ARCBURNGRND WIRE.P	195.202 (195.226(a), 195.226(b), 195.226(c))	Does the process address arc burns and ground wires in accordance with 195.226?
30.	(and 1 other asset)	Sat	(2)	TDC.WELDERQUAL	1.	DC.WELDERQUAL.WELDERQUAL.P	195.222(a) (195.222(b))	Is each welder required to be qualified in accordance with section 6 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code?

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Row	Assets	Result	Note	Sub-Group	Question #	Question ID	References	Question Text
31.	(and 1 other asset)	Sat	(2)	TDC.WELDINS	4.	DC.WELDINSP.WELDREPAIR.P	195.202 (195.230(a), 195.230(b), 195.230(c))	Are welds that are unacceptable required to be removed and/or repaired as specified by 195.230 and are repair procedures in place?
32.	(and 1 other asset)	Sat	(2)	TDC.WELDINS	7.	DC.WELDINSP.WELDNDT.P	195.234(a) (195.234(b), 195.234(c))	Are there processes for nondestructive testing and for determining standards of acceptability?
33.	(and 1 other asset)	Sat	(2)	TDC.WELDINS	10.	DC.WELDINSP.WELDNDTQUAL.P	195.202 (195.234(b)(2))	Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel who are trained in procedures established to ensure compliance with 195.228 and in use of the testing equipment?
34.	(and 1 other asset)	Sat	(2)	TDC.WELDINS	11.	DC.WELDINSP.GIRTHWELDNDT.P	195.202 (195.234(d), 195.234(e), 195.234(f), 195.234(g), 195.266)	Does the process require certain girth welds to be nondestructively tested in accordance with 195.234(d), (e), (f), and (g)?
35.	(and 1 other asset)	Sat		EP.ERL	6.	EP.ERL.ACCIDENTANALYSIS.P	195.402(a) (195.402(c)(5), 195.402(c)(6))	Does the O&M plan include processes for analyzing pipeline accidents to determine their causes?
36.	(and 1 other asset)	Sat		EP.ERL	8.	EP.ERL.LIAISON.P	195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4)	Does the O&M plan include processes for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?
37.	(and 1 other asset)	Sat		EP.ERL	10.	EP.ERL.NOTICES.P	195.402(a) (195.402(e)(1))	Does the emergency plan include processes for receiving, identifying, and classifying notices of events which need immediate response and providing notice to operator personnel or to fire, police or other appropriate officials, as appropriate, for corrective action?
38.	(and 1 other asset)	Sat		EP.ERL	12.	EP.ERL.RESPONSE.P	195.402(a) (195.402(c)(4), 195.402(c)(6), 195.402(e)(2), 195.402(e)(10))	Does the emergency plan include processes for making a prompt and effective response to a notice of each type of emergency, fire, explosion, accidental release of a hazardous liquid, operational

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								failure, or natural disaster affecting the pipeline?
39.	(and 1 other asset)	Sat		EP.ERL	13.	EP.ERL.READINESS.P	195.402(a)(195.402(e)(3))	Does the emergency plan include processes to ensure the availability of personnel, equipment, instruments, tools, and materials as needed at the scene of an emergency?
40.	(and 1 other asset)	Sat		EP.ERL	15.	EP.ERL.RELEASEREDUCE.P	195.402(a)(195.402(e)(4))	Does the emergency plan include processes for taking necessary action; such as an emergency shutdown or pressure reduction, to minimize the volume released from any section of a pipeline system in the event of a failure?
41.	(and 1 other asset)	Sat		EP.ERL	16.	EP.ERL.HAZREDUCE.P	195.402(a)(195.402(c)(11), 195.402(e)(5))	Does the emergency plan include processes for controlling the release of liquid at an accident scene to minimize the hazards, including possible ignition in the cases of flammable HVLs?
42.	(and 1 other asset)	Sat		EP.ERL	17.	EP.ERL.PUBLICHAZ.P	195.402(a)(195.402(e)(6))	Does the emergency plan include procedures for minimizing public exposure to injury and probability of accidental ignition by assisting with evacuation, assisting with halting traffic on roads and railroads, or taking other appropriate action?
43.	(and 1 other asset)	Sat		EP.ERL	18.	EP.ERL.AUTHORITIES.P	195.402(a)(195.402(e)(7))	Does the emergency plan include processes for notifying fire, police, and other appropriate public officials of hazardous liquid emergencies and coordinating with them preplanned and actual responses during an emergency, including additional precautions necessary for an emergency involving HVLs?
44.	(and 1 other asset)	Sat		EP.ERL	22.	EP.ERL.POSTEVNTREVIEW.P	195.402(a)(195.402(e)(9))	Does the emergency plan include processes for providing for a post-accident review of employee activities to determine whether the

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Asset	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								procedures were effective in each emergency and taking corrective action where deficiencies are found?
45.	(and 1 other asset)	Sat		EP.ERL	24.	EP.ERL.COMMSYS.P	195.408(a) (195.408(b))	Does the process address emergency communication system(s)?
46.	(and 1 other asset)	Sat	(2)	FS.FG	5.	FS.FG.SIGNAGE.P	195.402(c)(3) (195.434)	Does the process require operator signs to be posted around each pump station and breakout tank area?
47.	(and 1 other asset)	Sat	(2)	FS.FG	6.	FS.FG.IGNITION.P	195.402(c)(3) (195.438)	Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?
48.	(and 1 other asset)	Sat	(2)	FS.FG	7.	FS.FG.PROTECTION.P	195.402(c)(3) (195.436)	Does the process require facilities to be protected from vandalism and unauthorized entry?
49.	(and 1 other asset)	Sat		FS.FG	8.	FS.FG.FIREPROT.P	195.402(c)(3) (195.430(a), 195.430(b), 195.430(c))	Does the process require firefighting equipment at pump station/breakout tank areas?
50.	(and 1 other asset)	Sat	(2)	FS.PS	5.	MO.LMOPP.PRESSREGTEST.P	195.402(c)(3) (195.428(a))	Does the process adequately detail the inspecting and testing of each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment?
51.	(and 1 other asset)	Sat	(2)	FS.PS	12.	MO.LMOPP.LAUNCHRECVRELIEF.P	195.402(c)(3) (195.426)	Does the process include requirements for relief devices and their proper use for launchers and receivers?
52.	(and 1 other asset)	Sat		FS.TS	6.	FS.TS.OVERFILLBO.P	195.402(c)(3) (195.428(a), 195.428(c), 195.428(d))	Does the process require adequate testing and inspection of overfill devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]
53.	(and 1 other asset)	Sat	(2)	FS.VA	1.	MO.LM.VALVEMAIN.P	195.402(c)(3) (195.420(a))	Does the process adequately address the maintenance program for each valve that is necessary for safe



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Row	Asset	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								operation of the pipeline system?
54.	(and 1 other asset)	Sat	(2)	FS.VA	2.	MO.LM.VALVEMAINBTBIANN.P	195.402(c)(3) (195.420(b))	Does the process address inspecting each mainline valve?
55.	(and 1 other asset)	Sat	(2)	FS.VA	5.	MO.LM.VALVEPROTECT.P	195.402(c)(3) (195.420(c))	Does the process contain criteria for providing protection for each valve from unauthorized operation and from vandalism?
56.	(and 1 other asset)	Sat		MO.LO	1.	MO.LO.OMMANUAL.P	195.402(a) (195.402(c))	Does the operator have an O&M manual, and has a procedure to properly maintain all portions of the manual?
57.	(and 1 other asset)	Sat		MO.LO	3.	MO.LO.OMHISTORY.P	195.402(a) (195.402(c)(1)), 195.404(a), 195.404(a)(1), 195.404(a)(2), 195.404(a)(3), 195.404(a)(4), 195.404(c)(1), 195.404(c)(2), 195.404(c)(3)	Does the process address making construction records, maps, and operating history available as necessary for safe operation and maintenance?
58.	(and 1 other asset)	Sat		MO.LO	10.	MO.LO.OMEFFECTREVIEW.P	195.402(a) (195.402(c)(13))	Does the process address periodically reviewing the work done by the operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found?
59.	(and 1 other asset)	Sat		MO.LO	12.	MO.LO.SRCR.P	195.402(a) (195.402(f), 195.55(a))	Does the procedure include instructions that allow personnel to recognize safety related conditions?
60.	(and 1 other asset)	Sat		MO.LO	13.	MO.LO.PRESSTESTREQ.P	195.402(c)(3) (195.302(b), 195.302(c))	Does the procedure require pressure testing for all lines except as allowed by 195.302(b)?
61.	(and 1 other asset)	Sat		MO.LO	17.	MO.LO.OPRECORDS.P	195.402(a) (195.402(c)(3), 195.404(b))	Does the process include requirements that operating records that relate to 195.402 activities be maintained?
62.	(and 1 other asset)	Sat		MO.LOOPER	1.	MO.LOOPER.PRESSURELIMIT.P	195.402(a) (195.402(c)(7))	Does the process include procedures for starting up and shutting down any part of the pipeline system in a

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								manner designed to assure operation within the limits prescribed by 195.406?
63.	(and 1 other asset)	NA		MO.LOOPER	3.	MO.LOOPER.FAILSAFE.P	195.402(a) (195.402(c)(8))	In the case of a pipeline that is not equipped to fail safe, does the process include procedures for monitoring from an attended location pipeline pressure during startup until steady state pressure and flow conditions are reached and during shut-in to assure operation within the limits of 195.406?
64.	(and 1 other asset)	Sat	(2)	MO.LMOPP	1.	MO.LMOPP.PRESSREGTEST.P	195.402(c)(3) (195.428(a))	Does the process adequately detail the inspecting and testing of each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment?
65.	(and 1 other asset)	Sat		MO.LOMOP	1.	MO.LOMOP.MOPDETERMINE.P	195.402(c)(3) (195.302(c), 195.406(a))	Does the process include procedures for establishing the maximum operating pressure allowed in accordance with 195.406(a)?
66.	(and 1 other asset)	Sat	(2)	MO.LMOPP	6.	MO.LMOPP.LAUNCHRECVRELIEF.P	195.402(c)(3) (195.426)	Does the process include requirements for relief devices and their proper use for launchers and receivers?
67.	(and 1 other asset)	Sat		MO.ABNORMAL	1.	MO.ABNORMAL.ABNORMAL.P	195.402(a) (195.402(d)(1))	Does the process include procedures for responding to, investigating, and correcting the cause of the listed abnormal operating conditions?
68.	(and 1 other asset)	Sat	(2)	MO.LM	1.	MO.LM.VALVEMAINTEBIANN.P	195.402(c)(3) (195.420(b))	Does the process address inspecting each mainline valve?
69.	(and 1 other asset)	Sat	(2)	MO.LM	2.	MO.LM.VALVEMAINTE.P	195.402(c)(3) (195.420(a))	Does the process adequately address the maintenance program for each valve that is necessary for safe operation of the pipeline system?
70.	(and 1 other asset)	Sat		MO.ABNORMAL	3.	MO.ABNORMAL.ABNORMALCHECK.P	195.402(a) (195.402(d)(2))	Does the process include procedures for checking variations from normal operation after abnormal operations have ended at sufficient locations in the system

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Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
								to determine continued integrity and safe operations?
71.	(and 1 other asset)	Sat	(2)	MO.RW	4.	MO.RW.PATROL.P	195.402(a) (195.412(a), 195.412(b))	Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?
72.	(and 1 other asset)	Sat		MO.ABNORMAL	4.	MO.ABNORMAL.ABNORMALCORRECT.P	195.402(a) (195.402(d)(3))	Does the process include procedures for correcting variations from normal operation of pressure and flow equipment and controls?
73.	(and 1 other asset)	Sat	(2)	MO.LM	4.	MO.LM.VALVEPROTECT.P	195.402(c)(3) (195.420(c))	Does the process contain criteria for providing protection for each valve from unauthorized operation and from vandalism?
74.	(and 1 other asset)	Sat	(2)	MO.RW	5.	MO.RW.ROWMARKER.P	195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 1162, Section 8)	Does the process address how line markers are to be placed and maintained?
75.	(and 1 other asset)	Sat		MO.ABNORMAL	5.	MO.ABNORMAL.ABNORMALNOTIFY.P	195.402(a) (195.402(d)(4))	Does the process include procedures for ensuring operating personnel notify responsible operator personnel where notice of an abnormal operation is received?
76.	(and 1 other asset)	Sat		MO.ABNORMAL	6.	MO.ABNORMAL.ABNORMALREVIEW.P	195.402(a) (195.402(d)(5))	Does the process include procedures for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures for controlling abnormal operation and taking corrective action where deficiencies are found?
77.	(and 1 other asset)	NA		MO.LC	1.	MO.LC.CONVERSION.P	195.5(a) (195.5(b), 195.5(c))	If any pipelines were converted into Part 195 service, was a process developed addressing all the applicable requirements?
78.	(and 1 other asset)	Sat		MO.EW	1.	MO.EW.EXTWEATHERCRIT.P	195.402(a) (195.414(a))	Does the process adequately detail the specific weather or natural disaster conditions that would require an inspection?

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
79.	(and 1 other asset)	Sat		MO.EW	2.	MO.EW.EXTWEATHERINSPREQT.P	195.402(a) (195.414(b), 195.414(c))	Does the process adequately detail initial inspection requirements?
80.	(and 1 other asset)	Sat		MO.EW	3.	MO.EW.EXTWEATHERREMEDIAL.P	195.402(a) (195.414(d))	Does the process adequately detail remedial action requirements?
81.	(and 1 other asset)	Sat		PD.DP	1.	PD.DP.ONECALL.P	195.442(a) (195.442(b))	Does the process require participation in qualified one-call systems?
82.	(and 1 other asset)	Sat		PD.DP	2.	PD.DP.PROGRAM.P	195.442(a)	Does the operator have a damage prevention program approved and in place?
83.	(and 1 other asset)	Sat		PD.DP	3.	PD.DP.PUBLICNOTIFY.P	195.442(a) (195.442(c)(2))	Does the process include public notification requirements?
84.	(and 1 other asset)	Sat		PD.DP	4.	PD.DP.EXCAVATEMARK.P	195.442(a) (195.442(b), 195.442(c)(4), 195.442(c)(5))	Does the process require marking proposed excavation sites?
85.	(and 1 other asset)	Sat		PD.DP	5.	PD.DP.EXCAVATE.P	195.442(a) (195.442(c)(6))	Does the process include inspection of pipelines that could be damaged by excavation activities?
86.	(and 1 other asset)	Sat		PD.DP	6.	PD.DP.TPD.P	195.442(a) (195.442(b), 195.442(c)(1))	Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?
87.	(and 1 other asset)	Sat		PD.DP	7.	PD.DP.TPDONECALL.P	195.442(a) (195.442(b), 195.442(c)(3))	Does the process specify how reports of TPD are checked against One-Call tickets?
88.	(and 1 other asset)	Sat		PD.PA	1.	PD.PA.ASSETS.P	195.440(b) (API RP 1162, Section 2.7 Step 4)	Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?
89.	(and 1 other asset)	Sat		PD.PA	2.	PD.PA.AUDIENCEID.P	195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162 Section 3)	Does the program establish methods to 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

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								municipalities, school districts, businesses, and residents?
90.	(and 1 other asset)	Sat		PD.PA	3.	PD.PA.MGMTSUPPORT.P	195.440(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)	Does the operator's program documentation demonstrate management support?
91.	(and 1 other asset)	Sat		PD.PA	4.	PD.PA.PROGRAM.P	195.440(a) (195.440(h))	Has the continuing public education (awareness) program been established as required?
92.	(and 1 other asset)	Sat		PD.PA	6.	PD.PA.MESSAGES.P	195.440(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)	Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where hazardous liquid or carbon dioxide is transported?
93.	(and 1 other asset)	Sat		PD.PA	7.	PD.PA.SUPPLEMENTAL.P	195.440(c) (API RP 1162 Section 6.2)	Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience along all pipeline systems, as described in API RP 1162?
94.	(and 1 other asset)	Sat		PD.PA	12.	PD.PA.LANGUAGE.P	195.440(g) (API RP 1162 Section 2.3.1)	Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
95.	(and 1 other asset)	Sat		PD.PA	14.	PD.PA.EVALPLAN.P	195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E)	Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?
96.	(and 1 other asset)	Sat	(2)	PD.RW	1.	MO.RW.PATROL.P	195.402(a) (195.412(a), 195.412(b))	Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?
97.	(and 1 other asset)	Sat	(2)	PD.RW	5.	MO.RW.ROWMARKER.P	195.402(a) (195.410(a), 195.410(c), API RP 1162,	Does the process address how line markers are to be placed and maintained?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
							Section 2.7, API RP 1162, Section 8)	
98.	(and 1 other asset)	Sat	(2)	PD.SN	5.	FS.FG.IGNITION.P	195.402(c)(3) (195.438)	Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?
99.	(and 1 other asset)	Sat	(2)	PD.SN	6.	FS.FG.PROTECTION.P	195.402(c)(3) (195.436)	Does the process require facilities to be protected from vandalism and unauthorized entry?
100.	(and 1 other asset)	Sat	(2)	PD.SN	7.	FS.FG.SIGNAGE.P	195.402(c)(3) (195.434)	Does the process require operator signs to be posted around each pump station and breakout tank area?
101.	(and 1 other asset)	NA		RPT.RR	8.	RPT.RR.GRAVITY.P	195.13(a) (195.13(b), 195.13(c))	Does the process comply with the reporting requirements in Subpart B relating to gravity lines?
102.	(and 1 other asset)	NA		RPT.RR	10.	RPT.RR.REGONLYGATHER.P	195.15(a) (195.15(b), 195.15(c))	Does the process comply with the reporting requirements in Subpart B relating to regulated-only gathering lines?
103.	(and 1 other asset)	Sat		RPT.RR	12.	RPT.RR.ACCIDENTREPORT.P	195.54(a) (195.50(a), 195.50(b), 195.50(c), 195.50(d), 195.50(e), 195.13(b), 195.15(b))	Does the process require preparation and filing of an accident report as soon as practicable but no later than 30 days after discovery of a reportable accident?
104.	(and 1 other asset)	Sat		RPT.RR	14.	RPT.RR.ACCIDENTREPORTSUPP.P	195.402(a) (195.402(c)(2), 195.54(b), 195.13(b), 195.15(b))	Does the process require preparation and filing of supplemental accident reports?
105.	(and 1 other asset)	Sat		RPT.RR	16.	RPT.RR.IMMEDREPORT.P	195.402(a) (195.402(c)(2), 195.52(b), 195.52(c), 195.52(d))	Are procedures in place to immediately report accidents to the National Response Center?
106.	(and 1 other asset)	Sat		RPT.RR	20.	RPT.RR.SRCR.P	195.402(a) (195.55(a), 195.55(b), 195.56(a), 195.56(b), 195.13(b), 195.15(b))	Are processes in place to file safety-related condition reports if the conditions of 195.55 are met?
107.	(and 1 other asset)	Sat		RPT.RR	27.	RPT.RR.OPID.P	195.64(a) (195.64(c), 195.64(d))	Does the process require the obtaining, and appropriate control,

Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Asset	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
	other asset)							of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/upprate?
108	(and 1 other asset)	Sat		TD.ATM	1.	TD.ATM.ATMCORRODECOAT.P	195.402(c)(3) (195.581(a), 195.581(b), 195.581(c))	Does the process give adequate instruction for the protection of pipeline against atmospheric corrosion?
109	(and 1 other asset)	Sat		TD.ATM	3.	TD.ATM.ATMCORRODEINSP.P	195.402(c)(3) (195.583(a), 195.583(b), 195.583(c))	Does the process give adequate instruction for the inspection of aboveground pipeline segments exposed to the atmosphere?
110	(and 1 other asset)	Sat		TD.CPBO	2.	TD.CPBO.BO.P	195.402(c)(3) (195.573(d))	Does the process adequately detail when and how cathodic protection systems will be inspected on breakout tanks?
111	(and 1 other asset)	Sat	(2)	TD.CP	1.	TD.CP.MAPRECORD.P	195.589(a) (195.589(b))	Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?
112	(and 1 other asset)	Sat	(3)	TD.CP	2.	TD.CP.DEFICIENCY.P	195.402(c)(3) (195.573(e))	Does the process require correction of any identified deficiencies in corrosion control?
113	(and 1 other asset)	Sat	(2)	TD.CP	3.	TQ.QU.CORROSIONSUPERVISE.P	195.402(c) (195.555, 195.505(h))	Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?
114	(and 1 other asset)	Sat		TD.CP	5.	TD.CP.NEWOPERATE.P	195.402(c)(3) (195.563(a), 195.563(c), 195.563(d))	Does the process specify when cathodic protection must be operational on constructed, relocated, replaced, or otherwise changed pipelines?
115	(and 1 other asset)	NA		TD.CP	7.	TD.CP.UNPROTECT.P	195.402(c)(3) (195.563(e), 195.573(b)(1), 195.573(b)(2))	Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?
116	(and 1 other asset)	Sat		TD.CP	9.	TD.CP.ISOLATE.P	195.402(c)(3) (195.575(a), 195.575(b),	Does the process give adequate guidance for electrically isolating each buried or

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
							195.575(c), 195.575(d))	submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?
117	(and 1 other asset)	Sat	(2)	TD.CPMONITOR	1.	TD.CP.MAPRECORD.P	195.589(a) (195.589(b))	Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?
118	(and 1 other asset)	Sat	(3)	TD.CPMONITOR	2.	TD.CP.DEFICIENCY.P	195.402(c)(3) (195.573(e))	Does the process require correction of any identified deficiencies in corrosion control?
119	(and 1 other asset)	Sat		TD.CPMONITOR	3.	TD.CPMONITOR.TESTLEADINSTALL.P	195.402(c) (195.567(b))	Does the process provide adequate instructions for the installation of test leads?
120	(and 1 other asset)	Sat		TD.CPMONITOR	6.	TD.CPMONITOR.TESTLEADMAINT.P	195.402(c)(3) (195.567(c))	Does the process require that test lead wires must be properly maintained?
121	(and 1 other asset)	Sat		TD.CPMONITOR	9.	TD.CPMONITOR.MONITORCRITERIA.P	195.402(c)(3) (195.571)	Does the process require that CP monitoring criteria be used that is acceptable?
122	(and 1 other asset)	Sat		TD.CPMONITOR	12.	TD.CPMONITOR.TEST.P	195.402(c)(3) (195.573(a)(1))	Does the process adequately describe how to monitor CP that has been applied to pipelines?
123	(and 1 other asset)	Sat		TD.CPMONITOR	14.	TD.CPMONITOR.CIS.P	195.402(c)(3) (195.573(a)(2))	Does the process adequately describe the circumstances in which a CIS or comparable technology is practicable and necessary no more than 2 years after a cathodic protection system has been installed?
124	(and 1 other asset)	Sat		TD.CPMONITOR	16.	TD.CPMONITOR.CURRENTTEST.P	195.402(c)(3) (195.573(c))	Does the process give sufficient details for making electrical checks of rectifiers, interference bonds, diodes, and reverse current switches?
125	(and 1 other asset)	Sat		TD.CPMONITOR	19.	TD.CPMONITOR.INTFRCURRENT.P	195.402(c)(3) (195.577(a), 195.577(b))	Does the operator have a process in place to minimize detrimental effects of interference currents on its pipeline system and do the



## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
								procedures for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?
126	(and 1 other asset)	Sat		TD.COAT	1.	TD.COAT.NEWPIPE.P	195.402(c)(3) (195.557(a), 195.559, 195.401(c))	Does the process require coatings for pipelines constructed, relocated, replaced, or otherwise changed after the applicable date in 195.401(c) to meet the requirements of 195.559?
127	(and 1 other asset)	Sat		TD.COAT	2.	TD.COAT.NEWPIPEINSPECT.P	195.402(c)(3) (195.561(a), 195.561(b))	Does the process require that the coating be inspected on new pipelines just prior to it being lowered into the pipe trench?
128	(and 1 other asset)	Sat	(3)	TD.CPEXPOSED	1.	TD.CP.DEFICIENCY.P	195.402(c)(3) (195.573(e))	Does the process require correction of any identified deficiencies in corrosion control?
129	(and 1 other asset)	Sat		TD.CPEXPOSED	2.	TD.CPEXPOSED.EXPOSEINSPECT.P	195.402(c)(3) (195.569)	Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination required to determine the extent of the corrosion?
130	(and 1 other asset)	Sat		TD.CPEXPOSED	5.	TD.CPEXPOSED.EXTCORRODEEVAL.P	195.402(c)(3) (195.587)	Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?
131	(and 1 other asset)	Sat		TD.CPEXPOSED	7.	TD.CPEXPOSED.EXTCORRODEREPAIR.P	195.402(c)(3) (195.585(a), 195.585(b))	Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?
132	(and 1 other asset)	Sat		TD.ICP	3.	TD.ICP.INVESTREMEDI.P	195.402(c)(3) (195.579(a))	Does the process give adequate guidance for investigating and remediating the corrosive effects of hazardous liquids or carbon dioxide being transported?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	Note	Sub-Group	Question #	Question ID	References	Question Text
133	(and 1 other asset)	NA		TD.ICP	5.	TD.ICP.INHIBITOR.P	195.402(c)(3), 195.579(b)(1), 195.579(b)(2), 195.579(b)(3)	Does the process give adequate direction for the utilization of corrosion inhibitors?
134	(and 1 other asset)	Sat		TD.ICP	8.	TD.ICP.EXAMINE.P	195.402(c)(3), 195.579(a), 195.579(c)	Does the process direct personnel to examine removed pipe for evidence of internal corrosion?
135	(and 1 other asset)	Sat		TD.ICP	11.	TD.ICP.EVALUATE.P	195.402(c)(3), 195.587	Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?
136	(and 1 other asset)	Sat	(2)	TQ.QU	1.	TQ.QU.CORROSIONSUPERVISE.P	195.402(c), 195.555, 195.505(h)	Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?
137	(and 1 other asset)	Sat		TQ.TRERP	1.	TQ.TRERP.ERCONDITIONS.P	195.403(a)(3)	Are conditions that are likely to cause emergencies, their consequences, and appropriate corrective action identified in the ER training?
138	(and 1 other asset)	Sat		TQ.TRERP	2.	TQ.TRERP.ERFIREPROT.P	195.403(a)(5)	Are the potential causes, types, sizes, and consequences of fire and appropriate use of portable fire extinguishers and other on-site fire control equipment covered in the ER training?
139	(and 1 other asset)	Sat		TQ.TRERP	3.	TQ.TRERP.ERHAZTRAINING.P	195.403(a)(2)	Are the characteristics and hazards of the hazardous liquids or carbon dioxide transported covered in the ER training?
140	(and 1 other asset)	Sat		TQ.TRERP	4.	TQ.TRERP.ERRELEASECONTROL.P	195.403(a)(4)	Are the steps necessary to control any accidental release of hazardous liquid to minimize the potential for fire, explosion, toxicity, or environmental damage identified in the ER training?
141	(and 1 other asset)	Sat		TQ.TRERP	5.	TQ.TRERP.ERTRAINING.P	195.403(a)(1)	Does emergency response training cover the emergency procedures established under 195.402?
142	(and 1 other asset)	Sat		TQ.TRERP	8.	TQ.TRERP.ERTRAININGREVIEW.P	195.403(b)	Does the process require review of emergency response

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 88920

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text
	other asset)							personnel performance at the required frequency?
143	(and 1 other asset)	Sat		TQ.TRERP	10.	TQ.TRERP.ERTRAININGSUPERVISE.P	195.403(c)	Does the process require supervisors be trained on emergency response procedures for which they are responsible?

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

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*Report Parameters: All non-empty Results*

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.

# G1: Intrastate HL O&M 8300

UTC O&M/Procedures Inspection Report  
 Intrastate Hazardous Liquids  
 FORM G1: State-Specific Requirements

**\*\* THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE LIQUIDS OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE PROCEDURES" MODULE IN THE MOST CURRENT IA HAZARDOUS LIQUID QUESTION SET**

## Inspector and Operator Information

Inspection ID 8300	Inspection Link 8300	Inspector - Lead Norwood, Derek	Inspector - Assist 
Operator Seaport Sound Terminal, LLC	Unit Seaport Sound Terminal	Records Location - City & State Tacoma, WA	
Inspection Start Date 04-19-2021	Inspection Exit Interview Date 04-20-2021	Engineer Submit Date 04-22-2021	

You must include the following in your inspection summary:

- \*Inspection Scope
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings

### Inspection Scope and Summary

This inspection was conducted at Seaport Sound Terminal in Tacoma, WA on April 19 and April 20, 2021. The manuals reviewed included O&M procedures, Corrosion Control, Pressure Testing, Emergency Response, Design, Construction and Public Awareness. There were no areas of concern or probable violations found as a result of this inspection.

### Total AFOD

AFOD: 2 days

### Summary of Significant Findings

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

Rob Cohee  
 Pipeline Supervisor  
 (253) 331-7278

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

Edward Luebke  
 4130 E 11th St  
 Tacoma, WA 98421

## Instructions and Ratings Definitions

INSTRUCTIONS	INSPECTION RESULTS		Unanswered Questions	Unanswered Questions List
<b>S - Satisfactory</b>	<b>Satisfactory Responses</b> 34	<b>Satisfactory List</b> 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31,32,33,34,35,	2	36,37
<b>U - Unsatisfactory</b>	<b>Unsatisfactory Responses</b> 0	<b>Unsatisfactory List</b>		
<b>Area Of Concern</b>	<b>Area of Concern Responses</b> 0	<b>Area of Concern List</b>		
<b>N/A- Not Applicable (does)</b>	<b>Not Applicable Responses</b>	<b>Not Applicable List</b> 16,		

not apply to this operator or system) 1

N/C - Not Checked/ Evaluated (was not inspected during this inspection) Not Checked / Evaluated Responses 0 Not Checked / Evaluated List

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the "PROCEDURES: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.

## INTRASTATE LIQUIDS OPERATOR PROCEDURES

## MAPPING PROCEDURES

### Question 1

Do procedures contain instructions in sufficient detail to provide maps, drawings, and records that meet the requirements of WAC 480-75-600? Do the procedures specify a process by which the operator assures the records, maps and operating history documents are up to date and provided to the appropriate operator personnel?

#### Q1 Reference

WAC 480-75-600

#### Q1 Result

Satisfactory

#### Q1 Notes

O&M Section .402(c)(1)

### Question 2

Do procedures require that NPMS submissions are updated every 12 months if system modifications occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

#### Q2 Reference

PHMSA ADB 08-07

#### Q2 Result

Satisfactory

#### Q2 Notes

Subpart B Reporting Requirements Section 11

## REPORTING PROCEDURES

### Question 3

Do the procedures specify in sufficient detail the steps required to comply with telephonic reporting of incidents in accordance with WAC 480-75-630?

#### Q3 Reference

WAC 480-75-630

#### Q3 Result

Satisfactory

#### Q3 Notes

Subpart B Reporting Requirements Section 6

### Question 4

Do procedures require the submission of a written incident report that meets the requirements of WAC 480-75-630(2)?

#### Q4 Reference

WAC 480-75-630(2)

#### Q4 Result

Satisfactory

#### Q4 Notes

Subpart B Reporting Requirements Section 6

### Question 5

Do the procedures specify and describe in sufficient detail the process for reporting to the commission the details of each instance of the following when the company or its contractor observes or becomes aware of either of these events: (a) An excavator digs within thirty-five feet of a transmission pipeline (as defined by RCW 19.122.020) without first obtaining a facilities locate; or (b) A person intentionally damages or removes marks indicating the location or presence of pipeline facilities?

#### Q5 Reference

WAC 480-75-630(6)

#### Q5 Result

Satisfactory

#### Q5 Notes

Subpart B Reporting Requirements Section 6

### Question 6

Do procedures specify the process by which the operator must provide telephonic notification to the commission within 24 hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline facilities?

#### Q6 Reference

WAC 480-75-630(3)

#### Q6 Result

Satisfactory

#### Q6 Notes

Subpart B Reporting Requirements Section 6

### Question 7

Do procedures describe the process for damage reporting requirements outlined in RCW 19.122.053(3) and WAC 480-93-630?

#### Q7 Reference

RCW 19.122.053

#### Q7 Reference 2

WAC 480-75-630(4) and (5)

#### Q7 Result

Satisfactory

#### Q7 Notes

Subpart B Reporting Requirements Section 6

### Question 8

Do procedures require that the operator file with the commission, not later than June 15 of each year, applicable to the preceding calendar year: a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7000.1-1 annual report required by U.S. DOT, Office of Pipeline Safety? Do the procedures require a report titled, "Hazardous Liquid Annual Report Form" which can be obtained from the Pipeline Safety Section of the commission? Do the procedures specify the process in sufficient detail to ensure compliance with content requirements in WAC 480-75-650(2)?

#### Q8 Reference

WAC 480-75-650(2)

#### Q8 Result

Satisfactory

#### Q8 Notes

Subpart B Reporting Requirements Section 2

## DAMAGE PREVENTION PROCEDURES

### Question 9

Are operator's locating and excavation procedures in compliance with all RCW 19.122 requirements for facility operators?

#### Q9 Reference

RCW 19.122

#### Q9 Result

Satisfactory

#### Q9 Notes

Subpart F O&M Section 22

### Question 10

Do the procedures require that the operator provide the following information to excavators who damage 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. Do damage prevention procedures specify that all damage and damage claim records that the operator creates related to damage events must be retained for two years and provided to the commission upon request?

#### Q10 Reference

RCW 19.122

#### Q10 Reference 2

WAC 480-75-630(4) and (5)

#### Q10 Result

Satisfactory

#### Q10 Notes

Subpart B Reporting Requirements Section 6

### Question 11

Does the operator have sufficiently detailed directional drilling/boring procedures that include taking actions necessary to protect their facilities from dangers posed by drilling/boring or other trenchless technologies?

#### Q11 Reference

PHMSA State Programs Emphasis

#### Q11 Result

Satisfactory

#### Q11 Notes

Seaport is on site if any excavation or drilling will be close to their pipeline. Certain parts of the pipeline are >100 feet deep so it is unlikely that the line would be damaged in these areas.

### Question 12

Do procedures include the use of a quality assurance program for monitoring the locating and marking of facilities? Does the procedure require regular field audits of the performance of locators/contractors and implementing appropriate corrective action when necessary? Do procedures include a process to address performance problems through mechanisms such as re-training, process change, or changes in staffing levels?

#### Q12 Reference

PHMSA State Program Question

#### Q12 Result

Satisfactory

#### Q12 Notes

Require photos be sent by contractor (Reconn) for locates that were performed. Review qualifications prior to hiring a contractor.

### Question 13

Do procedures outline a process by which the operator can terminate the flow of hazardous liquid immediately upon receiving information of third party damage? Do the procedures require visual inspection of pipelines involved in an excavation damage and determines whether the damaged line should be replaced or repaired, or whether it is safe to resume pipeline operation?

#### Q13 Reference

RCW 19.122.035

#### Q13 Result

Satisfactory

#### Q13 Notes

ERM Section C

### Question 14

Does the operator have sufficiently detailed procedures that require immediate notification of local first responders and the Department of Ecology for any reportable release of a hazardous liquid from a pipeline? Do the procedures require taking all appropriate steps to ensure public safety in the event of a release of hazardous liquid?

#### Q14 Reference

#### Q14 Result

**Q14 Notes**

Facility Response Plan Section 2

**Question 15**

Does the operator have a sufficiently detailed procedure to review records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

**Q15 Reference**

PHMSA State Programs Emphasis

**Q15 Result**

Satisfactory

**Q15 Notes**

ERM Section N for Post Accident Review

O&amp;M Section 22

## DESIGN/CONSTRUCTION PROCEDURES

**Question 16**

Does the operator's construction procedure specify the requirements for reporting proposed construction projects to the commission at least 45 days prior to the start of any major construction of pipelines intended to be operated at 20% SMYS or more? Does the procedure describe, in sufficient detail, the required content of the proposed construction report consistent with the requirements located in WAC 480-75-610?

**Q16 Reference**

WAC 480-75-610

**Q16 Result**

Not Applicable

**Q16 Notes**

Seaport does not operate pipelines over 20% SMYS

**Question 17**

Does the operator have sufficiently detailed procedures to ensure compliance with all applicable design requirements located in ASME B31.4 "Pipeline Transportation Systems for Liquid Hydrocarbon and Other Liquids."?

**Q17 Reference**

WAC 480-75-350

**Q17 Result**

Satisfactory

**Q17 Notes**

Subpart C Design Requirements Section 7

**Question 18**

Does the operator have sufficiently detailed procedures to ensure that design of its pipeline facilities meet the leak detection system standards found in WAC 480-75-300?

**Q18 Reference**

WAC 480-75-300

**Q18 Result**

Satisfactory

**Q18 Notes**

Subpart F O&amp;M Requirements Section 23 (Leak Detection)

**Question 19**

Does the operator have a sufficiently detailed procedure that requires pipelines are constructed and/or repaired in accordance with ASME B31.4 "Pipeline Transportation Systems for Liquid Hydrocarbons and Other Liquids."? Does the procedure require that longitudinal seams of connecting pipe joints must be offset by at least two inches, and that the longitudinal seams must be located on the upper half of the pipe when laid in an open trench?

**Q19 Reference**

WAC 480-75-450

**Q19 Result**

Satisfactory

**Q19 Notes**

Subpart D Construction Requirements Section 1

**Question 20**

Does the operator's procedure require that design, siting, and construction of pump stations and breakout tanks are performed consistent with the requirements in WAC 480-75-380?

**Q20 Reference**

WAC 480-75-380

**Q20 Result**

Satisfactory

**Q20 Notes**

Subpart C Design Requirements Section 17

**Question 21**

Does the procedure contain sufficient detail to ensure the operator can rapidly locate and isolate all reportable releases from the pipeline? Are valve spacing considerations and applicable surge analysis study processes in accordance with the requirements in WAC 480-75-390?

**Q21 Reference**

WAC 480-75-390

**Q21 Result**

Satisfactory

**Q21 Notes**

Subpart D Construction Requirements Section 22

Subpart C Design Requirements Section 9

**Question 22**

Do design/construction procedures specify the requirement for independent level alarms on systems containing breakout tanks?

**Q22 Reference**  
WAC 480-75-330

**Q22 Result**  
Satisfactory

**Q22 Notes**

Subpart C Design Requirements Section 17

Subpart F O&M Requirements Section 23

**Question 23**

Are the operator's welding, welding qualification, and welding records retention procedures in compliance with the requirements in WAC 480-75-430?

**Q23 Reference**  
WAC 480-75-430

**Q23 Result**  
Satisfactory

**Q23 Notes**

Subpart D Construction Requirements Section 8

**Question 24**

Does the operator's procedure require that all new girth welds on new or repaired sections of pipe be inspected by radiography or ultrasonic testing as described in API 1104? Do the procedures require the operator to keep a log of each weld inspected and maintain inspection records for the life of the pipeline in accordance with WAC 480-75-460?

**Q24 Reference**  
WAC 480-75-460

**Q24 Result**  
Satisfactory

**Q24 Notes**

Subpart D Construction Requirements Section 8

**Question 25**

Does the operator's procedure require completion and approval of a study consistent with requirements found in WAC 480-75-500 prior to moving or lowering any hazardous liquid line pipe? Does the procedure specify requirements to include pipe stress calculations based on API RP 1117 "Movement of In-Service Pipelines"? Does the procedure require retention of a copy of the study for the life of the pipeline?

**Q25 Reference**  
WAC 480-75-500

**Q25 Result**  
Satisfactory

**Q25 Notes**

Subpart F O&M Requirements Section 13

## CORROSION CONTROL PROCEDURES

**Question 26**

Does the operator's procedure ensure that prior to backfilling, all new coated pipe is inspected using a holiday detector in accordance with the requirements outlined in WAC 480-75-410?

**Q26 Reference**  
WAC 480-75-410

**Q26 Result**  
Satisfactory

**Q26 Notes**

Subpart H Corrosion Control Requirement Section 4

**Question 27**

Do cathodic protection procedures ensure compliance with WAC 480-75-340 requirements to ensure CP test stations and other electrical contact points are located at pipe casings and at locations sufficient to facilitate cathodic protection testing?

**Q27 Reference**  
WAC 480-75-340

**Q27 Result**  
Satisfactory

**Q27 Notes**

Subpart H Corrosion Control Requirement Section 7

**Question 28**

Do the operator's corrosion control procedures require the company to initiate remedial action as necessary to correct any deficiency observed during corrosion monitoring within 90 days after detecting the deficiency?

**Q28 Reference**  
WAC 480-75-510

**Q28 Result**  
Satisfactory

**Q28 Notes**

Subpart H Corrosion Control Requirement Section 10

Remedial Action table outlines timeframes and actions

**Question 29**

Does the operator's procedure require inspections/examinations for evidence of mechanical damage or external corrosion during excavation, or whenever a pipe is exposed for any reason? Does procedure require inspection of pipe coating for damage? Does the procedure require repair of all coating damage prior to reburied?



the pipe? Does the procedure specify actions to take if active corrosion, general corrosion, or corrosion that has caused a leak is found, consistent with the requirements in WAC 480-75-520? Does the procedure require retention of corrosion inspection report records for the life of the pipeline?

**Q29 Reference**  
WAC 480-75-520

**Q29 Result**  
Satisfactory

**Q29 Notes**

Subpart H Corrosion Control Requirement Section 8 and Appendix A-10 (Exposed Pipe Visual Inspection)

## OPERATIONS & MAINTENANCE PROCEDURES

**Question 30**

Does the operator have sufficiently detailed procedures for pressure testing and test records composition/retention requirements to ensure compliance with WAC 480-75-420?

**Q30 Reference**  
WAC 480-75-420

**Q30 Result**  
Satisfactory

**Q30 Notes**

Subpart E Pressure Testing Requirements Section 8

**Question 31**

Do hydrotesting procedures specify that if the operator uses pressure testing as part of an effort to increase maximum operating pressure (MOP), the operator must initiate a report to the commission at least forty-five (45) days prior to pressure testing? Do the procedures identify the required components of this report consistent with requirements in WAC 480-75-620?

**Q31 Reference**  
WAC 480-75-620

**Q31 Result**  
Satisfactory

**Q31 Notes**

Subpart F O&M Requirements Section 6

**Question 32**

Does the procedure contain processes in sufficient detail to ensure compliance with the requirements in WAC 480-75-550 to reevaluate its maximum operating pressure when there is a change in class location? Does the procedure specify the periodic reevaluation interval is not to exceed five (5) years?

**Q32 Reference**  
WAC 480-75-550

**Q32 Result**  
Satisfactory

**Q32 Notes**

Subpart F O&M Requirements Section 21 (Public Awareness)

**Question 33**

Does the operator have sufficiently detailed procedures for emplacement of proper pipeline markers, to include specific instructions for emplacement of markers for pipelines attached to bridges or other spans? Do the procedures require inspection of each marker annually, and replacement of any damaged or missing marker within thirty days of inspection?

**Q33 Reference**  
WAC 480-75-540

**Q33 Result**  
Satisfactory

**Q33 Notes**

Subpart F O&M Requirements Section 8

Appendix 1.4

**Question 34**

Do the operators procedures specify, for pipelines constructed after April 1, 1970, the operator must conduct depth-of-cover surveys within their rights of way every five (5) years to ensure minimum depth of cover as required by WAC 480-75-640? Do the procedures require that in areas subject to erosion or subsiding, the survey must be conducted every three (3) years?

**Q34 Reference**  
WAC 480-75-640

**Q34 Result**  
Satisfactory

**Q34 Notes**

Targa Depth of Cover Survey procedure from 2017 reviewed

**Question 35**

Does the operator's procedure require scheduling of rights-of-way inspections at least once each calendar week in accordance with the requirements in WAC 480-75-530?

**Q35 Reference**  
WAC 480-75-530

**Q35 Result**  
Satisfactory

**Q35 Notes**

Subpart F O&M Requirements Section 9

Frequency: Patrols will be conducted at least once each calendar week.

## PROCEDURES: SUMMARY OF REQUIRED COMMENTS

**PROCEDURE 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.

## ADDITIONAL HEADER TEMPLATE

### Question 36

template for additional question

#### Q36 Reference

WAC 480-93-015

#### Q36 Result

#### Q36 Notes

### Question 37

Template for additional questions

#### Q37 Reference

WAC 480-75-330

#### Q37 Result

#### Q37 Notes

Comments Template for additional comment boxes