

# Inspection Output (IOR)

Generated on 2022.May.26 16:33

## Report Filters

Assets All, and including items not linked to any asset.

Results Unsat,Concern

## Inspection Information

Inspection Name	8435 Lamb Weston PA	Operator(s)	LAMB WESTON/BSW (32560)	Plan Submitted	--
		Lead	Derek Norwood	Plan Approval	--
Status	STARTED	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Scott Anderson, Darren Tinnerstet	All Activity Start	05/18/2022
Start Year	2022			All Activity End	05/18/2022
System Type	GT	Observer(s)	Deborah Becker	Inspection Submitted	--
Protocol Set ID	WA.GT.2022.01	Supervisor	Scott Rukke	Inspection Approval	--
		Director	Sean Mayo		

## Inspection Summary

### Inspection Scope and Summary

This was an inspection of Lamb Weston's Public Awareness Program. Staff reviewed public awareness related records, procedures and inspected right-of-way conditions and pipeline markers. There is one probable violation as a result of this inspection. The details are shown below.

### Facilities visited and Total AFOD

Records and Procedures were reviewed at Lamb Weston Plant in Warden, WA. The pipeline is also in Warden, WA and was inspected for ROW conditions and marker placement.

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

Lamb Weston did not have records showing that they had completed an annual audit or review of their program. This is a requirement under 49 CFR 192.616(c) and API RP 1162 Section 8.3.

### Primary Operator contacts and/or participants

Marvin Price  
Manager Energy & Environment  
509-349-2210

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

Brett Krumwiede  
Plant Manager  
1203 Basin St.  
Warden, WA 98857

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 86294	Lamb Weston	unit	86294	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Plastic Pipe Aluminum/Amphoteric AMAOP CDA Abandoned	45	45	45	45	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.	86294	--	PD	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Public Awareness	--	05/18/2022	--	2	all planned questions	all assets	all types	45	45	45	45	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 - COPY	COMPLETED	05/26/2022	Public Awareness	86294

## Results (Unsat, Concern values, 1 results)

### PD.PA: Public Awareness

1. Question Result, ID, References [Unsat, PD.PA.EVALIMPL.R, 192.616\(c\) \(192.616\(i\), API RP 1162 Section 8.3\)](#)

Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered 86294

Result Issue Summary *Lamb Weston does not have records to show that an audit or review of the program was completed annually. Lamb Weston has a procedure in Section 5.16 of their manual to complete the self-assessment of the program annually but no documentation was available at the time of the inspection. API RP1162 Section 8.3 describes the annual review process, the questions that should be answered and the three*

acceptable methodologies for completing the annual audit. Lamb Weston should refer to this section to develop a process and maintain records that meet this requirement.

**Standard Issues** B2 (Moderate or small impact/limited occurrence) : 192.616(c) : No record/documentation.

**Result Notes** Lamb Weston does not have records to show that an audit or review of the program was completed annually. Lamb Weston has a procedure in Section 5.16 of their manual to complete the self-assessment of the program annually but no documentation was available at the time of the inspection. API RP1162 Section 8.3 describes the annual review process, the questions that should be answered and the three acceptable methodologies for completing the annual audit. Lamb Weston should refer to this section to develop a process and maintain records that meet this requirement.

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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• 86294 (51)

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 86294

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
1.	86294	Sat	2	EP.ERG	24. 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?
2.	86294	Sat	2	MO.RW	1. MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?
3.	86294	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?
4.	86294	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?
5.	86294	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?
6.	86294	Sat	2	MO.RW	5. MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
7.	86294	Sat		PD.DP	1. PD.DP.PDPROGRAM.P	192.614(a)	Is a damage prevention program approved and in place?
8.	86294	Sat		PD.DP	2. PD.DP.ONECALL.P	192.614(b)	Does the process require participation in qualified one-call systems?
9.	86294	Sat		PD.DP	3. PD.DP.EXCAVATEMARK.P	192.614(c)(5)	Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?
10.	86294	Sat		PD.DP	4. PD.DP.TPD.P	192.614(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?
11.	86294	Sat		PD.DP	5. PD.DP.TPDONECALL.P	192.614(c)(3)	Does the process specify how reports of TPD are checked against One-Call tickets?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 86294

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
12.	86294	Sat	PD.DP	6.	PD.DP.ONECALL.O	192.614(c)(3)	Observe operator process a "One Call" ticket.
13.	86294	Sat	PD.DP	7.	PD.DP.PDPROGRAM.R	192.614(c)	Does the damage prevention program meet minimum requirements specified in 192.614(c)?
14.	86294	Sat	PD.DP	8.	PD.DP.DPINFOGATHER.P	192.917(b) (192.935(b)(1)(ii))	Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?
15.	86294	Sat	PD.DP	9.	PD.DP.DPINFOGATHER.R	192.947(b) (192.917(b), 192.935(b)(1)(ii))	Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?
16.	86294	Sat	PD.DP	10.	PD.DP.NOTICETOEXCAVATOR.P		Is there a process to provide the required information to excavators who damage pipeline facilities?
17.	86294	NA	PD.DP	11.	PD.DP.NOTICETOEXCAVATOR.R		Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?
18.	86294	Sat	PD.DP	12.	PD.DP.COMMISSIONREPORT.P		Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?
19.	86294	NA	PD.DP	13.	PD.DP.COMMISSIONREPORT.R		Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?
20.	86294	Sat	PD.PA	1.	PD.PA.ASSETS.P	192.616(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?
21.	86294	Sat	PD.PA	2.	PD.PA.AUDIENCEID.P	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 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 municipalities,

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 86294

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							school districts, businesses, and residents?
22.	86294	Sat	PD.PA	3.	PD.PA.MGMTSUPPORT.P	192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)	Does the operator's program documentation demonstrate management support?
23.	86294	Sat	PD.PA	4.	PD.PA.PROGRAM.P	192.616(a) (192.616(h))	Has the continuing public education (awareness) program been established as required?
24.	86294	Sat	PD.PA	5.	PD.PA.AUDIENCEID.R	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?
25.	86294	Sat	PD.PA	6.	PD.PA.MESSAGES.P	192.616(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 gas is transported?
26.	86294	Sat	PD.PA	7.	PD.PA.SUPPLEMENTAL.P	192.616(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, as described in API RP 1162?
27.	86294	Sat	PD.PA	8.	PD.PA.EDUCATE.R	192.616(d) (192.616(f))	Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?
28.	86294	Sat	PD.PA	9.	PD.PA.LOCATIONMESSAGE.R	192.616(e) (192.616(f))	Were messages developed and delivered to advise

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 86294

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							affected municipalities, school districts, businesses, and residents of pipeline facility locations?
29.	86294	Sat		PD.PA	10. PD.PA.MESSAGEFREQUENCY.R	192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)	Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?
30.	86294	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?
31.	86294	Sat		PD.PA	12. PD.PA.LANGUAGE.P	192.616(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?
32.	86294	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?
33.	86294	Sat		PD.PA	14. PD.PA.EVALPLAN.P	192.616(i) (192.616(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?
34.	86294	Unsat		PD.PA	15. PD.PA.EVALIMPL.R	192.616(c) (192.616(i), API RP 1162 Section 8.3)	Has an audit or review of the operator's program implementation been performed annually since the program was developed?
35.	86294	Sat		PD.PA	16. PD.PA.AUDITMETHODS.R	192.616(c) (192.616(i), API RP 1162 Section 8.3)	Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?
36.	86294	Sat		PD.PA	17. PD.PA.PROGRAMIMPROVE.R	192.616(c) (API RP 1162 Section 8.3)	Were changes made to improve the program and/or the implementation process

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 86294

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							based on the results and findings of the annual audit(s)?
37.	86294	Sat	PD.PA	18.	PD.PA.EVALEFFECTIVENESS.R	192.616(c) (API RP 1162 Section 8.4)	Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?
38.	86294	Sat	PD.PA	19.	PD.PA.MEASUREOUTREACH.R	192.616(c) (API RP 1162 Section 8.4.1)	In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?
39.	86294	Sat	PD.PA	20.	PD.PA.MEASUREUNDERSTANDABILITY.R	192.616(c) (API RP 1162 Section 8.4.2)	In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?
40.	86294	Sat	PD.PA	21.	PD.PA.MEASUREBEHAVIOR.R	192.616(c) (API RP 1162 Section 8.4.3)	In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?
41.	86294	Sat	PD.PA	22.	PD.PA.MEASUREBOTTOM.R	192.616(c) (API RP 1162 Section 8.4.4)	Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?
42.	86294	Sat	PD.PA	23.	PD.PA.CHANGES.R	192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)	Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?
43.	86294	Sat	2	PD.RW	1. MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?
44.	86294	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?
45.	86294	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?



## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 86294

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
46.	86294	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?
47.	86294	Sat	2	PD.RW	5. MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
48.	86294	NA		PD.SP	1. PD.SP.REPAIR.P	190.341(d)(2)	If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?
49.	86294	NA		PD.SP	2. PD.SP.BESTPRACTICE.P	190.341(d)(2)	If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?
50.	86294	NA		PD.SP	3. PD.SP.REPAIR.R	190.341(d)(2)	If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?
51.	86294	NA		PD.SP	4. PD.SP.REQUIREMENT.O	190.341(d)(2)	If the operator operates a pipeline under a special permit verify that the requirements have been implemented.

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*

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