

Inspection Output (IOR)

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Inspection Information

Inspection Name	8288 Nouryon Standard Comprehensive	Operator(s)	NOURYON PULP AND PERFORMANCE CHEMICALS LLC (32358)	Plan Submitted	08/16/2021
Status	PLANNED	Lead	Dennis Ritter	Plan Approval	08/17/2021 by Sean Mayo
Start Year	2021	Team Members	Darren Tinnerstet, Rell Koizumi	All Activity Start	10/11/2021
System Type	GT	Observer(s)	Scott Rukke, David Cullom, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson	All Activity End	10/13/2021
Protocol Set ID	WA.GT.2021.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This is a standard inspection of Nouryon (formerly Akzo Nobel) Pulp and Performance Chemicals LLC's 8-inch polyethylene transmission pipeline located in Grant County WA. Nouryon is located at 2701 Road "N" N.E. Moses Lake Washington. The Company operates 0.45 miles of unodorized, hydrogen transmission line beginning at the Nouryon facility and ending at the JR Simplot potato processing facility located at 14124 Wheeler Road N.E. Moses Lake WA. The line is mostly on private property except where it crosses the public right of way at Wheeler Rd.

The records portion of this inspection was conducted virtually using MS Teams due to Covid-19 protocols currently in place in WA. The inspection was formatted in IA for the WA.GT.2101.01 protocol question set and augmented using WUTC Form D for WA intrastate GT lines. One field day for site inspection was conducted on November 2, 2021 in keeping with Covid-19 requirements. The inspection included a review of onsite documents, OQs, and field inspection of pipeline.

Facilities visited and Total AFOD

10/12/21-Begin records inspection via TEAMS. Records review using IA WA.GT.2101.01 protocol question set and Records review using WUTC Form D for WA intrastate GT 1 AFOD

10/13/21-Complete records review and follow up questions 0.1 AFOD

11/1/21-Nouryon field--travel to Moses Lake WA 0.4 AFOD

11/2/21-Nouryon field-- Moses Lake WA: inspect pipeline valves, right of way conditions, confirm class location, markers, casing vents and OQ. **Exit interview** at Nouryon 14:00 with Jacob St. Mary and Stephen Hernandez 1 AFOD

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

The records review revealed the following issues: 1) Nouryon did not have records for conducting emergency response training in 2018 and 2020; 2) Nouryon did not have records showing an annual review of the written procedures or processes in the O&M manual was conducted in 2019. 3) Nouryon does not conduct atmospheric corrosion inspections with qualified individuals on the two isolation valves on each end of the pipeline-V5601 and V5602.

Primary Operator contacts and/or participants

Stephen Hernandez, Director of Operations

FR Compliance Group, Denver CO

(720) 647-3147

Operator executive contact and mailing address for any official correspondence

Jacob St. Mary, HSES Manager

1775 W Oak Commons Ct

Marietta, Georgia 30062

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	86235 (1852)	NOURYON PULP & PERFORMANCE CHEMICALS LLC	unit	86235	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe AMAOP CDA Aluminum/Amphoteric Abandoned	79	79	79	79	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.	86235 (1852)	Baseline Records (Form 1), Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail	
2.	86235 (1852)	n/a	TQ.PROT9	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Records and Field	--	10/11/2021	10/13/2021	n/a	all planned questions	all assets	all types	79	79	79	79	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	Records and Field	COMPLETED	11/04/2021	Records and Field	86235 (1852)

Results (Unsat,Concern values, 3 results)

MO.GO: Gas Pipeline Operations

1. Question Result, ID, References **Unsat, MO.GO.OMANNUALREVIEW.R, 192.605(a)**

Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*

Assets Covered **86235 (1852)**

Result Issue Summary **The 2019 review could not be produced during the inspection. It appears this annual review may not have been done as it was during the ownership transition from Akzo Nobel to Nouryon. However, the 2020 review was completed by the Compliance Group (consultant for Nouryon). The remedy for not completing the required review was to actually get the review completed. This was accomplished in 2020.**

Standard Issues **C (Documentation/administrative - no significant impact) : 192.605(a) : Records indicate requirement not completed at required intervals.**

Result Notes **Form 2 of the O&M is annual review/revision sheet. Has revision starting in 2008. Latest revision is May 14, 2021. New manual from Compliance Group created in May of 2020.**

Revision from 2013 to 2018 completed by Consentino Consulting. Compliance Group took over in 2020.

In October of 2018 Akzo Nobel sold to Nouryon. It appears a 2019 review was not completed or a record does not exist.

TQ.PROT9: OQ Protocol 9

2. Question Result, ID, References **Unsat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered **86235 (1852)**

Result Issue Summary **The two isolation valves on each end of the PE transmission line are made of steel. They provide the ability to isolate the system during an emergency and should be treated as regulated assets. Prior inspections did not include these valves as part of the regulated system and the operator therefore did not perform atmospheric corrosion inspection with qualified personnel (even though Nouryon does inspect them for corrosion product annually). After inspecting the valves, there is no evidence of corrosion and we believe Nouryon should include these valves in a 3-year atmospheric corrosion inspection cycle to meet code requirements.**

Standard Issues **C (Documentation/administrative - no significant impact) : 192.801(a) : Issue not covered in standard items. See Issue Summary text for details.**

Result Notes **Current employees are not OQ'd to inspect atmospheric corrosion on pipelines.**

TQ.TR: Training of Personnel

3. Question Result, ID, References **Unsat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))**

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

Assets Covered **86235 (1852)**

Result Issue Summary **Records indicating training has occurred for emergency response for years 2019 and 2020 were not found during the inspection. Section 19 of the O&M manual is Nouryon's Emergency Response Plan. Section 19.1 notes training will occur "periodically" to ensure employees are knowledgeable of the procedures and training is effective. Periodically is not defined. Nouryon should define the timeframe for when employees are trained to ensure they remain knowledgeable and can effectively carry out the plan.**

Standard Issues **C (Documentation/administrative - no significant impact) : 192.615(b)(2) : Records indicate requirement not completed at required intervals.**

Result Notes **No records for 2018 or 2020 for emergency response training. Reviewed Moses Lake LEPC Winter HAZMAT Table Top exercise from Dec 11, 2019. Oct 2021 HAZMAT exercise.**

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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• 86235 (1852) (87)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
1.	(and 1 other asset)	Sat	AR.PTI	4.	AR.PTI.PRESSTESTRESULT.R	192.517(a), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2)	Do the test records validate the pressure test?
2.	(and 1 other asset)	Sat	AR.RMP	5.	AR.RMP.IGNITION.O	192.751(a), 192.751(b), 192.751(c)	Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.
3.	(and 1 other asset)	NA	AR.RMP	25.	AR.RMP.WELDTTEST.O	192.719(a), 192.719(b)	Does the operator properly test replacement pipe and repairs made by welding on transmission lines?
4.	(and 1 other asset)	NA	DC.CO	51.	DC.CO.CLEAR.R	192.325(a), 192.325(b), 192.325(c), 192.325(d)	Do records indicate that transmission lines or mains are installed with clearances specified in 192.325, and (if plastic) installed as to prevent heat damage to the pipe?
5.	(and 1 other asset)	Sat	DC.CO	54.	DC.CO.COVERONSHORE.R	192.327(a), 192.327(b), 192.327(c), 192.327(d), 192.327(e)	Is onshore piping minimum cover provided as specified in 192.327?
6.	(and 1 other asset)	NA	DC.WELDINS	2.	DC.WELDINS.WELDVISUALQUAL.R	192.241, 192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)	Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?
7.	(and 1 other asset)	NA	DC.WELDINS	5.	DC.WELDINS.WELDNDT.R	192.243	Do records indicate that NDT and interpretation are in accordance with 192.243?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
8.	(and 1 other asset)	NA	DC.WELDPROCEDURE	2.	DC.WELDPROCEDURE.WELD.R	192.225	Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?
9.	(and 1 other asset)	Sat	DC.DPC	27.	DC.DPC.VALVESPACE.O	192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))	Are transmission line valves being installed as required by 192.179?
10.	(and 1 other asset)	NA	DC.DPC	49.	DC.DPC.INTCORRODE.R	192.476(d) (192.476(b), 192.476(c), 192.476(a))	Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?
11.	(and 1 other asset)	Sat	DC.DPC	50.	DC.DPC.INTCORRODE.O	192.476(a) (192.476(b), 192.476(c))	Does the transmission project's design and construction comply with 192.476?
12.	(and 1 other asset)	NA	DC.MO	6.	DC.MO.MAOPLIMIT.O	192.605(b)(5)	During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?
13.	(and 1 other asset)	NA	EP.ERG	20.	EP.ERG.POSTEVTREVIEW.R	192.605(a) (192.615(b)(1), 192.615(b)(3))	Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?
14.	(and 1 other asset)	Sat	(2) EP.ERG	22.	EP.ERG.LIAISON.R	192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
15.	(and 1 other asset)	NA	MO.GC	2.	MO.GC.CONVERSION.R	192.14(a) (192.14(b))	Do records indicate the process was followed for converting any pipelines into Part 192 service?
16.	(and 1 other asset)	NA	MO.GOABNORMAL	2.	MO.GOABNORMAL.ABNORMAL.R	192.605(a) (192.605(c)(1))	Did personnel respond to indications of abnormal operations as required by the process?
17.	(and 1 other asset)	NA	MO.GOABNORMAL	6.	MO.GOABNORMAL.ABNORMALREVIEW.R	192.605(a) (192.605(c)(4))	Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?
18.	(and 1 other asset)	NA	MO.GOCLASS	6.	MO.GOCLASS.CLASSLOCATESTUDY.R	192.605(b)(1) (192.609(a), 192.609(b), 192.609(c),	Do records indicate performance of the required study whenever the population along a

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Asset	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
Number	Sub-Group	Text		Text			
						192.609(d), 192.609(e), 192.609(f)	pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?
19.	(and 1 other asset)	Sat	(2)	MO.GOCCLASS	8. MO.GO.CONTSURVEILLANCE.O	192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))	Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?
20.	(and 1 other asset)	Sat		MO.GOMAOP	3. MO.GOMAOP.MAOPDETERMINE.R	192.709(c) (192.619(a), 192.619(b))	Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?
21.	(and 1 other asset)	Sat	(2)	MO.GM	4. MO.GM.RECORDS.R	192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))	Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?
22.	(and 1 other asset)	Sat		MO.GM	6. MO.GM.IGNITION.R	192.709 (192.751(a), 192.751(b), 192.751(c))	Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?
23.	(and 1 other asset)	Sat		MO.GM	10. MO.GM.VALVEINSPECT.R	192.709(c) (192.745(a), 192.745(b))	Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?
24.	(and 1 other asset)	NA		MO.GM	11. MO.GM.VALVEINSPECT.O	192.745(a) (192.745(b))	Are field inspection and partial operation of transmission line valves adequate?
25.	(and 1 other asset)	NA		MO.GM	18. MO.GM.EQUIPPLASTICJOINT.R	192.603(b) (192.756)	Do records indicate equipment used in joining plastic pipe was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?
26.	(and 1 other asset)	NA		MO.GM	19. MO.GM.EQUIPPLASTICJOINT.O	192.756	Is proper maintenance being performed on equipment used in joining plastic pipe in accordance with the manufacturer's

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text	
							recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?	
27.	(and 1 other asset)	NA	MO.GOODOR	2.	MO.GOODOR.ODORIZE.R	192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))	Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?	
28.	(and 1 other asset)	Sat	(2)	MO.GO	3.	MO.GO.CONTSURVEILLANCE.O	192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))	Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?
29.	(and 1 other asset)	Unsat		MO.GO	6.	MO.GO.OMANNUALREVIEW.R	192.605(a)	Has the operator conducted annual reviews of the written procedures or processes in the manual as required?
30.	(and 1 other asset)	Sat		MO.GO	8.	MO.GO.OMEFFECTREVIEW.R	192.605(a) (192.605(b)(8))	Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?
31.	(and 1 other asset)	Sat		MO.GO	10.	MO.GO.OMHISTORY.R	192.605(a) (192.605(b)(3))	Are construction records, maps, and operating history available to appropriate operating personnel?
32.	(and 1 other asset)	Sat		MO.GO	11.	MO.GO.OMHISTORY.O	192.605(b)(3)	Are construction records, maps and operating history available to appropriate operating personnel?
33.	(and 1 other asset)	NA		MO.GO	18.	MO.GO.UPRATE.R	192.553(b) (192.553(a), 192.553(c), 192.553(d))	Do records indicate the pressure uprating process was implemented per the requirements of 192.553?
34.	(and 1 other asset)	NA		MO.GMOPP	2.	MO.GMOPP.PRESSREGCAP.R	192.709(c) (192.743(a), 192.743(b), 192.743(c))	Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?
35.	(and 1 other asset)	Sat	(2)	MO.GMOPP	3.	MO.GM.RECORDS.R	192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))	Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note 1)		Sub-Group	Question #	Question ID	References	Question Text
								patrol, survey, inspection or test?
36.	(and 1 other asset)	NA		MO.GMOPP	5.	MO.GMOPP.PRESSREGTEST.R	192.709(c) (192.739(a), 192.739(b))	Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?
37.	(and 1 other asset)	NA		MO.GMOPP	6.	MO.GMOPP.PRESSREGTEST.O	192.739(a) (192.739(b), 192.743)	Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?
38.	(and 1 other asset)	Sat	(2)	MO.RW	2.	MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
39.	(and 1 other asset)	Sat	(2)	MO.RW	3.	MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?
40.	(and 1 other asset)	Sat	(2)	MO.RW	4.	MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?
41.	(and 1 other asset)	Sat		MO.RW	9.	MO.RW.LEAKAGE.R	192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))	Do records indicate leakage surveys conducted as required?
42.	(and 1 other asset)	Sat		PD.DP	7.	PD.DP.PDPROGRAM.R	192.614(c)	Does the damage prevention program meet minimum requirements specified in 192.614(c)?
43.	(and 1 other asset)	Sat	(2)	PD.PA	11.	EP.ERG.LIAISON.R	192.605(a) (192.615(c)(1) , 192.615(c)(2) , 192.615(c)(3) , 192.615(c)(4) , 192.616(c), ADB-05-03)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
44.	(and 1 other asset)	Sat		PD.PA	13.	PD.PA.LANGUAGE.R	192.616(g) (API RP 1162 Section 2.3.1)	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?
45.	(and 1 other asset)	Sat	(2)	PD.RW	2.	MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
46.	(and 1 other asset)	Sat	(2)	PD.RW	3.	MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?
47.	(and 1 other asset)	Sat	(2)	PD.RW	4.	MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Asset	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text
48.	(and 1 other asset)	Sat	RPT.RR	1.	RPT.RR.ANNUALREPORT.R	191.17(a)	Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?
49.	(and 1 other asset)	NA	RPT.RR	5.	RPT.RR.IMMEDREPORT.R	191.5(a) (191.7(a))	Do records indicate immediate notifications of incidents were made in accordance with 191.5?
50.	(and 1 other asset)	NA	RPT.RR	10.	RPT.RR.INCIDENTREPORT.R	191.15(a) (192.624(a)(1)), 192.624(a)(2))	Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?
51.	(and 1 other asset)	NA	RPT.RR	11.	RPT.RR.INCIDENTREPORTSUPP.R	191.15(d)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe using the most recent Form?
52.	(and 1 other asset)	NA	RPT.RR	15.	RPT.RR.SRCR.R	191.23(a) (191.23(b)), 191.25(a), 191.25(b), 191.25(c))	Do records indicate safety-related condition reports were filed as required?
53.	(and 1 other asset)	Sat	RPT.RR	20.	RPT.RR.NPMSANNUAL.R	191.29(a) (191.29(b))	Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?
54.	(and 1 other asset)	Sat	RPT.RR	23.	RPT.RR.OPID.R	191.22(a) (191.22(c)), 191.22(d))	Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?
55.	(and 1 other asset)	Sat	TD.ATM	4.	TD.ATM.ATMCORRODEINSP.R	192.491(c) (192.481(a), 192.481(b), 192.481(c))	Do records document inspection of aboveground pipe for atmospheric corrosion?
56.	(and 1 other asset)	NA	TD.ATM	5.	TD.ATM.ATMCORRODEINSP.O	192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))	Is pipe that is exposed to atmospheric corrosion protected?
57.	(and 1 other asset)	NA	TD.CPMONITOR	2.	TD.CPMONITOR.CURRENTTEST.R	192.491(c) (192.465(b))	Do records document details of electrical checks of sources of rectifiers or

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text	
w	s	t		t #				
							other impressed current sources?	
58.	(and 1 other asset)	NA		T.D.CPMONITOR	3.	T.D.CPMONITOR.MONITORCRITERIA.O	192.465(a) (192.463(a))	Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?
59.	(and 1 other asset)	NA		T.D.CPMONITOR	6.	T.D.CPMONITOR.TEST.R	192.491(c) (192.465(a))	Do records adequately document cathodic protection monitoring tests have occurred as required?
60.	(and 1 other asset)	NA		T.D.CPMONITOR	8.	T.D.CPMONITOR.CURRENTTEST.O	192.465(b)	Are impressed current sources properly maintained and are they functioning properly?
61.	(and 1 other asset)	NA		T.D.CPMONITOR	10.	T.D.CPMONITOR.REVCURRENTTEST.R	192.491(c) (192.465(c))	Do records document details of electrical checks interference bonds, diodes, and reverse current switches?
62.	(and 1 other asset)	NA		T.D.CPMONITOR	13.	T.D.CPMONITOR.DEFICIENCY.R	192.491(c) (192.465(d))	Do records adequately document actions taken to correct any identified deficiencies in corrosion control?
63.	(and 1 other asset)	NA		T.D.CPMONITOR	18.	T.D.CPMONITOR.TESTLEAD.R	192.491(c) (192.471(a), 192.471(b), 192.471(c))	Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?
64.	(and 1 other asset)	NA		T.D.CPMONITOR	21.	T.D.CPMONITOR.INTFRCURRENT.R	192.491(c) (192.473(a))	Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?
65.	(and 1 other asset)	NA	(3)	T.D.CPMONITOR	24.	T.D.CP.RECORDS.R	192.491(a)	Do records indicate the location of all items listed in 192.491(a)?
66.	(and 1 other asset)	NA		T.D.CP	2.	T.D.CP.POST1971.R	192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))	Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?
67.	(and 1 other asset)	NA		T.D.CP	5.	T.D.CP.PRE1971.O	192.457(b)	Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Asset	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
w	s	t		t #			
							cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?
68.	(and 1 other asset)	NA		TD.CP	11. TD.CP.UNPROTECT.R	192.491(c) (192.465(e))	Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?
69.	(and 1 other asset)	NA		TD.CP	13. TD.CP.ELECISOLATE.R	192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))	Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?
70.	(and 1 other asset)	NA	(3)	TD.CP	24. TD.CP.RECORDS.R	192.491(a)	Do records indicate the location of all items listed in 192.491(a)?
71.	(and 1 other asset)	NA		TD.COAT	2. TD.COAT.NEWPIPE.R	192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))	Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?
72.	(and 1 other asset)	NA		TD.CPEXPOSED	2. TD.CPEXPOSED.EXPOSEINSPECT.R	192.491(c) (192.459)	Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?
73.	(and 1 other asset)	NA	(3)	TD.CPEXPOSED	9. TD.CP.RECORDS.R	192.491(a)	Do records indicate the location of all items listed in 192.491(a)?
74.	(and 1 other asset)	NA		TD.ICP	2. TD.ICP.EXAMINE.R	192.491(c) (192.475(a), 192.475(b))	Do records document examination of removed pipe for evidence of internal corrosion?
75.	(and 1 other asset)	NA		TD.ICP	5. TD.ICP.EVALUATE.R	192.491(c) (192.485(c))	Do records document adequate evaluation of internally corroded pipe?
76.	(and 1 other asset)	NA		TD.ICP	7. TD.ICP.REPAIR.R	192.485(a) (192.485(b))	Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?
77.	(and 1 other asset)	NA		TQ.PROT9	1. TQ.PROT9.CORRECTION.O	192.801(a) (192.809(a))	Have potential issues identified by the OQ plan inspection process been corrected at the operational level?
78.	(and 1 other asset)	Sat		TQ.PROT9	2. TQ.PROT9.TASKPERFORMANCE.O	192.801(a) (192.809(a))	Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 86235 (1852)

Row	Asset	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
ws	t)		t #			
							operator approved contractor processes.
79.	(and 1 other asset)	Unsat	TQ.PROT9	3.	TQ.PROT9.QUALIFICATIONSTATUS.O	192.801(a) (192.809(a))	Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.
80.	(and 1 other asset)	Sat	TQ.PROT9	4.	TQ.PROT9.AOCRECOG.O	192.801(a) (192.809(a))	Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.
81.	(and 1 other asset)	Sat	TQ.PROT9	5.	TQ.PROT9.VERIFYQUAL.O	192.801(a) (192.809(a))	Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.
82.	(and 1 other asset)	Sat	TQ.OQ	5.	TQ.OQ.OQCONTRACTOR.R	192.807(a) (192.807(b))	Are adequate records containing the required elements maintained for contractor personnel?
83.	(and 1 other asset)	Sat	TQ.OQ	6.	TQ.OQ.RECORDS.R	192.807	Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?
84.	(and 1 other asset)	NA	TQ.QU	2.	TQ.QU.CORROSION.R	192.453 (192.807(a), 192.807(b))	Do records indicate qualification of personnel implementing pipeline corrosion control methods?
85.	(and 1 other asset)	NA	TQ.QUOMCONST	4.	TQ.QUOMCONST.NDT.R	192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))	Do records indicate the qualification of nondestructive testing personnel?
86.	(and 1 other asset)	NA	TQ.QUOMCONST	5.	TQ.QUOMCONST.WELDER.R	192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))	Do records indicate that welders are adequately qualified?
87.	(and 1 other asset)	Unsat	TQ.TR	2.	TQ.TR.TRAINING.R	192.615(b)(2) (192.807(a), 192.807(b))	Is training for emergency response personnel documented?

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

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.

FORM D: Intrastate GT Standard Records & Field 8288

UTC Standard Comprehensive Inspection Report Intrastate GAS Transmission FORM D: State-Specific Requirements

**** THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS TRANSMISSION OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE RECORDS" and "BASELINE FIELD OBSERVATIONS" MODULES IN THE MOST CURRENT WA-SPECIFIC GT QUESTION SET**

Inspector and Operator Information

Inspection Link 8288	Inspector - Lead Ritter, Dennis	Inspector - Assist
Operator Nouryon Pulp and Performance Chemicals	Unit Nouryon	Records Location - City & State Moses Lake
Inspection Start Date 10-12-2021	Inspection Exit Interview Date 11-02-2021	Engineer Submit Date 11-04-2021

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 is a standard inspection of Nouryon (formerly Akzo Nobel) Pulp and Performance Chemicals LLC's 8-inch polyethylene transmission pipeline located in Grant County WA. Nouryon is located at 2701 Road "N" N.E. Moses Lake Washington. The Company operates 0.45 miles of unodorized, hydrogen transmission line beginning at the Nouryon facility and ending at the JR Simplot potato processing facility located at 14124 Wheeler Road N.E. Moses Lake WA. The line is mostly on private property except where it crosses the public right of way at Wheeler Rd.

The records portion of this inspection was conducted virtually using MS Teams due to Covid-19 protocols currently in place in WA. The inspection was formatted in IA for the WA.GT.2101.01 protocol question set and augmented using WUTC Form D for WA intrastate GT lines. One field day for site inspection was conducted on November 2, 2021 in keeping with Covid-19 requirements. The inspection included a review of onsite documents, OQs, and field inspection of pipeline.

Facilities visited and Total AFOD

10/12/21-Begin records inspection via TEAMS. Records review using IA WA.GT.2101.01 protocol question set and Records review using WUTC Form D for WA intrastate GT 1 AFOD

10/13/21-Complete records review and follow up questions 0.1 AFOD

11/1/21-Nouryon field--travel to Moses Lake WA 0.4 AFOD

11/2/21-Nouryon field-- Moses Lake WA: inspect pipeline valves, right of way conditions, confirm class location, markers, casing vents and OQ. **Exit interview** at Nouryon 14:00 with Jacob St. Mary and Stephen Hernandez 1 AFOD

Summary of Significant Findings (DO NOT Discuss Enforcement options)

The records review revealed the following issues: 1) Nouryon did not have records for conducting emergency response training in 2018 and 2020; 2) Nouryon did not have records showing an annual review of the written procedures or processes in the O&M manual was conducted in 2019. 3) Nouryon does not conduct atmospheric corrosion inspections with qualified individuals on the two isolation valves on each end of the pipeline-V5601 and V5602.

Primary Operator contacts and/or participants

Stephen Hernandez, Director of Operations

FR Compliance Group, Denver CO

(720) 647-3147

Operator executive contact and mailing address for any official correspondence

Jacob St. Mary, HSES Manager

1775 W Oak Commons Ct

Marietta, Georgia 30062

Instructions and Ratings Definitions

INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

N/A - Not Applicable (does not apply to this operator or system)

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

INSPECTION RESULTS

Satisfactory Responses

13

Unsatisfactory Responses

0

Area of Concern Responses

0

Not Applicable Responses

24

Not Checked / Evaluated Responses

0

Satisfactory List

2,3,5,7,8,9,13,21,27,31,32,33,37,38

Unsatisfactory List

Area of Concern List

Not Applicable List

1,4,6,10,11,12,14,15,16,17,18,19,20,22,23,24,25,26,28,29,30,34,35,36,

Not Checked / Evaluated List

Unanswered Questions

0

Unanswered Questions 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 appropriate "RECORDS/FIELD OBSERVATION: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.

INTRASTATE GT RECORDS REVIEW

MAPPING RECORDS

Question 1

THIS QUESTION EXISTS IN IA AS RPT.RR.PIPELINEMAPPING.R Do records indicate that accurate maps (or updates) are provided for 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

Not Applicable

Q1 Notes

Nouryon's line operates below 30 psi with MAOP of 30.

Question 2

THIS QUESTION EXISTS IN IA AS RPT.RR.NPMSANNUAL.R Do records indicate 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

Reviewed NPMS submission email from NPMS showing submission date:

2/12/18 for 2017

3/11/2019 for 2018

3/12/2020 for 2019

2/02/2021 for 2020

Question 3

THIS QUESTION EXISTS IN IA AS DC.MO.RECORDUPDATE.R Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?

Q3 Reference

WAC 480-93-018(5)

Q3 Result

Satisfactory

Q3 Notes

Replaced a valve but in kind so no changes to maps

REPORTING RECORDS

Question 4

THIS QUESTION EXISTS IN IA AS RPT.RR.CONSTRUCTIONDEFECTS.R Do records indicate that the operator has submitted timely and complete (in accordance with WAC 480-93-200(10)) reports of construction defects and material failures that resulted in leaks? (Reports due annually on March 15 for the preceding calendar year).

Q4 Reference

WAC 480-93-200(10)(b)

Q4 Result

Not Applicable

Q4 Notes

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

Question 5

THIS QUESTION EXISTS IN IA AS RPT.NR.CONTACTUPDATE.R Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities? Do the procedures require immediate notification to the commission and municipal authorities if an emergency point of contact changes?

Q5 Reference

WAC 480-93-200(11)

Q5 Result

Satisfactory

Q5 Notes

Reviewed 2018, 2019 and 2020

Question 6

THIS QUESTION EXISTS IN IA AS RPT.RR.FAILUREANALYSIS.R Do records indicate that the operator submits timely and complete written failure analysis reports within 5 days of completion of the failure analysis of any incident or hazardous condition due to construction defects or material failures?

Q6 Reference	Q6 Result	Q6 Notes
WAC 480-93-200(6)	Not Applicable	No such event or activity occurred since the last inspection

Question 7

THIS QUESTION IS COVERED IN IA BY PD.DP.COMMISSIONREPORT.R. AND PD.DP.NOTICETOEXCAVATOR.R Do records indicate that the operator meets damage reporting requirements outlined in RCW 19.122.053(3) and WAC 480-93-200 (7), (8) and (9)?

Q7 Reference	Q7 Reference 2
RCW 19.122.053	WAC 480-93-200(7) (8) and (9)

Q7 Result	Q7 Notes
Satisfactory	Part of one call system WA 811 to notify contractors and others engaged in excavation Send out annual brochures to the following 2021: 282 excavators, 42 government officials, 7 emergency officials, 13 Ag and animal specialty; 67 schools, 111 farmers, 124 residents for a total of 522 mailings. Receive notifications 24-hr phone number Reviewed dig ticket for 8/19/2021 Grant County PUD emergency locate.

Question 8

Do records indicate that the operator filed with the commission, not later than March 15 of each year, applicable to the preceding calendar year: a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.2-1 annual report?

Q8 Reference	Q8 Result	Q8 Notes
WAC 480-93-200(10)	Satisfactory	Reviewed 2018,2019,2020 annual reports. All were submitted prior to March 15--2/26/2021, 3/12/2020, 2/25/2019

DAMAGE PREVENTION RECORDS

Question 9

Do records indicate that the operator's locating and excavation practices are in compliance with all RCW 19.122 requirements for facility operators? Does the records sample indicate that locates are made within two business days?

Q9 Reference	Q9 Result	Q9 Notes
RCW 19.122	Satisfactory	Part of one call system WA 811 to notify contractors and others engaged in excavation Send out annual brochures to the following 2021: 282 excavators, 42 government officials, 7 emergency officials, 13 Ag and animal specialty; 67 schools, 111 farmers, 124 residents for a total of 522 mailings. Receive notifications 24-hr phone number Reviewed dig ticket for 8/19/2021 Grant County PUD emergency locate.

Question 10

THIS QUESTION EXISTS IN IA AS PD.DP.NOTICETOEXCAVATOR.R Do records indicate that the operator provides 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.

Q10 Reference	Q10 Reference 2
RCW 19.122	WAC 480-93-200(8)

Q10 Result	Q10 Notes
Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 11

THIS QUESTION EXISTS IN IA AS (PD.DP.COMMISSIONREPORT.R Do records indicate the operator reports to the commission 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 pipeline facilities.

Q11 Reference	Q11 Result	Q11 Notes
RCW 19.122	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 12

Do records indicate that the operator uses a quality assurance program for monitoring the locating and marking of facilities? Does the operator conduct regular field audits of the performance of locators/contractors and implement appropriate corrective action when necessary?

Q12 Reference	Q12 Result	Q12 Notes
PHMSA State Program Question	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review. Nouryon does not have a QA/QC program as they only have one road crossing in the public ROW. This crossing, Wheeler Rd. is kept continually marked.

Question 13

Do records indicate that the operator's (organic or contracted) locator and excavator personel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

Q13 Reference	Q13 Result	Q13 Notes
WAC 480-93-013	Satisfactory	Jacob St. Mary 7/19/19 for locating No excavation done by Nouryon

Question 14

Do records indicate that the operator is meeting requirements in RCW 19.122.035 with respect to their duties after notice of excavation? Are examinations of uncovered pipe conducted prior to reburial? Does the operator immediately notify local first respondeers and the commission of any blowing gas leak that has ignited or represents a probable hazard to persons or property?

Q14 Reference	Q14 Result	Q14 Notes
RCW 19.122.035	Not Applicable	No excavations since the last inspection within 30' of the pipeline crossing on Wheeler Rd. No incidents since last inspection.

Question 15

Do records indicate that the operator reviews 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	Q15 Result	Q15 Notes
PHMSA State Programs Emphasis - no link	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

DESIGN/CONSTRUCTION RECORDS

Question 16

THIS QUESTION EXISTS IN IA AS RPT.NR.CONSTRUCTIONREPORT.R Do records indicate that the operator is providing notice of proposed new construction or replacement of existing gas transmission lines greater than 100 feet in length is provided in a complete and timely manner in accordance with WAC 480-93-160?

Q16 Reference	Q16 Result	Q16 Notes
WAC 480-93-160	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 17

Do records indicate that the operator ensures each new transmission line and each replacement of line pipe, valve, fitting, or other line component of a transmission line is designed and constructed to accommodate passage of an internal inspection device?

Q17 Reference	Q17 Result	Q17 Notes
WAC 480-93-180	Not Applicable	No such relevant facilities/equipment existed in the scope of inspection review.

Question 18

Do records indicate that plastic pipe joiners are re-qualified within 1 year/NTE 15 months? Do records indicate the operator tracks production joints or re-qualifies joiners within the annual requirement if no joints made within any 12-month period in accordance with WAC 480-94-080(2)?

Q18 Reference	Q18 Result	Q18 Notes
WAC 480-93-160	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review. Nouryon does not employ plastic joiners-contract if necessary.

Question 19

Are the operator's welding qualification and identification records compliant with WAC 480-93-080(1)? Do records indicate that when testing welders or qualifying procedures, the operator is using the necessary testing equipment and recording/documenting all essential variables?

Q19 Reference	Q19 Result	Q19 Notes
WAC 480-93-080(1)	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 20

THIS QUESTION EXISTS IN IA AS DC.DPCOPP.MULTISTAGE.R Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130? Does the operator ensure, when practical, that there is a minimum of fifty feet of separation between regulator stages?

Q20 Reference	Q20 Result	Q20 Notes
WAC 480-93-130	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 21

Do construction/installation records indicate that the operator is complying with WAC 480-93-115 requirements to seal the casing ends of any transmission line installed in a casing or conduit? If casings are installed, is the operator installing only bare steel casings?

Q21 Reference	Q21 Result	Q21 Notes
WAC 480-93-115	Satisfactory	No new casings have been installed since original construction in 1990. Original construction dwgs show casings seals on the drawings.

Question 22

THIS QUESTION EXISTS IN IA AS DC.PT.PRESSTEST.R Do records indicate that the operator performs pressure tests on all new or replacement gas pipeline installations?

Q22 Reference	Q22 Result	Q22 Notes
WAC 480-93-170(2)	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 23

Do records indicate that the operator locates compressor stations consistent with the requirements in WAC 480-93-040?

Q23 Reference	Q23 Result	Q23 Notes
WAC 480-93-040	Not Applicable	No such relevant facilities/equipment existed in the scope of inspection review. Nouryon's compressor operates at under 30 psi.

Question 24

Do records indicate that the operator is reporting, conducting, and documenting pressure testing in accordance with the list of requirements in WAC 480-93-170?

Q24 Reference	Q24 Result	Q24 Notes
WAC 480-93-170	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

CORROSION CONTROL RECORDS

Question 25

Do the operator's cathodic protection records demonstrate that all CP-related surveys, reads, and tests are conducted in accordance with the requirements in WAC 480-93-110? Do records indicate that the operator documents/records the condition of all underground metallic facilities each time the facility is exposed? Does the operator conduct CP test reads on all exposed facilities where the coating has been removed?

Q25 Reference	Q25 Result	Q25 Notes
WAC 480-93-110	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 26

THIS QUESTION EXISTS IN IA AS MO.RW.CASINGLEAKSURVEY.R Do corrosion control records demonstrate that the operator is complying with testing intervals for casings (NTE 15 months), confirmatory follow-up on shorted casings within ninety (90) days of discovery, leak surveys of shorted casings (NTE 7.5 months) and test equipment accuracy checks in accordance with WAC 480-93-110(3) and (5)?

Q26 Reference	Q26 Result	Q26 Notes
WAC 480-93-110(3) and (5)	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review.

Question 27

Do corrosion control records demonstrate that the operator is adhering to its programs for monitoring atmospheric corrosion and taking action within required timeframes for completing remedial action? Do the records demonstrate appropriate monitoring for indications of internal corrosion? Do records demonstrate that the operator has taken appropriate remedial action for areas where internal corrosion is detected?

Q27 Reference	Q27 Result	Q27 Notes
WAC 480-93-110	Satisfactory	The majority of the line is PE and underground. There are two above ground valves at each end of the line--V5601 at Nouryon and V5602 at Simplot. Both valves are class 150 ductile iron body valves and not subject to corrosion like carbon steel valves. Therefore, atmospheric corrosion is not a formal requirement however, Nouryon does check for atmospheric corrosion when they do the annual valve inspection.

Question 28

For casings without test leads installed prior to September 5, 1992, is the operator able to demonstrate that other test/inspection methods are acceptable, and that test leads are not necessary to monitor for electrical isolation and adequate cathodic protection levels?

Q28 Reference	Q28 Result	Q28 Notes
WAC 480-93-110(5)(a)	Not Applicable	No such relevant facilities/equipment existed in the scope of inspection review.

OPERATIONS & MAINTENANCE RECORDS

Question 29

Do leak records demonstrate the operator performs detailed gas leak investigation, evaluation, classification, and remedial action/repair prioritization steps in compliance with WACs 480-93-185, -186, and -18601?

Q29 Reference	Q29 Reference	Q29 Reference 3
WAC 480-93-185	2	WAC 480-93-18601
	WAC 480-93-186	

Q29 Result	Q29 Notes
Not Applicable	No such event occurred, or condition existed, in the scope of inspection review

Question 30

THIS QUESTION EXISTS IN IA AS MO.RW.LEAKRECORDS.R Do leak records meet all content requirements consistent with the criteria in WAC 480-93-187(1-13)?

Q30 Reference	Q30 Result	Q30 Notes
	Not Applicable	No such event occurred, or condition existed, in the scope of inspection review

WAC 480-93-187

Question 31

THIS QUESTION EXISTS IN IA AS MO.RW.SPECIALLEAKSURVEY.R Do leak survey records demonstrate compliance with the instrumentation, accuracy, survey interval, records retention, and self-audit of the leak survey program requirements as specified in WAC 480-93-188?

Q31 Reference	Q31 Result	Q31 Notes
WAC 480-93-188	Satisfactory	Leak detection equipment gas vapor detector QRAE III MO2A016662 self-calibrates every time it is turned on.

Question 32

THIS QUESTION EXISTS IN IA AS MO.RW.SPECIALLEAKSURVEY.R Do leak survey records indicate that the operator is performing special leak surveys under all conditions specified in WAC 480-93-188(4)?

Q32 Reference	Q32 Result	Q32 Notes
WAC 480-93-188(4)	Satisfactory	Because the gas is unodorized they perform a monthly leak survey. Reviewed all months years 2018, 2019, 2020 and 2021 to date. No special leak surveys.

Question 33

Do maintenance records indicate that valve maintenance is performed consistent with the requirements in WAC 480-93-100?

Q33 Reference	Q33 Result	Q33 Notes
WAC 480-93-100	Satisfactory	Reviewed valve inspection records 2018 to 2020--V5601 is inside Nouryon, V5602 is at Simplot. OQ Lind Bingham 3/19/2018 re qualified. Retired end of 2019. Jacob St. Mary 10/23/19

Question 34

THIS QUESTION EXISTS IN IA AS RPT.NR.PROXIMITYREQUEST.R Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?

Q34 Reference	Q34 Result	Q34 Notes
WAC 480-93-020	Not Applicable	No such relevant facilities/equipment existed in the scope of inspection review. No proximity considerations affecting Nouryon are applicable.

Question 35

Do odorization records demonstrate appropriate odorization levels, testing, instrumentation, calibration, and adherence to applicable intervals in accordance with WAC 480-93-015? Does the operator retain records of tests performed and equipment calibration for 5 years? Does the operator take prompt action to investigate and remediate odorant concentrations not meeting the minimum requirements (as applicable)?

Q35 Reference	Q35 Result	Q35 Notes
WAC 480-93-015	Not Applicable	Nouryon does not odorize its hydrogen as the odorant interferes with the boiler system at Simplot and its nearly impossible to odorize hydrogen as molecularly it's too small and the odorant separates.

RECORDS: SUMMARY OF 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

No issues noted from records review. Not applicable questions are as noted above primarily due to the line being PE.

INTRASTATE GT: FIELD OBSERVATIONS

Question 36

Is gas odorized at a concentration in air of at least one-fifth of the lower explosive limit (LEL) so that gas is readily detectable by a person with a normal sense of smell?

Q36 Reference	Q36 Result	Q36 Notes
WAC 480-93-015	Not Applicable	Nouryon transports hydrogen gas which cannot be odorized molecularly and interferes with the gases intended purpose at the Simplot boiler.

Question 37

Are pipeline markers in place and consistent with all requirements in WAC 480-93-124?

Q37 Reference	Q37 Result	Q37 Notes
WAC 480-75-330	Satisfactory	Markers are in place and maintained.

Question 38

Are installed casings consistent with the requirements in WAC 480-93-115? Are all casings bare steel? Are casings sealed? Do unvented casings have separate test leads for casing and pipe to ensure shorted conditions do not exist? Are adequate levels of CP being applied to the operator's pipe?

Q38 Reference	Q38 Result	Q38 Notes
WAC 480-93-115	Satisfactory	The transmission line is PE so corrosion is not an issue inside the casings. Casings are sealed according to original construction records.

FIELD: SUMMARY OF REQUIRED COMMENTS

FIELD OBSERVATIONS 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.

Question 36-Nouryon transports hydrogen gas which cannot be odorized molecularly and interferes with the gases intended purpose at the Simplot boiler.
