

# Form A- Annual Review 8303

UTC Standard Annual Review Inspection Report  
 Intrastate Operators  
 FORM A: Annual Review

## Inspector and Operator Information

<b>Inspection ID</b> 8303	<b>Inspection Link</b> 8303	<b>Inspector - Lead</b> Derek Norwood	<b>Inspector - Assist</b> 
<b>Operator</b> Seaport Sound Terminal, LLC	<b>Unit</b> Seaport Sound Terminal	<b>Records Location - City &amp; State</b> Tacoma, WA	
<b>Inspection Start Date</b> 08-10-2021	<b>Inspection Exit Interview Date</b> 08-10-2021	<b>Engineer Submit Date</b> 	

## Inspection Summary

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**  
 The inspection was completed at Seaport Sound Terminal's Office in Tacoma. It included a review of revisions to O&M, Integrity Management, OQ and PA procedures. We also reviewed data surrounding the most recent ILL and annual reports from 2019 and 2020.

**Facilities visited and Total AFOD**  
 Seaport Sound Terminal, Tacoma  
 1 AFOD

**Summary of Significant Findings**  
 (DO NOT Discuss Enforcement options)  
 There were no findings 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

**INSPECTION RESULTS: Annual Review**

<b>Satisfactory Responses</b> 19	<b>Satisfactory List</b> 1,3,9,10,12,13,14,15,16,17,18,24,26,27,29,30,31,32,	<b>Number of Unanswered Questions</b> 0	<b>Unanswered List</b> 
<b>Unsatisfactory Responses</b> 0	<b>Unsatisfactory List</b> 		
<b>Area of Concern Responses</b> 0	<b>Area of Concern List</b> 		
<b>Not Applicable Responses</b> 21	<b>Not Applicable List</b> 4,5,6,7,8,19,20,21,22,23,25,28,35,37,38,39,40,41,42,43,44		
<b>Yes Responses</b> 0	<b>Yes List</b> 	<b>No Responses</b> 2	<b>No List</b> 34,36,
<b>Not Checked / Evaluated Responses</b> 0	<b>Not Checked / Evaluated List</b> 		

\*\*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 also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

## Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
No crew inspections found						

## Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
No facility inspections found						

## Scheduled Inspection History

**Annual Review Inspection History**

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
<b>Seaport Sound Terminal, LLC (13 Inspections)</b>								
2021	Seaport Sound Terminal, LLC	Seaport Sound Terminal	8299	Standard Comprehensive - HL	Pending			Documents

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
2021	Seaport Sound Terminal, LLC	Seaport Sound Terminal	8300	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	05-05-2021	04-20-2025	Documents
2021	Seaport Sound Terminal, LLC	Seaport Sound Terminal	8301	DA - Drug & Alcohol	Complete	04-26-2021	04-20-2025	Documents
2021	Seaport Sound Terminal, LLC	Seaport Sound Terminal	8302	LIMP - Liquid Transmission Integrity Management	Pending			Documents
2021	Seaport Sound Terminal, LLC	Seaport Sound Terminal	8303	Standard - Annual Review	In the Workflow		08-10-2022	Documents
2019	Seaport Sound Terminal, LLC	Seaport Sound Terminal	7854	CRM - LIQUID	Complete	10-23-2019	08-28-2023	Documents
2019	Seaport Sound Terminal, LLC	Seaport Sound Terminal	7855	Standard - Annual Review	Complete	10-24-2019	08-28-2020	Documents
2018	Seaport Sound Terminal, LLC	Seaport Sound Terminal	7562	LIMP - Liquid Transmission Integrity Management	Complete	11-13-2018	09-11-2021	Documents
2018	Seaport Sound Terminal, LLC	Seaport Sound Terminal	7579	OQ - Operator Qualification	Complete	10-12-2018	09-25-2022	Documents
2018	Seaport Sound Terminal, LLC	Seaport Sound Terminal	7581	Standard Comprehensive - HL	Complete	11-13-2018	09-26-2021	Documents
2018	Seaport Sound Terminal, LLC	Seaport Sound Terminal	7769	PA - Public Awareness	Complete	10-05-2018	09-25-2022	Documents
2016	Seaport Sound Terminal, LLC	Seaport Sound Terminal	6772	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	05-26-2016	05-17-2020	Documents
2015	Seaport Sound Terminal, LLC	Seaport Sound Terminal	6207	Standard Comprehensive - HL	Complete	02-05-2016	11-04-2018	Documents

## GAS System Operations History

### Annual Report - Miles of Main

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No reports found				

### Annual Report GAS Transmission Miles

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
No reports found		

### Annual Report - Leaks

Year	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
No reports found					

### Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
No reports found							

## HL System Operations History

### HL Annual Report - Miles of Pipe by Decade

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre-20s	1920-1929	1930-1939	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009
2019	Seaport Sound Terminal, LLC	Refined and/or Petroleum (non-HVL)	2.78											

### HL Annual Report - HL Miles / HCAs

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
2019	Seaport Sound Terminal, LLC	Refined and/or Petroleum (non-HVL)	2.78	2.78				2.78

### HL Annual Report - Breakout Tanks

YEAR	Operator	Commodity Group	Crude Oil #5	Refined (non HVL) #5	HVL #5	CO2 #5	F Gr
Seaport Sound Terminal, LLC (1 Report)							
2019	Seaport Sound Terminal, LLC	Refined and/or Petroleum (non-HVL)	0	1	0	0	

## ANNUAL REPORT: ACCURACY/TRENDS

**Question #1.** Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe. **1. Result** Satisfactory

**1. Notes**  
Reviewed annual reports for 2019 and 2020. No changes in pipe data (e.g. mileage, diameter, MOP). The 2020 annual report included ILI data for a MFL tool and deformation tool run.

### Access to Complete Distribution Annual Report

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No reports found				

### Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
No reports found			

### Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group
2019	Seaport Sound Terminal, LLC	Refined and/or Petroleum (non-HVL)

## DAMAGE PREVENTION

### Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services
No damages found															

DIRT data on mismarks for prior year

DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

Damage Cause	Number of Reports	SubmitCompanyID - UTCfinalName	Number of Reports
No records found		No records found	

**Question #2.**

Review the following damage prevention items:

<b>Q2. Is the damage prevention information in the annual report complete?</b> http://Seaport has had no damages to their pipeline	<b>Q2.b. Is the annual report damages root cause information complete and accurate?</b> N/A	<b>Q2.c. Does the operator have a process to evaluate the cause of "One-call notification not sufficient" category?</b> N/A
<b>Q2.d. Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?</b> N/A	<b>Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?</b> N/A	<b>Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?</b> N/A
<b>Q2.g. What is the number of damages resulting from mismarks?</b> N/A	<b>Q2.h. What is the number of damages resulting from not locating within the time requirements?</b> N/A	<b>Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?</b> N/A
<b>Q2.j. Are mapping corrections timely and according to written procedures?</b> N/A	<b>Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?</b> N/A	<b>Q2.L. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?</b> N/A

**2. Notes**

Seaport had none of these events on their annual report because they have had no damages to their line.

**NPMS SUBMISSIONS/CHANGES**

**Question #3.**

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission? Satisfactory

**3. Result**

**3. Notes**

Seaport submitted for 2019 and 2020 that there were no changes.

**INCIDENT/SRC/AOC REPORTS REVIEW**

**Question #4**

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

**4. Results**

Not Applicable

**4. Notes**

Seaport has had no federally reportable incidents

**Q4: Federally reportable incidents**

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No incident notifications found									

**Question #5.**

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Result**

Not Applicable

**5. Notes**

Seaport has had no incidents of third party damage or leaks.

**Question #6.**

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
No incident notifications found						

**6. Result**

Not Applicable

**6. Notes**

No incidents

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No incident notifications found							

**7. Result**

Not Applicable

**7. Notes**

No SRCs

**Question #8.**

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**

Not Applicable

**8. Notes**

Seaport has had no abnormal operations

**O&M & EMERGENCY PROGRAMS**

**Question #9.**

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

**9. Result**

Satisfactory

**9. Notes**

The current version of the manual is the first revision for Seaport. Staff performed full O&M review in April 2021. There were no findings from that inspection There have been only minor revisions such as formatting since that inspection.

**Question #10.**

If changes to the O&M were made, are changes acceptable?

**10. Result**

Satisfactory

**10. Notes**

**Question #11.**

Were emergency plans changed during the previous year?

**11. Result**

Satisfactory

**11. Notes**

Emergency Response Action Plan has been made into it's own document. Previously was an appendix in the Facility Response Plan. Updated geographical response plan based on ecology recommendations. Pipeline emergency response has not changed.

**Question #12.**

Were any changes to emergency plans satisfactory?

**12. Result**

Satisfactory

**12. Notes**

Emergency Response Action Plan has been made into its own document. Previously was an appendix in the Facility Response Plan. Updated geographical response plan based on ecology recommendations. Pipeline emergency response has not changed.

**INTEGRITY MANAGEMENT PROGRAMS**

**Question #13** **13. Result**  
Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)? Satisfactory

**13. Notes**

Made a transition from Targa to Transmontaigne to Seaport. The have been no content revisions since 2018

**Question #14.** **14. Result**  
Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)? Satisfactory

**14. Notes**

Performance Evaluation performed in 2020 identifying in change in pipe operating conditions. No changes identified that would require revision of IMP

**Question #15** **15. Result**  
Are IMP program changes acceptable? Satisfactory

**15. Notes**

**Question #16** **16. Results**  
Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities) Satisfactory

**16. Notes**

ILI performed in October 2020, based on the ILI there were no immediate repair conditions identified. A vendor (Integrity Solutions) will perform in-depth analysis to identify Anomaly Dig Sheets, ILI profiles and a post assessment report.

**Question #17** **17. Results**  
Does the operator's HCA location data correspond to the positional data located in UTC GIS? Satisfactory

**17. Notes**

UTC maps look to be consistent with Seaport data and they have had no changes since initial construction. Seaport classifies the entire pipeline as an HCA which is consistent with field observations. The entire pipeline is along rivers and the puget sound and is classified as an HCA.

**Question #18** **18. Results**  
What assessment work is planned for the upcoming year? Satisfactory

**18. Notes**

ILI was performed in 2020 and Seaport will be using a vendor to analyze the data to determine need for confirmation and/or anomaly digs. No assessments are scheduled to be performed in 2021

**Question #19** **19. Results**  
Within the operator's DIMP, are low pressure systems evaluated for overpressure threats? Not Applicable

**19. Notes**

Seaport is not a distribution operator.

**Question #20** **20. Results**  
Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section) Not Applicable

**20. Notes**

Seaport is not a distribution operator.

**Question #21** **21. Results**  
Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans? Not Applicable

**21. Notes**

Seaport is not a distribution operator.

**Question #22** **22. Results**  
Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities) Not Applicable

**22. Notes**

Seaport is not a distribution operator.

**Question #23** **23. Results**  
What DIMP remediation work is anticipated for upcoming year? Not Applicable

**23. Notes**

Seaport is not a distribution operator.

**OQ PROGRAM**

**Question #24** **24. Results**  
Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe. Satisfactory

**24. Notes**

Last Revision was September 2020, Seaport performed a program review in July 2021 but no changes were necessary

**Question #25** **25. Results**  
Are the OQ plan updates satisfactory? Not Applicable

**25. Notes**

No changes

**Question #26** **26. Results**  
Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan? Satisfactory

**26. Notes**

Reviewed Veriforce OQs, CBTs performed and field evals done by Seaport. All OQs were up-to-date

**PUBLIC AWARENESS PROGRAM**

**Question #27** **27. Results**  
Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year? Satisfactory

**27. Notes**

No changes

**Question #28** **28. Results**  
Are changes to the PA program satisfactory? Not Applicable

**28. Notes**

**CONTROL ROOM PROGRAM**

**Question #29** **29. Results**  
Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year? Satisfactory

**29. Notes**

Adopted some forms from TransMontaigne but the rest of the program has remained unchanged since the line was operated by Targa. Revised March 2021 and will be reviewed early next year

**Question #30** **30. Results**  
Are the CRM program changes satisfactory? Satisfactory

**30. Notes**

## SAFETY MANAGEMENT SYSTEM API 1173

**Question #31** **31. Results**  
Is the operator developing and implementing an API 1173 Safety Management System? Satisfactory

**31. Notes**

Seaport has purchased a copy of API 1173 and has begun reviewing to see if any policies are currently in line with the RP.

## INSPECTOR ASSESSMENT OF INSPECTION UNITS

**Question #32** **32. Results**  
Are inspection units broken down appropriately? Do you recommend any changes to inspection units? Satisfactory

**32. Notes**

**Q32: List of current inspection units**

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID
<b>Seaport Sound Terminal, LLC (1 Unit)</b>			
Seaport Sound Terminal	Hazardous Liquid	Intrastate	Liquid

## OPERATOR'S PUBLIC WEB PAGE

**Question #33** **33. Results**  
For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

**33. Notes**

N/A

Seaport does not have a public website.

## ADVISORY BULLETIN REVIEW

**Question #34**  
Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

**ADB 2019-01** **34. Results**  
ADB 2019-01 Flood Mitigation NO

**34. Notes**

Based on depth of pipe and history of the river, the risk of flooding is low. River has been diked so risk of channel migration or scour is low.

**Question #35**  
If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

**ADB 2019-01** **35. Results**  
ADB 2019-01: Flood Mitigation Not Applicable

**35. Notes**

According to Seaport, these risks are low.

**Question #36**  
Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

**ADB 2019-02** **36. Results**  
ADB 2019-02: Earth Movement/Geological Hazards NO

**36. Notes**

Study performed when the pipeline was built. Study done by Geotechnical Engineering Services. No specific risks related to floods, unstable soil, landslides, etc. were called out in the report.

**Question #37**  
If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

**ADB 2019-02** **37. Results**  
ADB 2019-02: Earth Movement/Geological Hazards Not Applicable

**37. Notes**

Based on study when the line was built and operation history, these risks are low.

**Question #38**  
Does the operator have any indoor meter sets or regulators in their system?

**ADB 2020-01** **38. Results**  
ADB 2020-01 Inside Meter Sets Not Applicable

**38. Notes**

Seaport is not a distribution operator.

**Question #39**  
If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

**ADB 2020-01** **39. Results**  
ADB 2020-01 Inside Meter Sets Not Applicable

**39. Notes**

Seaport is not a distribution operator.

**Question #40**  
Does the operator have a detailed record of locations for all indoor meter sets/regulators within their system?

**ADB 2020-01** **40. Results**  
ADB 2020-01 Inside Meter Sets Not Applicable

**40. Notes**

Seaport is not a distribution operator.

**Question #41**  
Does the operator have any low pressure systems?

**ADB 2020-02** **41. Results**  
ADB 2020-02 Low Pressure Systems Not Applicable

**41. Notes**

Seaport is not a distribution operator.

**Question #42**

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**42. Results**

Not Applicable

**42. Notes**

Seaport is not a distribution operator.

**Question #43**

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**43. Results**

Not Applicable

**43. Notes**

Seaport is not a distribution operator.

**Question #44**

Does the operator include all low-pressure system risks in their DIMP program appropriately?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**44. Results**

Not Applicable

**44. Notes**

Seaport is not a distribution operator.

**SUMMARY OF REQUIRED COMMENTS**

**COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.**

The inspection was completed at Seaport Sound Terminal's Office in Tacoma. It included a review of revisions to O&M, Integrity Management, OQ and PA procedures. We also reviewed data surrounding the most recent I/I and annual reports from 2019 and 2020.