

Inspection Output (IOR)

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Inspection Information

Inspection Name	8458-Solvay Standard	Operator(s)	SOLVAY CHEMICALS, INC. (32399)	Plan Submitted	01/20/2022
Status	PLANNED	Lead	Scott Rukke	Plan Approval	01/21/2022 by Sean Mayo
Start Year	2022	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity Start	02/14/2022
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	03/04/2022
Protocol Set ID	WA.GT.2021.02	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Solvay Chemicals, Inc.

This is an O&M review of Solvays hydrogen pipeline procedures. (transmission).

This inspection will be conducted remotely due to Covid-19 concerns.

All procedures were reviewed electronically.

First day of inspection - 2/14/2022

Exit interview - 3/4/2022

AFOD - Week of 2/14/2022 - 2/18/2022 = 2.5 AFOD days

Week of 2/21/2022 - 2/28/2022 = 3 AFOD days

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SYSTEM DESCRIPTION

Solvay Pipeline Designation: 6" GB-AA11, per Solvay Pipe
 Specification 240.01-700
 Pipe Material: 6" Schedule 40 ASTM A53-B Seamless
 Pipe Length: ~ 500 feet, see attached drawing SK-393 (Attachment F)
 Normal Operating Pressure: 60 psig @ 60°F
 Maximum Allowable Operating Pressure (MAOP): 150 psig
 Hoop Stress: 1775
 % Specified Minimum Yield Strength (SMYS): 5.1%
 Class Location: 1 (per DOT Pipeline Line Safety Regulations, Section 192.5)
 Pipeline Classification: Transmission (per WUTC determination)
 Operator ID: 32399

Scope (Assets)

Short # Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 90612	Solvay Hydrogen System	unit	90612	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned	187	187	187	187	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. 90612	WUTC O&M Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	--	Detail	--
2. 90612	--	GENERIC.GENERIC.GENPROCEDURE.P, GENERIC.GENERIC.GENRECORD.R	P, R	Detail	--

Plan Implementations

# Activity Name	SMAR T Act#	Start Date	Focus Directive	Involved Groups/Subgroups	Qst Asset Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. Office Procedures Review	--	02/14/2022 03/04/2022	--	all planned questions	all assets types	187	187	187	187	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	Office Procedures Review 1	STARTED	--	Office Procedures Review	--
2.	Attendance List	Office Procedures Review	COMPLETED	03/04/2022	Office Procedures Review	90612

Results (all values, 187 results)

199 (instead of 187) results are listed due to re-presentation of questions in more than one sub-group.

AR.PTI: Integrity Assessment Via Pressure Test

- Question Result, ID, References **Sat, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 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), 192.921(a)(2))**
 Question Text *Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?*
 Assets Covered **90612**
 Result Notes **The Solvay pipeline is static and no modifications are made. Solvay has a very basic pressure test statement in Section 7.6 of their O&M manual.**

AR.RMP: Repair Methods and Practices

- Question Result, ID, References **NA, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))**
 Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. The Solvay pipeline operates at approximately 5% of the SMYS. 192.713(b) is for pipelines operating above 40%.**
- Question Result, ID, References **Sat, AR.RMP.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))**
 Question Text *Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?*
 Assets Covered **90612**
 Result Notes **Maintenance Section 7.8.**
- Question Result, ID, References **NA, AR.RMP.HOTTAP.P, 192.605(b)(1) (192.627)**
 Question Text *Is the process adequate for tapping pipelines under pressure?*
 Assets Covered **90612**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The Solvay pipeline is only 541' in length, is static and is not added to. Solvay controls the supply and receipt of the hydrogen gas. No tapping is necessary.**
- Question Result, ID, References **NA, AR.RMP.REPAIRREQT.P, 192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))**
 Question Text *Does the repair process capture the requirements of 192.711 for transmission lines?*
 Assets Covered **90612**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The Solvay pipeline operates at approximately 5% of the SMYS. 192.711 is for pipelines operating above 40%.**
- Question Result, ID, References **NA, AR.RMP.FIELDREPAIRDEFECT.P, 192.605(b)(1) (192.713(a), 192.713(b))**
 Question Text *Is the process adequate for the permanent field repair of defects in transmission lines?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. The Solvay pipeline operates at approximately 5% of the SMYS. This question is for pipelines operating at 40% or higher.**
- Question Result, ID, References **Sat, AR.RMP.FIELDREPAIRWELDS.P, 192.605(b) (192.715(a), 192.715(b), 192.715(c))**

Question Text *Is the process adequate for the permanent field repair of welds?*

Assets Covered 90612

Result Notes Northwest Metal Fab Attachment H has been adopted by Solvay.

8. Question Result, ID, References Sat, AR.RMP.FIELDREPAIRLEAK.P, 192.605(b) (192.717(a), 192.717(b))

Question Text *Is there an adequate process for the permanent field repair of leaks on transmission lines?*

Assets Covered 90612

Result Notes Section 7.8.

9. Question Result, ID, References Sat, AR.RMP.WELDTTEST.P, 192.605(b) (192.719(a), 192.719(b))

Question Text *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 90612

Result Notes Northwest Metal Fab Attachment H as adopted by Solvay.

DC.CO: Construction

10. Question Result, ID, References NA, DC.CO.INSPECTGEN.P, 192.303 (192.305)

Question Text *Does the process require the pipeline to be inspected to ensure that it is constructed in accordance with Part 192?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static and does not have construction activities performed on it.

11. Question Result, ID, References NA, DC.CO.CASING.P, 192.303 (192.323(a), 192.323(b), 192.323(c), 192.323(d), 192.467(a), 192.467(b))

Question Text *Does the process require railroad or highway casings to be in accordance with the requirements of 192.323?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static and does not have construction activities performed on it.

12. Question Result, ID, References NA, DC.CO.NONWELDJOINT.P, 192.303 (192.273(a), 192.273(b), 192.273(c))

Question Text *Does the process require that pipeline joints (to be made other than by welding) be designed and installed in accordance with 192.273?*

Assets Covered 90612

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

13. Question Result, ID, References NA, DC.CO.SPECS.P, 192.303

Question Text *Does the operator have written construction specifications or standards as required of 192.303?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static and no construction activities are performed.

14. Question Result, ID, References NA, DC.CO.INSPECTVISUAL.P, 192.303 (192.307)

Question Text *Does the process require pipe and other components to be visually inspected prior to installation?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static and no construction activities are performed.

15. Question Result, ID, References Sat, DC.CO.REPAIR.P, 192.303 (192.309)

Question Text *Does the process require repairs to steel pipe in accordance with §192.309?*

Assets Covered 90612

Result Notes NWMF attachment H as adopted by Solvay.

16. Question Result, ID, References **NA, DC.CO.FIELD BEND.P, 192.303 (192.313(a), 192.313(b), 192.313(c))**
 Question Text *Does the process require field bends to be made in accordance with 192.313?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. The Solvay pipeline is static and no construction activities are performed.**
17. Question Result, ID, References **NA, DC.CO.WRINKLE BEND.P, 192.303 (192.315(a), 192.315(b))**
 Question Text *Does the process require that wrinkle bends are made in accordance with 192.315?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. The Solvay pipeline is static and no construction activities are performed.**
18. Question Result, ID, References **NA, DC.CO.HAZARD.P, 192.303 (192.317(a), 192.317(b), 192.317(c), 192.103)**
 Question Text *Does the operator have written specifications requiring transmission line or main be protected from hazards in accordance with 192.317?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review.**
19. Question Result, ID, References **NA, DC.DPC.CC PROTECT COAT LOWER.P, 192.143(b) (192.461(c))** (also presented in: DC.DPC)
 Question Text *Do written specifications stipulate that each external protective coating must be inspected just prior to lowering the pipe into the ditch and backfilling, and any damage detrimental to effective corrosion control must be repaired?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. The Solvay pipeline is static.**
20. Question Result, ID, References **NA, DC.CO.INSTALL.P, 192.303 (192.319(a), 192.319(b))**
 Question Text *Does the process require that piping be installed such that stresses are minimized and the coating is protected?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. The Solvay pipeline is static.**
21. Question Result, ID, References **NA, DC.CO.CLEAR.P, 192.303 (192.325(a), 192.325(b), 192.325(c), 192.325(d))**
 Question Text *Does the process require pipe to be installed with clearances specified in 192.325 and (if plastic) installed as to prevent heat damage to the pipe?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. The Solvay pipeline is static.**
22. Question Result, ID, References **NA, DC.CO.COVER ON SHORE.P, 192.303 (192.327(a), 192.327(b), 192.327(c), 192.327(d), 192.327(e))**
 Question Text *Does the process specify that onshore piping is to be installed with a depth of cover as specified in 192.327?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. The Solvay pipeline is static.**

DC.WELDINS P: Construction Weld Inspection

23. Question Result, ID, References **Sat, DC.WELDINS P.WELD VISUAL QUAL.P, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)**
 Question Text *Does the operator have comprehensive written specifications or procedures for the inspection and testing of welds that meet the requirements of 192.241?*
 Assets Covered **90612**
 Result Notes **Attachment H of the Northwest Metal Fab procedures as adopted by Solvay.**
24. Question Result, ID, References **NA, DC.WELDINS P.WELD NDT.P, 192.243**

Question Text *Is there a process for nondestructive testing and interpretation in accordance with 192.243?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static. Solvay does have welding procedures that are part of NWMF procedures.

25. Question Result, ID, References NA, DC.WELDINSP.WELDREPAIR.P, 192.245 (192.303)

Question Text *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

DC.WELDPROCEDURE: Construction Welding Procedures

26. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.P, 192.225

Question Text *Does the operator have written specifications requiring qualified welding procedures in accordance with 192.225?*

Assets Covered 90612

27. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDERQUAL.P, 192.227 (192.225, 192.229)

Question Text *Do the written specifications require welders to be qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX and cover the limitations in 192.229?*

Assets Covered 90612

28. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDWEATHER.P, 192.231 (192.225, 192.227)

Question Text *Does the operator have written specifications that require the welding operation to be protected from weather conditions that would impair the quality of the completed weld?*

Assets Covered 90612

Result Notes Section 7.4

29. Question Result, ID, References Sat, DC.WELDPROCEDURE.MITERJOINT.P, 192.233

Question Text *Does the operator have written specifications or procedures that prohibit the use of certain miter joints as required by 192.233?*

Assets Covered 90612

Result Notes Section 7.4

30. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDPREP.P, 192.235

Question Text *Does the operator have comprehensive written specifications or procedures that require preparations for welding in accordance with 192.235?*

Assets Covered 90612

Result Notes In attachment H from NWMF procedures as adopted by Solvay.

DC.DP: Design of Pipe

31. Question Result, ID, References NA, DC.DP.PIPEDESGEN.P, 192.103 (192.105, 192.107, 192.109, 192.111, 192.112, 192.115, 192.121, 192.123, 192.125, 192.303, 192.305, 192.307)

Question Text *Does the operator have specifications in place for pipe design so that the wall thickness is sufficient or installed with adequate protection to withstand external pressures and loads that will be imposed on the pipe after installation?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. Solvay's pipeline is static.

32. Question Result, ID, References Sat, DC.DP.PIPEDESMAOP.P, 192.105 (192.103, 192.107, 192.109, 192.111, 192.113, 192.115, 192.121, 192.123, 192.125, 192.303, 192.305, 192.307)

Question Text *Does the operator have written procedures in place for steel pipe design so that the wall thickness is sufficient for the intended maximum operating pressure as required by 192.105?*

Assets Covered 90612

33. Question Result, ID, Sat, DC.DP.PIPEDESFACTOR.P, 192.111 (192.103, 192.105, 192.107, 192.109, 192.112, 192.115, References 192.121, 192.123, 192.125, 192.303, 192.305, 192.307)
Question Text *Does the operator have written procedures for determining the Design Factor to be used for steel pipe as required by 192.111?*
Assets Covered 90612

DC.DPCOPP: Design of Pipe - Overpressure Protection

34. Question Result, ID, NA, DC.DPCOPP.OVERPRESSURE.P, 192.303 (192.143(b), 192.195(a), 192.199(a), 192.199(b), References 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c), 192.143(a))
Question Text *Does the process require the pipeline have pressure relieving or pressure limiting devices that are required of 192.195(a), and that they meet the requirements of 192.199 and 192.201?*
Assets Covered 90612
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Solvay's pipeline has no jurisdictional regulation or over-pressure protection devices.
35. Question Result, ID, NA, DC.DPCOPP.PRESSLIMIT.P, 192.303 (192.143(b), 192.199(a), 192.199(b), 192.199(c), 192.199(d), References 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.143(a))
Question Text *Does the process require that pressure relieving or pressure limiting devices meet the requirements of 192.199?*
Assets Covered 90612
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Solvay's pipeline has no jurisdictional regulation or over-pressure protection devices.
36. Question Result, ID, NA, DC.DPCOPP.PRESSLIMITCAP.P, 192.201(a) (192.143(a), 192.143(b), 192.201(b), 192.201(c))
References
Question Text *Does the process require that pressure relief or pressure limiting stations being installed comply with 192.201?*
Assets Covered 90612
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Solvay's pipeline has no jurisdictional regulation or over-pressure protection devices.
37. Question Result, ID, NA, DC.DPCOPP.MULTISTAGE.P,
References
Question Text *Does the process require that the operator install multistage regulator equipment consistent with the requirements in WAC 480-93-130?*
Assets Covered 90612
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Solvay's pipeline has no jurisdictional regulation or over-pressure protection devices.

DC.DPC: Design of Pipe Components

38. Question Result, ID, NA, DC.DPC.METALCOMPONENT.P, 192.144 (192.607)
References
Question Text *Do the procedures require certain metallic components to be qualified for use in accordance with 192.144?*
Assets Covered 90612
Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
39. Question Result, ID, NA, DC.DPC.VALVE.P, 192.145 (192.145(a), 192.145(b), 192.145(c), 192.145(d), 192.145(e), References 192.145(f), 192.607)
Question Text *Do the procedures require that valves comply with the requirements of §192.145?*
Assets Covered 90612
Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
40. Question Result, ID, NA, DC.DPC.FLANGE.P, 192.147 (192.147(a), 192.147(b), 192.147(c), 192.607)
References
Question Text *Do the procedures require that flanges and flange accessories meet the requirements of §192.147?*
Assets Covered 90612

- Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
41. Question Result, ID, References NA, DC.DPC.STANDARDFITTING.P, 192.149 (192.149(a), 192.149(b), 192.149(c), 192.607)
 Question Text *Do procedures require that standard fittings are in compliance with §192.149?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
42. Question Result, ID, References NA, DC.DPC.ILIPASS.P, 192.103 (192.150(a), 192.150(c))
 Question Text *Does the process require that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static and only 500' in length.
43. Question Result, ID, References NA, DC.DPC.TAP.P, 192.143 (192.151(a), 192.151(b), 192.151(c).)
 Question Text *Does the process require pipeline hot taps (or taps) and tapping fittings to comply with the requirements of 192.151?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
44. Question Result, ID, References NA, DC.DPC.WELDFABRICATE.P, 192.143(a) (192.153(a), 192.153(b), 192.153(c), 192.153(d))
 Question Text *Does the process require components fabricated by welding, such as branch connections, assemblies of standard pipe, or prefabricated units utilized in the construction of a pipeline, are to be in accordance with 192.153?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
45. Question Result, ID, References NA, DC.DPC.EXTRUDEOUTLET.P, 192.149(b) (192.157)
 Question Text *Does the process require each extruded outlet to be suitable for anticipated service conditions and designed in accordance to §192.157?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
46. Question Result, ID, References NA, DC.DPC.FLEXIBLE.P, 192.143(a) (192.159)
 Question Text *Does the process require pipeline and pipe components to be designed for flexibility in accordance with §192.159?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
47. Question Result, ID, References NA, DC.DPC.SUPPORT.P, 192.161
 Question Text *Does the process require piping and associated equipment to have sufficient anchors or supports to prevent undue strain on connected equipment, resist longitudinal forces, and prevent or dampen excessive vibration in accordance with §192.161?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.
48. Question Result, ID, References NA, DC.DPC.VALVESPACE.P, 192.143 (192.179(a), 192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d))
 Question Text *Does the process require transmission line valve spacing to be accordance with 192.179(a)?*
 Assets Covered 90612
 Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static and is only 500' in length.
49. Question Result, ID, References NA, DC.DPC.INSTRUMENTPIPE.P, 192.143(a) (192.143(b), 192.203(a), 192.203(b))

Question Text *As applicable to the project, does the process require that instrument, control, and sampling pipe and components are to be designed in accordance with 192.203?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

50. Question Result, ID, References NA, DC.DPC.INTCORRODE.P, 192.453 (192.476(a), 192.476(b), 192.476(c))

Question Text *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

51. Question Result, ID, References Sat, DC.DPC.CCPROTCOATSURFPREP.P, 192.143(b) (192.461(a), 192.303, 192.309(a))

Question Text *Do the procedures and/or written specifications stipulate that each protective coating applied for the purpose of external corrosion control must be applied on a properly prepared surface?*

Assets Covered 90612

Result Notes Added to 7.5 during this inspection.

52. Question Result, ID, References Sat, DC.DPC.CCPROTCOATPROP.P, 192.143(b) (192.461(a)(2), 192.461(a)(3), 192.461(a)(4), 192.461(a)(5), 192.461(b))

Question Text *Do the operator's written specifications stipulate that each protective coating applied for the purpose of external corrosion control will have sufficient adhesion to the metal surface to effectively resist underfilm migration of moisture; sufficient ductility to resist cracking; sufficient strength to resist damage due to handling and soil stress; properties compatible with any supplemental cathodic protection; and, electrically insulating type with low moisture absorption and high electrical resistance?*

Assets Covered 90612

Result Notes Added to 7.5 during this inspection.

53. Question Result, ID, References NA, DC.DPC.CCPROTCOATLOWER.P, 192.143(b) (192.461(c)) (also presented in: DC.CO)

Question Text *Do written specifications stipulate that each external protective coating must be inspected just prior to lowering the pipe into the ditch and backfilling, and any damage detrimental to effective corrosion control must be repaired?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

54. Question Result, ID, References Sat, DC.DPC.CCPROTCOATINGINDITCH.P, 192.143(b) (192.461(d))

Question Text *Do operator's written specifications stipulate that each external protective coating must be protected from damage resulting from adverse ditch conditions or damage from supporting blocks?*

Assets Covered 90612

Result Notes Added to 7.5 during this inspection.

55. Question Result, ID, References NA, DC.DPC.CCPROTCOATBORING.P, 192.143(b) (192.461(e))

Question Text *Do operator's written specifications stipulate that precautions must be taken to minimize damage to the coating during installation, if coated pipe is installed by boring, driving, or other similar method?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

56. Question Result, ID, References NA, DC.DPC.CORROSIONQUAL.P, 192.303 (192.143(b), 192.453)

Question Text *Do the operator's written specifications stipulate that the design and installation of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

57. Question Result, ID, References NA, DC.DPC.CCCATHPROTDES.P, 192.463(a) (192.143(b))

Question Text *Do operator's written specifications stipulate that the cathodic protection system must be designed and installed to comply with one or more of the applicable criteria contained in Appendix D of Part 192?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

58. Question Result, ID, References NA, DC.DPC.CCCATHPROTLEVEL.P, 192.303 (192.143, 192.463(c))

Question Text *Do the operator's written specifications stipulate that amount of cathodic protection must be designed so as not to damage the protective coating or the pipe?*

Assets Covered 90612

Result Notes

No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

59. Question Result, ID, References Sat, DC.DPC.CCELECTRICALISOL.P, 192.467(c) (192.143(b))

Question Text *Do operator's written specifications stipulate that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?*

Assets Covered 90612

60. Question Result, ID, References NA, DC.DPC.CCELECTRISOLSTRUCT.P, 192.143(b) (192.467(a), 192.467(b), 192.467(d), 192.467(e), 192.467(f), NACE RP0169, NACE SP0200-2008)

Question Text *Do written specifications stipulate that each buried or submerged pipeline must be electrically isolated from other underground metallic structures?*

Assets Covered 90612

Result Notes No such activity/condition was observed during the inspection. Solvay's pipeline is static and no new construction is conducted. The pipeline is insulated from other structures and is only 481' in length.

61. Question Result, ID, References NA, DC.DPC.CCEXTRNLPROT.P, 192.303 (192.143(b), 192.455(a))

Question Text *Do the written specifications stipulate that each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

DC.MO: Maintenance and Operations

62. Question Result, ID, References Sat, DC.MO.ICEXAMINE.P, 192.605(b) (192.475(a), 192.475(b), 192.475(c))

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered 90612

63. Question Result, ID, References Sat, DC.MO.MAOPLIMIT.P, 192.605(b)(5)

Question Text *Does the process include procedures for starting up and shutting down any part of the pipeline system in a manner designed to assure operation within the MAOP limits prescribed by Part 192, plus the build-up allowed for operation of pressure-limiting and control devices?*

Assets Covered 90612

Result Notes Solvay's pipeline is designed to where it is not possible to exceed the MAOP during startup or shutdown.

64. Question Result, ID, References NA, DC.MO.HOTTAP.P, 192.605(b) (192.627)

Question Text *Are there processes for tapping pipelines under pressure?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static. No tapping is done on the Solvay pipeline.

DC.MA: Materials

65. Question Result, ID, References NA, DC.MA.GEN.P, 192.53 (192.55, 192.59, 192.63)

Question Text *Does the operator have written specifications or procedures that require that materials for pipe and components meet the requirements of 192.53?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

66. Question Result, ID, NA, DC.MA.STEELPIPE.P, 192.55 (192.53)
References

Question Text *Does the operator have written procedures or specifications that require steel pipe be qualified for use under Part 192 according to 192.55? (see considerations for requirements of 192.55)*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

67. Question Result, ID, NA, DC.MA.MARKING.P, 192.63
References

Question Text *Does the operator have specifications requiring pipe, valves, and fittings to be marked according to the requirements of 192.63?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

DC.PT: Pressure Testing

68. Question Result, ID, NA, DC.PT.PRESSTEST.P, 192.605(b) (192.303, 192.503(a), 192.503(b), 192.503(c), 192.503(d),
References 192.503(e)) (also presented in: DC.PTLOWPRESS)

Question Text *Does the process require pressure testing to be conducted for new segments of pipeline, or return to service segments of pipeline that are being relocated or replaced?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

69. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.P, 192.505(a) (192.143(a), 192.505(b), 192.505(c), 192.505(d),
References 192.143(b), 192.143(c))

Question Text *Does the process require that, as applicable to the project, sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS be strength tested in accordance with the requirements of 192.505?*

Assets Covered 90612

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Solvay operates their pipeline at approximately 5% of the SMYS.

70. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in:
References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

71. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in:
References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

72. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PTLOWPRESS)
References

Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*

Assets Covered 90612

Result Notes Section 7.6

73. Question Result, ID, Sat, DC.PT.EQUIPMENTCALIBRATION.P,
References

Question Text *Does the process ensure that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer's recommendations?*

Assets Covered 90612

Result Notes Section 7.6

DC.PTLOWPRESS: Pressure Testing - Low Pressure

74. Question Result, ID, NA, DC.PT.PRESSTEST.P, 192.605(b) (192.303, 192.503(a), 192.503(b), 192.503(c), 192.503(d),
References 192.503(e)) (also presented in: DC.PT)

Question Text *Does the process require pressure testing to be conducted for new segments of pipeline, or return to service segments of pipeline that are being relocated or replaced?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

75. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.P, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018
References Appendix G-192-9)

Question Text *Does the process require that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig be tested in accordance with the requirements of 192.507?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review.

76. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT)
References

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

77. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT)
References

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. The Solvay pipeline is static.

78. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT)
References

Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*

Assets Covered 90612

Result Notes Section 7.6

DC.TQ: Training and Qualification

79. Question Result, ID, NA, DC.TQ.OQCONSTMAINT.P, 192.805(a) (Operators OQ program manual)
References

Question Text *Does the process include covered tasks relating to "construction-type" maintenance?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. Solvay's pipeline is static.

EP.ERG: Emergency Response

80. Question Result, ID, Sat, EP.ERG.REVIEW.P, 192.605(a)
References

Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered 90612

Result Notes [Section 4, Page 6 of the emergency plan.](#)

81. Question Result, ID, References [Sat, EP.ERG.INCIDENTDATA.P, 192.605\(b\)\(4\) \(191.5\(a\)\)](#)
Question Text *Does the process include the steps necessary for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner?*
Assets Covered [90612](#)
Result Notes [Section 4 page 9.](#)
82. Question Result, ID, References [Sat, EP.ERG.NOTICES.P, 192.615\(a\)\(1\)](#)
Question Text *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?*
Assets Covered [90612](#)
Result Notes [HSE 3003 thru 3015](#)

[Section 18 page 37.](#)
83. Question Result, ID, References [Sat, EP.ERG.COMMSYS.P, 192.615\(a\) \(192.615\(a\)\(2\)\)](#)
Question Text *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?*
Assets Covered [90612](#)
Result Notes [Paragraph 7.10.7 O&M manual. The PA letter is sent to the emergency officials annually. Additionally, the O&M is reviewed annually, which includes reviewing the list of stakeholders included in the manual](#)
84. Question Result, ID, References [Sat, EP.ERG.RESPONSE.P, 192.615\(a\) \(192.615\(a\)\(3\), 192.615\(a\)\(11\), 192.615\(b\)\(1\)\)](#)
Question Text *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?*
Assets Covered [90612](#)
Result Notes [Site procedures HSE-3004-I, HSE-3006-I, HSE-3007-I, HSE-3008-I. Solvay's pipeline is under 500' in length and there are no buildings in the vicinity of the pipeline.](#)
85. Question Result, ID, References [Sat, EP.ERG.READINESS.P, 192.615\(a\) \(192.615\(a\)\(4\)\)](#)
Question Text *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?*
Assets Covered [90612](#)
Result Notes [Solvay is manned 24/7. The pipeline can easily be shut down in an emergency.](#)
86. Question Result, ID, References [Sat, EP.ERG.PUBLICPRIORITY.P, 192.615\(a\) \(192.615\(a\)\(5\)\)](#)
Question Text *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?*
Assets Covered [90612](#)
Result Notes [Procedure HSE-3006-I](#)
87. Question Result, ID, References [Sat, EP.ERG.PRESSREDUCESD.P, 192.615\(a\) \(192.615\(a\)\(6\)\)](#)
Question Text *Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?*
Assets Covered [90612](#)
88. Question Result, ID, References [Sat, EP.ERG.PUBLICHAZ.P, 192.605\(a\) \(192.615\(a\)\(7\)\)](#)
Question Text *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?*
Assets Covered [90612](#)
Result Notes [Procedure HSE-3006-I](#)

89. Question Result, ID, References **Sat, EP.ERG.AUTHORITIES.P, 192.615(a) (192.615(a)(8))**
 Question Text *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?*
 Assets Covered **90612**
90. Question Result, ID, References **NA, EP.ERG.OUTAGERESTORE.P, 192.615(a) (192.615(a)(9))**
 Question Text *Does the emergency plan include procedures for safely restoring any service outage?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. The Solvay pipeline is static. There are no customers.**
91. Question Result, ID, References **Sat, EP.ERG.INCIDENTACTIONS.P, 192.615(a) (192.615(a)(10))**
 Question Text *Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?*
 Assets Covered **90612**
 Result Notes **Procedure added during this inspection. Page 25 of their O&M.**
92. Question Result, ID, References **Sat, EP.ERG.INCIDENTANALYSIS.P, 192.617**
 Question Text *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?*
 Assets Covered **90612**
 Result Notes **Procedure added during this inspection. Page 25 of their O&M.**
93. Question Result, ID, References **Sat, EP.ERG.POSTEVTREVIEW.P, 192.615(b)(3)**
 Question Text *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?*
 Assets Covered **90612**
 Result Notes **Procedure HSE 3005 5.11**
94. Question Result, ID, References **Sat, EP.ERG.LIAISON.P, 192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)**
 Question Text *Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?*
 Assets Covered **90612**
 Result Notes **O&M Section 7.10.**

MO.GC: Conversion to Service

95. Question Result, ID, References **NA, MO.GC.CONVERSION.P, 192.14(a) (192.14(b), 192.14(c))**
 Question Text *If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?*
 Assets Covered **90612**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

96. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMAL.P, 192.605(a) (192.605(c)(1))**
 Question Text *Does the process fully address the responsibilities during and after an abnormal operation?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

97. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMALCHECK.P, 192.605(a) (192.605(c)(2))**
 Question Text *Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review.**
98. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMALNOTIFY.P, 192.605(a) (192.605(c)(3))**
 Question Text *Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review.**
99. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMALREVIEW.P, 192.605(a) (192.605(c)(4))**
 Question Text *Does the process include requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review.**

MO.GOCLASS: Gas Pipeline Class Location

100. Question Result, ID, References **NA, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), 192.611(d))**
 Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Solvay operates at approximately 5% of the SMYS**
101. Question Result, ID, References **NA, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also presented in: MO.GO)
 Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

This may be applicable.
102. Question Result, ID, References **NA, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))**
 Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS, or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Solvay operates their pipeline at approximately 5%.**

MO.GOMAOP: Gas Pipeline MAOP

103. Question Result, ID, References **Sat, MO.GOMAOP.MAOPDETERMINE.P, 192.605(b)(1) (192.619(a), 192.619(b), 192.619(f))**
 Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?*

Assets Covered 90612

104. Question Result, ID, References Sat, MO.GOMAOP.MAOPLIMIT.P, 192.605(a) (192.605(b)(5))

Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*

Assets Covered 90612

Result Notes The Solvay pipeline is only 500' in length and it has no jurisdictional regulators or over pressure protection devices. It is designed so that it can not exceed it's MAOP.

MO.GM: Gas Pipeline Maintenance

105. Question Result, ID, References Sat, MO.GM.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))

Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*

Assets Covered 90612

Result Notes Section 7.8 pg 29.

106. Question Result, ID, References Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GMOPP)

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 90612

107. Question Result, ID, References NA, MO.GM.VALVEINSPECT.P, 192.605(b)(1) (192.745(a), 192.745(b))

Question Text *Are their processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*

Assets Covered 90612

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. There are no jurisdictional valves on the Solvay pipeline.

MO.GOODOR: Gas Pipeline Odorization

108. Question Result, ID, References NA, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*

Assets Covered 90612

Result Notes Solvay's pipeline is non-odorized because the odorant would make the gas unfit for use in their manufacturing process.

MO.GO: Gas Pipeline Operations

109. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 90612

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

This may be applicable.

110. Question Result, ID, References Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))

Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*

Assets Covered 90612

Result Notes Section 7.7 page 25.

111. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)
Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*
Assets Covered 90612
Result Notes Section 4 page 6.
112. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))
Question Text *Does the process include requirements for periodically reviewing 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?*
Assets Covered 90612
Result Notes Annual Field Audit - Page 23.

(b)(8) The Engineering & Maintenance Manager shall complete the Hydrogen Pipeline Field Audit Form EM3302-F2 (see example in attachment K) within each calendar year. Upon completion, the form will be maintained electronically on the company intranet.
113. Question Result, ID, References Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))
Question Text *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*
Assets Covered 90612
Result Notes Section 7.7. (b)(3) – Records on system operating history including operating pressure, leak history, repairs, and construction records will be accessible for operating personnel. Such information is available to site personnel via Aspen or SAP. Construction records are maintained in the Solvay ESR files located in the E/M
114. Question Result, ID, References Sat, MO.GO.SRC.P, 192.605(a) (192.605(d), 191.23(a)) (also presented in: RPT.RR)
Question Text *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions, including MAOP Exceedances?*
Assets Covered 90612
Result Notes Solvay's pipeline is designed to not be able to exceed their MAOP.
115. Question Result, ID, References Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))
Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*
Assets Covered 90612
Result Notes Solvays pipeline is unique. It is less than 500' in length and Solvay is the only entity in close proximity to the pipeline. In addition the pipeline is unodorized so there would be no response to odor calls. Leak responses are outlined in Attachment B.
116. Question Result, ID, References NA, MO.GO.UPRATE.P, 192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))
Question Text *Is the pressure uprating process consistent with the requirements of 192.553?*
Assets Covered 90612
Result Notes No such requirement existed in the scope of inspection review.

MO.GMOPP: Gas Pipeline Overpressure Protection

117. Question Result, ID, References NA, MO.GMOPP.PRESSREGCAP.P, 192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))
Question Text *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*
Assets Covered 90612
Result Notes No such requirement existed in the scope of inspection review. The pipeline is incapable of exceeding its MAOP due to the compressor not being able to reach the pressure established by pressure test.

118. Question Result, ID, References **NA, MO.GMOPP.PRESSREGTEST.P, 192.605(b)(1) (192.739(a), 192.739(b))**
 Question Text *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. There is no jurisdictional regulation or OPP. No such requirement existed in the scope of inspection review. The pipeline is incapable of exceeding it's MAOP due to the compressor not being able to reach the pressure established by pressure test.**
119. Question Result, ID, References **Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c))** (also presented in: **MO.GM**)
 Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*
 Assets Covered **90612**

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

120. Question Result, ID, References **NA, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c))** (also presented in: **PD.RW**)
 Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
121. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: **PD.RW**)
 Question Text *Does the process adequately cover the requirements for placement of ROW markers?*
 Assets Covered **90612**
 Result Notes **Procedure P9**
122. Question Result, ID, References **Sat, MO.RW.MARKERSURVEY.P,**
 Question Text *Are procedures in place to survey pipeline markers at specified intervals?*
 Assets Covered **90612**
123. Question Result, ID, References **Sat, MO.RW.LEAKAGE.P, 192.706 (192.706(a), 192.706(b), 192.935(d))**
 Question Text *Does the process require leakage surveys to be conducted?*
 Assets Covered **90612**
 Result Notes **Leak surveys are conducted monthly because the hydrogen is unodorized.**
124. Question Result, ID, References **Sat, MO.RW.CASINGLEAKSURVEY.P,**
 Question Text *Does the process require shorted casings be leak surveyed as required?*
 Assets Covered **90612**
 Result Notes **This procedure was added during this inspection. Since Solvay does not have any shorted casings this was acceptable.**
125. Question Result, ID, References **Sat, MO.RW.SPECIALLEAKSURVEY.P,**
 Question Text *Is there a process to conduct special leak surveys as required by WAC 480-93-188?*
 Assets Covered **90612**
 Result Notes **Added to page 30 of their O&M during this inspection. WAC 480-93-188 (4)(a)(b)(c)(d).**
126. Question Result, ID, References **Sat, MO.RW.LEAKGRADE.P,**
 Question Text *Do procedures require grading/re-grading leaks and evaluating the concentration and extent of leakage?*
 Assets Covered **90612**
 Result Notes **WAC leak grading requirements added to O&M page 26 during this inspection.**

127. Question Result, ID, References **Sat, MO.RW.LEAKPERIMETER.P,**
 Question Text *Do procedures require checking the perimeter of a gas leak with a combustible gas indicator?*
 Assets Covered **90612**
 Result Notes **Added to O&M page 26 during this inspection.**
128. Question Result, ID, References **Sat, MO.RW.LEAKFOLLOWUP.P,**
 Question Text *Do procedures require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground not later than thirty days after the repair?*
 Assets Covered **90612**
 Result Notes **Procedure added to O&M page 26 during this inspection.**
129. Question Result, ID, References **Sat, MO.RW.LEAKCALIBRATE.P,**
 Question Text *Is there a process to maintain and calibrate gas detection instruments in accordance with the manufacturer's recommendations?*
 Assets Covered **90612**
 Result Notes **Solvay's leak survey contractor (Northwest metal fab) is in the process of switching leak detection instruments and they will add the new calibration requirements to their procedures.**

PD.DP: Damage Prevention

130. Question Result, ID, References **NA, PD.DP.PDPROGRAM.P, 192.614(a)**
 Question Text *Is a damage prevention program approved and in place?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
131. Question Result, ID, References **NA, PD.DP.ONECALL.P, 192.614(b)**
 Question Text *Does the process require participation in qualified one-call systems?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
132. Question Result, ID, References **NA, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)**
 Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
133. Question Result, ID, References **NA, PD.DP.TPD.P, 192.614(c)(1)**
 Question Text *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?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
134. Question Result, ID, References **NA, PD.DP.TPDONECALL.P, 192.614(c)(3)**
 Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
135. Question Result, ID, References **NA, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))**
 Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**

136. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.P,**
 Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*
 Assets Covered **90612**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Inspected under 8459**
137. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.P,**
 Question Text *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)?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**

PD.PA: Public Awareness

138. Question Result, ID, References **NA, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)**
 Question Text *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?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
139. Question Result, ID, References **NA, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**
 Question Text *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, school districts, businesses, and residents?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
140. Question Result, ID, References **NA, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)**
 Question Text *Does the operator's program documentation demonstrate management support?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
141. Question Result, ID, References **NA, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))**
 Question Text *Has the continuing public education (awareness) program been established as required?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
142. Question Result, ID, References **NA, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)**
 Question Text *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?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
143. Question Result, ID, References **NA, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)**
 Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review. Inspected under 8459**
144. Question Result, ID, References **NA, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)**
 Question Text *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?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. Inspected under 8459

145. Question Result, ID, NA, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)
References

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. Inspected under 8459

PD.RW: ROW Markers, Patrols, Monitoring

146. Question Result, ID, NA, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)
References

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 90612

Result Notes No such requirement existed in the scope of inspection review. Inspected under 8459

147. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in:
References MO.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 90612

Result Notes Procedure P9

RPT.NR: Notices and Reporting

148. Question Result, ID, Sat, RPT.NR.CONTACTUPDATE.P,
References

Question Text *Is there a process to submit 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?*

Assets Covered 90612

149. Question Result, ID, NA, RPT.NR.CONSTRUCTIONREPORT.P,
References

Question Text *Is there a process to file a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*

Assets Covered 90612

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

150. Question Result, ID, NA, RPT.NR.PRESSURETESTNOTIFY.P,
References

Question Text *Is there a process to notify the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*

Assets Covered 90612

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Nothing will be tested over 20%.

151. Question Result, ID, NA, RPT.NR.PROXIMITYREQUEST.P,
References

Question Text *Do the procedures specify detailed steps to comply with the proximity consideration requirement in WAC 480-93-020?*

Assets Covered 90612

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Maximum MAOP is 150 psig.

RPT.RR: Regulatory Reporting (Traditional)

152. Question Result, ID, Sat, RPT.RR.CONSTRUCTIONDEFECTS.P,
References

Question Text *Is there a process to submit timely and complete reports of construction defects and material failures that resulted in leaks?*

Assets Covered 90612

Result Notes Page 11 of their O&M.

153. Question Result, ID, References Sat, RPT.RR.IMMEDREPORT.P, 191.5(b) (191.7)

Question Text *Is there a process to immediately report incidents to the National Response Center?*

Assets Covered 90612

Result Notes Section 4. This procedure was revised at the time of this inspection to meet the requirements of 191.23.

154. Question Result, ID, References Sat, RPT.RR.INCIDENTREPORT.P, 191.15(a) (192.624(a)(1), 192.624(a)(2))

Question Text *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?*

Assets Covered 90612

155. Question Result, ID, References Sat, RPT.RR.INCIDENTREPORTSUPP.P, 191.15(d) (192.624(a))

Question Text *Does the process require preparation and filing of supplemental incident reports?*

Assets Covered 90612

156. Question Result, ID, References Sat, RPT.RR.FAILUREANALYSIS.P,

Question Text *Is there a process to submit failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*

Assets Covered 90612

157. Question Result, ID, References Sat, RPT.RR.SRCR.P, 192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(b), 191.25(c))

Question Text *Do processes require reporting of safety-related conditions?*

Assets Covered 90612

Result Notes Their current definition of an SRC was incorrect as it did not match CFR Part 191.23.

Section 7.0 pages 12 and 13. This procedure was modified at the time of this inspection.

158. Question Result, ID, References Sat, MO.GO.SRC.P, 192.605(a) (192.605(d), 191.23(a)) (also presented in: MO.GO)

Question Text *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions, including MAOP Exceedances?*

Assets Covered 90612

Result Notes Solvay's pipeline is designed to not be able to exceed their MAOP.

159. Question Result, ID, References Sat, RPT.RR.OPID.P, 191.22(a) (191.22(c), 191.22(d))

Question Text *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered 90612

160. Question Result, ID, References Sat, RPT.RR.DIRTREPORTS.P,

Question Text *Is there a process to submit reports of damage to the commission using the Damage Information Reporting Tool (DIRT) within 45 days?*

Assets Covered 90612

TD.ATM: Atmospheric Corrosion

161. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.P, 192.605(b)(2) (192.479(a), 192.479(b), 192.479(c))

Question Text *Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?*

Assets Covered 90612

162. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.P, 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c))

Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?*

Assets Covered 90612

Result Notes Timeframes added to Section 7.5 during this inspection.

TD.CPMONITOR: External Corrosion - CP Monitoring

163. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.P, 192.605(b)(2) (192.463(a), 192.463(c))

Question Text *Does the process require CP monitoring criteria to be used that is acceptable?*

Assets Covered 90612

164. Question Result, ID, References Sat, TD.CPMONITOR.TEST.P, 192.605(b)(2) (192.465(a))

Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*

Assets Covered 90612

165. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.P, 192.605(b)(2) (192.465(b))

Question Text *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?*

Assets Covered 90612

Result Notes Attachment B P15. Added during this inspection.

166. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.P, 192.605(b)(2) (192.465(c))

Question Text *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?*

Assets Covered 90612

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

167. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.P, 192.605(b)(2) (192.465(d))

Question Text *Does the process require that the operator promptly correct any identified deficiencies in corrosion control?*

Assets Covered 90612

168. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.P, 192.469

Question Text *Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?*

Assets Covered 90612

Result Notes Solvay's pipeline is only 481' in length.

169. Question Result, ID, References NA, TD.CPMONITOR.TESTLEAD.P, 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c))

Question Text *Does the process provide adequate instructions for the installation of test leads?*

Assets Covered 90612

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

170. Question Result, ID, References NA, TD.CPMONITOR.INTFRCURRENT.P, 192.605(b)(2) (192.473(a))

Question Text *Does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system and does the process for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*

Assets Covered 90612

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

171. Question Result, ID, **Sat**, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c)) (also presented in: TD.CP, References TD.CPEXPOSED)
Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*
Assets Covered **90612**

TD.CP: External Corrosion - Cathodic Protection

172. Question Result, ID, References **Sat**, TD.CP.POST1971.P, 192.605(b)(2) (192.455(a), 192.457(a), 192.452(a), 192.452(b))
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
Assets Covered **90612**
173. Question Result, ID, References **NA**, TD.CP.PRE1971.P, 192.605(b)(2) (192.457(b))
Question Text *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found?*
Assets Covered **90612**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
174. Question Result, ID, References **NA**, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e))
Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*
Assets Covered **90612**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
175. Question Result, ID, References **Sat**, TD.CP.ELECISOLATE.P, 192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))
Question Text *Does the process give adequate guidance for electrically isolating 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?*
Assets Covered **90612**
176. Question Result, ID, References **Sat**, TD.CP.CASINGINSPECT.P,
Question Text *Does the process give sufficient direction for conducting annual casing inspections to ensure electrical isolation from the pipeline?*
Assets Covered **90612**
Result Notes **Solvay uses 100mv of potential difference to determine if a casing may be shorted to the carrier.**
177. Question Result, ID, References **NA**, TD.CP.FAULTCURRENT.P, 192.605(b)(2) (192.467(f))
Question Text *Does the process give sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?*
Assets Covered **90612**
Result Notes **No such requirement existed in the scope of inspection review.**
178. Question Result, ID, References **Sat**, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c)) (also presented in: TD.CP, References TD.CP.MONITOR, TD.CPEXPOSED)
Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*
Assets Covered **90612**

TD.COAT: External Corrosion - Coatings

179. Question Result, ID, References **Sat**, TD.COAT.NEWPIPE.P, 192.605(b)(2) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))

Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?*

Assets Covered 90612

180. Question Result, ID, References Sat, TD.COAT.NEWPIPEINSTALL.P, 192.605(b)(2) (192.461(c), 192.461(d), 192.461(e), 192.483(a))

Question Text *Does the process give adequate guidance for the application and inspection of protective coatings on pipe?*

Assets Covered 90612

Result Notes Attachment B P3. Added during this inspection.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

181. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 192.605(b)(2) (192.459)

Question Text *Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination is required to determine the extent of the corrosion?*

Assets Covered 90612

Result Notes No procedure found

182. Question Result, ID, References Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c))

Question Text *Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?*

Assets Covered 90612

183. Question Result, ID, References Sat, TD.CPEXPOSED.EXTCORRODREPAIR.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c))

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered 90612

Result Notes All pipe will be replaced as a cylinder based on R-STRENG calculations of remaining strength.

184. Question Result, ID, References Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c)) (also presented in: TD.CPMONITOR, TD.CP)

Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*

Assets Covered 90612

TD.ICP: Internal Corrosion - Preventive Measures

185. Question Result, ID, References Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b))

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered 90612

Result Notes Page 20

186. Question Result, ID, References Sat, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.485(c))

Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*

Assets Covered 90612

187. Question Result, ID, References Sat, TD.ICP.REPAIR.P, 192.491(c) (192.485(a), 192.485(b))

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*

Assets Covered 90612

TD.ICCG: Internal Corrosion - Corrosive Gas

188. Question Result, ID, References **Sat, TD.ICCG.CORRGAS.P, 192.605(b)(2) (192.475(a))**
 Question Text *Does the process require that the corrosive effect of the gas in the pipeline be investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*
 Assets Covered **90612**
 Result Notes **Solvay added a statement on page 34 of their O&M manual during this inspection. Solvay has no known corrosion history. Solvay plans on conducting a UT inspection of their pipeline to measure wall thickness to establish a baseline for future internal corrosion evaluations.**
189. Question Result, ID, References **NA, TD.ICCG.CORRGASACTION.P, 192.605(b)(2) (192.477)**
 Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*
 Assets Covered **90612**
 Result Notes **No such requirement existed in the scope of inspection review.**

TD.SP: Special Permits

190. Question Result, ID, References **NA, TD.SP.CONDITIONS.P, 190.341(d)(2)**
 Question Text *Has a process been developed as necessary for complying with the special permit conditions?*
 Assets Covered **90612**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.QU: Qualification of Personnel - Specific Requirements

191. Question Result, ID, References **Sat, 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 **90612**
192. Question Result, ID, References **NA, 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 **90612**
 Result Notes **No such requirement existed in the scope of inspection review.**
193. 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 **90612**

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

194. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 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 **90612**
195. Question Result, ID, References **NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))**

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 90612

Result Notes No such activity/condition was observed during the inspection. There are no Appendix C welders.

TQ.TR: Training of Personnel

196. Question Result, ID, References Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))

Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*

Assets Covered 90612

Result Notes Solvay has a training program that requires personal to review all emergency procedures annually. This includes procedure HSE-3307-I Flammable Gas Leak.

197. 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 90612

Result Notes Added a procedure to evaluate emergency response at the time of this inspection. Solvay has never had an emergency.

GENERIC.GENERIC: Generic Questions

198. Question Result, ID, References Sat, GENERIC.GENERIC.GENPROCEDURE.P, N/A

Question Text *Generic question - please provide context in result notes.*

Assets Covered 90612

Result Notes Solvay was using a Heath DetectoPak 4 to conduct their leak surveys. A DP-4 is not capable of detecting hydrogen. Solvay's contractor, Northwest Metal Fab and Pipe is their leak survey contractor and also provides the instrumentation for their surveys.

At the time of this inspection staff (UTC) requested documentation from Heath that the DP-4 was approved for hydrogen gas since hydrogen is not a hydrocarbon. Heath personnel stated that it was not an approved instrument for hydrogen detection.

Solvay's contractor purchased a new leak detection instrument approved for hydrogen leak detection and Solvay revised their leak survey procedures including equipment use and calibration.

199. Question Result, ID, References NA, GENERIC.GENERIC.GENRECORD.R, N/A

Question Text *Generic question - please provide context in result notes.*

Assets Covered 90612

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

Report Parameters: Results: all

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