

Inspection Output (IOR)

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Report Filters

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

Results All

Inspection Information

Inspection Name	8613 - Nouryon Operator(s) NOURYON PULP AND PERFORMANCE - Operator CHEMICALS LLC (32358)	Plan Submitted	08/03/2023
Qualification	Lead David Cullom	Plan Approval	08/03/2023 by Dennis Ritter
Program (O)	Supervisor Dennis Ritter	All Activity Start	08/01/2023
Status	PLANNED	Director	Scott Rukke
Start Year	2023	All Activity End	08/01/2023
System Type	GT	Inspection Submitted	--
Protocol Set ID	WA.GT.2022.02	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This was a Operator Qualification (OQ) Program Review covering procedures and records relating to selected procedures.

Facilities visited and Total AFOD

This was an Operator Qualification (OQ) Program review. It did not contain a field inspection component. 1 AFOD

Summary of Significant Findings

There were no probable violations or areas of concern during this inspection.

Primary Operator contacts and/or participants

Esteban (Steve) Martinez - HSES Manager- Nouryon Pulp and Performance Chemicals LLC (509) 765-6400

Taylor Stout - Nouryon Pulp and Performance Chemicals LLC (509) 765-6400

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Operator executive contact and mailing address for any official correspondence

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IA Setup Detail

Operator Qualification Operator Qualification OQ - Operator Qualification 4 Groups: TQ (Select options) All

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	86235 (1852)	NOURYON PULP & PERFORMANCE CHEMICALS LLC	unit	86235	Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Copper Pipe Cast or Ductile Iron Aluminum/Amphoteric	55	55	55	55	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)	--	TQ	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	OQ Program Review	--	08/01/2023	08/01/2023	--	all planned questions	all assets	all types	55	55	55	55	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	OQ Program Review	COMPLETED	08/03/2023	OQ Program Review	86235 (1852)

Results (all values, 55 results)

TQ.PROT9: OQ Protocol 9

1. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**

Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered **86235 (1852)**

Result Notes **No such activity/condition was observed during the inspection.**

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

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*

Assets Covered **86235 (1852)**

Result Notes No such activity/condition was observed during the inspection.

3. Question Result, ID, References NA, 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 Notes No such activity/condition was observed during the inspection.

4. Question Result, ID, References NA, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered 86235 (1852)

Result Notes No such activity/condition was observed during the inspection.

5. Question Result, ID, References NA, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))

Question Text *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.*

Assets Covered 86235 (1852)

Result Notes No such activity/condition was observed during the inspection.

TQ.OQ: Operator Qualification

6. Question Result, ID, References Sat, TQ.OQ.OQPLAN.P, 192.805(a) (192.801(b))

Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*

Assets Covered 86235 (1852)

Result Notes Section 8 has the covered tasks and and identification of a covered task flowchart.

7. Question Result, ID, References Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)

Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*

Assets Covered 86235 (1852)

Result Notes Section 11.1 (Figure 11.1 – OQ Interval Decision Tree)

8. Question Result, ID, References Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)

Question Text *Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?*

Assets Covered 86235 (1852)

Result Notes Section 12.1 Non-Qualified Individuals. The span of control is in Table 11.2

9. Question Result, ID, References Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))

Question Text *Are evaluation methods established and documented appropriate to each covered task?*

Assets Covered 86235 (1852)

Result Notes Section 10.1 Written exams, on the job, evaluations, .etc are used.

10. Question Result, ID, References NA, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 86235 (1852)

Result Notes No such activity/condition was observed during the inspection. Leak surveys and being conducted by Nouryon personeel.

11. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 192.807**
 Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
 Assets Covered **86235 (1852)**
 Result Notes **Records for Nouryons OQ were reviewed for 3 years. OQ records for Taylor were reviewed for 2018 to 2024(exp). 3 year cycle.**
12. Question Result, ID, References **Sat, TQ.OQ.TRAINING.P, 192.805(h)**
 Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*
 Assets Covered **86235 (1852)**
 Result Notes **Section 13 of the OQ manual.**
13. Question Result, ID, References **Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))**
 Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*
 Assets Covered **86235 (1852)**
 Result Notes **Records reviewed for Taylor back to 2018. These were the initial records.**
14. Question Result, ID, References **Sat, TQ.OQ.OQPLANCONTRACTOR.P, 192.805(b) (192.805(f), 192.805(c))**
 Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*
 Assets Covered **86235 (1852)**
 Result Notes **Section 15.1**
15. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.P, 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))**
 Question Text *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*
 Assets Covered **86235 (1852)**
 Result Notes **Section 15.1 for contractors - No Mutual assistance agreements.**
16. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)**
 Question Text *Does the OQ plan document that the operator has assured that the processes on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*
 Assets Covered **86235 (1852)**
 Result Notes **Section 15.1 and Section 5.1**
17. Question Result, ID, References **NA, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)**
 Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*
 Assets Covered **86235 (1852)**
 Result Notes **No such activity/condition was observed during the inspection. Nothing on mutual assistance.**
18. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.P, 192.803**
 Question Text *Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*
 Assets Covered **86235 (1852)**
 Result Notes **Section 8.1 each task has an AOC at the end of each table.**
19. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)**
 Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 86235 (1852)

Result Notes Taylors records were reviewed (2021-24) and there are AOC for each CT, but there is a specific AOC overall task that contains multiple sub AOCs.

20. Question Result, ID, References NA, TQ.OQ.ABNORMAL.O, 192.803

Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*

Assets Covered 86235 (1852)

Result Notes No such activity/condition was observed during the inspection.

21. Question Result, ID, References Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))

Question Text *Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?*

Assets Covered 86235 (1852)

Result Notes Section 14.1 In the middle of the paragraph.

22. Question Result, ID, References NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))

Question Text *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*

Assets Covered 86235 (1852)

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

23. Question Result, ID, References NA, TQ.OQ.OQPLAN.O, 192.805(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability?*

Assets Covered 86235 (1852)

Result Notes No such activity/condition was observed during the inspection.

24. Question Result, ID, References Sat, TQ.OQ.MOC.P, 192.805(f)

Question Text *Does the OQ program identify how changes to processes, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*

Assets Covered 86235 (1852)

Result Notes Section 4.2 Communicating CT revisions. Paragraph 2-4

25. Question Result, ID, References Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i) (192.18)

Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*

Assets Covered 86235 (1852)

Result Notes Section 4.2 paragraph 5. Has not occurred however. Section 2.1 has language as well in the last paragraph.

26. Question Result, ID, References NA, TQ.OQ.CHANGERECORD.R, 192.805(i) (192.805(f), 192.18)

Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*

Assets Covered 86235 (1852)

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

TQ.QU: Qualification of Personnel - Specific Requirements

27. Question Result, ID, References NA, TQ.QU.CORROSION.P, 192.453 (192.805(b))

Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

28. Question Result, ID, References NA, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))
Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*
Assets Covered 86235 (1852)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
29. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))
Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*
Assets Covered 86235 (1852)
Result Notes OQ Manual CT# 36B Section 11 and 8.1 and 15.12 in the O&M.
30. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.R, 192.627 (192.807(a), 192.807(b))
Question Text *Do records indicate the qualification of personnel performing hot taps?*
Assets Covered 86235 (1852)
Result Notes No such event occurred, or condition existed, in the scope of inspection review. No hot tapping.
31. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.O, 192.627 (192.805(h))
Question Text *Do personnel performing hot taps demonstrate adequate skills and knowledge?*
Assets Covered 86235 (1852)
Result Notes No such activity/condition was observed during the inspection.
32. Question Result, ID, References Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-06-01, 192.801, 192.328)
Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*
Assets Covered 86235 (1852)
Result Notes O&M in 18.1 Damage prevention and in the OQ manual Section 8.1 (Marking CT#19) and (and Backfill CT#35)
33. Question Result, ID, References NA, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-06-01, 192.801, 192.328)
Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*
Assets Covered 86235 (1852)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
34. Question Result, ID, References NA, TQ.QU.EXCAVATE.O, 192.805(b) (192.805(h), ADB-06-01, 192.801(a), 192.328(a), 192.328(c))
Question Text *Do individuals who oversee marking, trenching, and backfilling operations demonstrate adequate skills and knowledge?*
Assets Covered 86235 (1852)
Result Notes No such activity/condition was observed during the inspection.

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

35. Question Result, ID, References NA, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b), 192.493)
Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*
Assets Covered 86235 (1852)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
36. Question Result, ID, References NA, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d), 192.493)

Question Text *Do records indicate adequate qualification of integrity management personnel?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

37. Question Result, ID, NA, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i),
References 192.907(b), 192.911(l))

Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

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

38. Question Result, ID, NA, TQ.QUOMCONST.INSPECTOR.P, 192.241(a) (192.241(c), 192.805(b), 192.328(a), 192.328(b))
References

Question Text *Does the process require welding inspection personnel to be adequately trained and qualified?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

39. Question Result, ID, NA, TQ.QUOMCONST.INSPECTOR.R, 192.241(a) (192.241(c), 192.807(a), 192.807(b))
References

Question Text *Do records indicate adequate qualification documentation for personnel who conduct welding inspections?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

40. Question Result, ID, NA, TQ.QUOMCONST.INSPECTOR.O, 192.241(a) (192.241(c))
References

Question Text *Does the welding inspector demonstrate adequate skills and knowledge?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

41. Question Result, ID, NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))
References

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

42. Question Result, ID, NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c),
References 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

43. Question Result, ID, NA, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b),
References 192.805(b))

Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

44. Question Result, ID, NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))
References

Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*

Assets Covered 86235 (1852)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

45. Question Result, ID, **NA**, TQ.QUOMCONST.WELDER.O, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c),
References 192.229(d), 192.803, 192.328(a), 192.328(b))
Question Text *Do welders demonstrate adequate skills and knowledge?*
Assets Covered 86235 (1852)
Result Notes No such activity/condition was observed during the inspection.
46. Question Result, ID, **NA**, TQ.QUOMCONST.NDT.P, 192.243(b)(2) (192.803, 192.805(b), 192.805(h), 192.328(a), 192.328(b))
References
Question Text *Does the process require nondestructive testing of welds to be performed by personnel who are trained and qualified in the established procedures and with the testing equipment employed?*
Assets Covered 86235 (1852)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
47. Question Result, ID, **NA**, TQ.QUOMCONST.NDT.O, 192.243(b)(2) (192.803, 192.328(a), 192.328(b))
References
Question Text *Do nondestructive testing personnel demonstrate adequate skills and knowledge?*
Assets Covered 86235 (1852)
Result Notes No such activity/condition was observed during the inspection.
48. Question Result, ID, **Sat**, TQ.QUOMCONST.PLASTIC.P, 192.285(a) (192.285(d), 192.805(b), 192.285(c))
References
Question Text *Does the process require personnel making joints in plastic pipelines be qualified?*
Assets Covered 86235 (1852)
Result Notes Section O&M 16.16 and OQ Section 8.1 (CT task #36A)
49. Question Result, ID, **Sat**, TQ.QUOMCONST.PLASTICINSPECT.P, 192.287 (192.805(b))
References
Question Text *Does the process require that persons who inspect joints in plastic pipes be qualified?*
Assets Covered 86235 (1852)
Result Notes Section 16.17 (Joint Inspections) in the O&M and it states they must be qualified for inspecting. Section 8.1 CT 36A
50. Question Result, ID, **NA**, TQ.QUOMCONST.PLASTIC.R, 192.285(a) (192.285(d), 192.287, 192.807(a), 192.807(b),
References 192.285(c))
Question Text *Do records indicate adequate qualification of personnel making/inspecting joints in plastic pipelines?*
Assets Covered 86235 (1852)
Result Notes No such event occurred, or condition existed, in the scope of inspection review. No joints made during the inspection time period.
51. Question Result, ID, **NA**, TQ.QUOMCONST.PLASTIC.O, 192.285(a) (192.287, 192.803)
References
Question Text *Do personnel making/inspecting joints in plastic pipelines demonstrate adequate skills and knowledge?*
Assets Covered 86235 (1852)
Result Notes No such activity/condition was observed during the inspection.

TQ.TR: Training of Personnel

52. Question Result, ID, **Sat**, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))
References
Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*
Assets Covered 86235 (1852)
Result Notes Section 19.1 of the O&M (Periodically - at least annually) documented on Form - 1a
53. Question Result, ID, **Sat**, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))
References
Question Text *Is training for emergency response personnel documented?*
Assets Covered 86235 (1852)
Result Notes Last couple years (2-2-2023) 12/12/2022 (sign in sheet requested and then reviewed a few hours later) 8/30/2021 sign in sheet reviewed.10/20/2021 was also performed and 1/10/2021

54. Question Result, ID, References **NA, TQ.TR.TRAINING.O, 192.615(b)(2) (192.805(b))**
Question Text *Do emergency response personnel demonstrate adequate skills and knowledge?*
Assets Covered **86235 (1852)**
Result Notes **No such activity/condition was observed during the inspection.**
55. Question Result, ID, References **Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)**
Question Text *Does the process require review of emergency response personnel performance?*
Assets Covered **86235 (1852)**
Result Notes **Section 19.1 (Last table middle bullet)**

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.