

# 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	8602 - McChord - O&M PnP	Operator(s)	MCCHORD PIPELINE CO. (31049) Lead David Cullom	Plan Submitted	01/06/2023
Status	PLANNED	Observer(s)	Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Tom Green, Jason Hoxit	Plan Approval	01/08/2023 by Scott Rukke
Start Year	2023	Supervisor	Dennis Ritter	All Activity Start	09/26/2023
System Type	HL	Director	Scott Rukke	All Activity End	10/19/2023
Protocol Set ID	WA.HL.2022.02			Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope

This inspection was a review of the Operations and Maintenance Manual(s) for several types of programs, plans, and procedures.

### Summary of the system

LF Pre-70 ERW mileage is at 13.25. The remaining 1 mile is not LF Pre-70 ERW. The McChord Pipeline is a buried intrastate pipeline 14.25 miles in length, constructed in 1966 with 6-inch nominal steel pipe grade B, wall thickness of 0.188 inch to 0.432 inch. A one mile reroute was performed in 1996. The pipeline has a 720 psig MOP (36% SMYS) with a normal operating pressure at 450 psig (21% SMYS). The pipeline is divided into four sections with isolation valves between each section. The entire pipeline has about 400 foot elevation differential. The pipeline transports jet fuel from US Oil Refinery located in Tacoma near Commencement Bay to the McChord Air Base storage facility. Jurisdiction begins at the pump suction valves (P-1401) and ends at the custody transfer manifold valves downstream of the meters at McChord Air Force Base. The pipeline was hydrostatically tested in 1996, inline inspected in 2004 (GE pig), and MFL runs were completed in 2009, 2014 and 2019. Prior to each run they evaluate the tool to make sure complementary technologies are used. Tuboscope was used in 1996. GE used UT in 2004. In 2005, there was a pressure cycle analysis done by Kiefner and Assoc. along with the LF Pre-70 ERW study. In 2009, a MFL pig was run by Baker Hughes. Threats, such as seam integrity due to low frequency pre-1970 ERW pipe and also third party damage, were discussed and documentation reviewed. Keifner and Associates also performed a study on the seam threat and ruled it out as a major threat to the system's safe operation. In regards to the third party damage threat, the August 2, 2017 incident (Sefnco) was discussed along with the prompt detection of the leak by the CPM. The quick shutdown and response time by the operator were also discussed in this inspection. The line is due for another ILI run in 2024. BOT/RTs were included per request in the inspection plan, but this system has no jurisdictional break out tanks. McChord's integrity management program considers all of its pipeline to be in a HCA or a HCA CA given its location and proximity to HPAs, CNWs, ecological and drinking water USAs.

### Facilities visited and Total AFOD

Facilities were not visited for the Operations and Maintenance (O&M) Plans and Procedures Review. This inspection was 3 AFODs.

### Summary of Significant Findings

There were no Areas of Concern or Probable Violations noted during this inspection.

Primary Operator contacts and/or participants

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## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88980 (72)	McChord Pipeline Company	unit	88980	BOT/RT Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress Abandoned	135	135	135	135	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. 88980 (72)	WUTC O&M Inspection	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, 114, GENERIC	P, R, O, S	Detail --
2. 88980 (72)	WUTC O&M Inspection	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, 114, GENERIC	P, R, O, S	Detail --

## Plan Implementations

# Activity Name	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1. Review O&M (On-site portion)	--	09/26/2023 10/19/2023	--	all planned questions	88980 (72)	all types	135	135	135	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

This inspection has no Form data entry.

## Results (all values, 135 results)

160 (instead of 135) results are listed due to re-presentation of questions in more than one sub-group.

## AR.RMP: Repair Methods and Practices

1. Question Result, ID, References **Sat, AR.RMP.SAFETY.P, 195.402(c)(14) (195.422(a), 195.452(h)(1))**  
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 **88980 (72)**  
Result Notes **This process is in the Maintenance Manual E-12 in Section 2 and I-1. (Hazardous Work Permits)**

## **CR.SCADA: Supervisory Control and Data Acquisition**

2. Question Result, ID, References **Sat, CR.SCADA.SETPOINT.P, 195.446(c)(2) (195.406(b))**  
Question Text *Does the process adequately define safety-related points?*  
Assets Covered **88980 (72)**  
Result Notes **This process is contained in the Maintenance Manual D-5 in Section 1.5 . It is also in Section 1.1.**

## **CR.LD: Leak Detection (Non-CPM)**

3. Question Result, ID, References **Sat, CR.LD.LDEVAL.P, 195.444(a) (195.444(b), 195.452(i)(3))**  
Question Text *Does the process adequately address the evaluation of the operators leak detection system and require modification as necessary?*  
Assets Covered **88980 (72)**  
Result Notes **Section 9.2. There is a paragraph discussing the topic.**
4. Question Result, ID, References **Sat, CR.LD.LDEFFECTIVE.P, 195.402(a) (195.134(a), 195.134(b), 195.444(a), 195.444(b))**  
Question Text *Do the processes adequately describe that the operator has an effective system for detecting leaks?*  
Assets Covered **88980 (72)**  
Result Notes **Section 9.2 contains this process.**
5. Question Result, ID, References **Sat, CR.LD.LDTRAINING.P, 195.505(h)**  
Question Text *Do the processes define and require that pipeline controllers are trained to recognize leaks based on the system implemented?*  
Assets Covered **88980 (72)**  
Result Notes **This process is in the Administrative Manual B1. The A reformer and the East Pumper are trained.**
6. Question Result, ID, References **Sat, CR.LD.ALARMDISPLAY.P, 195.444(b)**  
Question Text *Do the processes define and describe the alarms appropriate for the leak detection system implemented?*  
Assets Covered **88980 (72)**  
Result Notes **This is contained in the Operations Manual I-3 (Pressures) Section IV - Abnormal Operations IV-1 Transfer State IV-2 Non Transfer State.**
7. Question Result, ID, References **Sat, CR.LD.LDSTEST.P, 195.444(b) (195.134(b))**  
Question Text *Do the processes define and describe the testing of the Leak Detection System?*  
Assets Covered **88980 (72)**  
Result Notes **These processes are in the Maintenance Manual D-17 in Section 2 and Section D-5 (Pressure limiting and control devices Part 1.1 and Part 1.5)**
8. Question Result, ID, References **Sat, CR.LD.LDSMOC.P, 195.444(b) (195.134(b))**  
Question Text *Are parameter and/or system changes required to be reflected in the leak detection system?*  
Assets Covered **88980 (72)**  
Result Notes **The Maintenance Manual D-17 Section 1.2 contains this process.**
9. Question Result, ID, References **Sat, CR.LD.LDSCADA.P, 195.134(b) (195.444(b))**

Question Text *Are the leak detection system data, communication, and controller interfaces appropriately integrated with the SCADA displays?*

Assets Covered 88980 (72)

Result Notes The Operations Manual I-3 (Controls and Protective Devices) contains this procedure.

10. Question Result, ID, References Sat, CR.LD.LDSINSTRUMENT.P, 195.134(b) (195.444(b))

Question Text *Is the accuracy and calibration of field instrumentation used in the leak detection system appropriately assured?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual, in Section D-4, contains this process. (Proving) It is also in Exhibit A of Section D-1.

11. Question Result, ID, References Sat, CR.LD.LDSPROTECT.P, 195.402(a)

Question Text *Is the Leak Detection System adequately protected from security threats?*

Assets Covered 88980 (72)

Result Notes During the control room audit, this was covered. It is in a TWIC access area. It is not connected to the intranet.

## DC.CO: Construction

12. Question Result, ID, References Sat, DC.CO.ASMECONSTRUCTION.P,

Question Text *Do the operator's written design and construction specifications conform to the requirements in ASME B31.4?*

Assets Covered 88980 (72)

Result Notes Section E-2 Maintenance Manual Section 1.1 contains this process.

13. Question Result, ID, References Sat, DC.CO.VALVELOCATION.P, 195.202 (195.260(a), 195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))

Question Text *Does the process specify that valves are located as specified by 195.260?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual D-3 Section 1.4 contains this process.

## DC.COCMP: Construction - Pump Stations

14. Question Result, ID, References Sat, DC.COCMP.VALVELOCATION.P, 195.202 (195.260(a), 195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))

Question Text *Does the process specify that valves are located as specified by 195.260?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual Section D-3 contains this process.

15. Question Result, ID, References NA, DC.COCMP.PMPPROPERTY.P,

Question Text *Does the operator's procedure require that pump stations be designed, sited, and constructed consistent with the requirements in WAC 480-75-380?*

Assets Covered 88980 (72)

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

## DC.WELDINS: Construction Weld Inspection

16. Question Result, ID, References Sat, DC.WELDINS.WELDINSPECT.P, 195.228(a) (195.228(b)) (also presented in: TDC.WELDINS)

Question Text *Are welds required to be inspected to ensure compliance with the requirements of 195.228?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 7 contains this.

17. Question Result, ID, References Sat, DC.WELDINS.WELDREPAIR.P, 195.202 (195.230(a), 195.230(b), 195.230(c)) (also presented in: TDC.WELDINS)

Question Text *Are welds that are unacceptable required to be removed and/or repaired as specified by 195.230 and are repair procedures in place?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 7 contains this process.

18. Question Result, ID, Sat, DC.WELDINSR.WELDNDT.P, 195.234(a) (195.234(b), 195.234(c)) (also presented in: References TDC.WELDINSR)

Question Text *Are there processes for nondestructive testing and for determining standards of acceptability?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 7.5 contains this process.

19. Question Result, ID, Sat, DC.WELDINSR.WELDNDTQUAL.P, 195.202 (195.234(b)(2)) (also presented in: TDC.WELDINSR) References

Question Text *Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel who are trained in procedures established to ensure compliance with 195.228 and in use of the testing equipment?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 7.4 and 7.5.4 contains this process.

20. Question Result, ID, Sat, DC.WELDINSR.GIRTHWELDNDT.P, 195.202 (195.234(d), 195.234(e), 195.234(f), 195.234(g), References 195.266) (also presented in: TDC.WELDINSR)

Question Text *Does the process require certain girth welds to be nondestructively tested in accordance with 195.234(d), (e), (f), and (g)?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 7.2.2 contains this process for repaired portions at 100%. All new girth welds will be tested at 100%

## DC.WELDERQUAL: Construction Welder Qualification

21. Question Result, ID, Sat, DC.WELDERQUAL.WELDERQUAL.P, 195.222(a) (195.222(b)) (also presented in: TDC.WELDERQUAL) References

Question Text *Is each welder required to be qualified in accordance with section 6 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 1 contains this process.

## DC.WELDPROCEDURE: Construction Welding Procedures

22. Question Result, ID, Sat, DC.WELDPROCEDURE.WELD.P, 195.214(a) (also presented in: TDC.WELDPROCEDURE) References

Question Text *Does the process require welding to be performed by qualified welders using qualified welding procedures?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 1 contains this process.

23. Question Result, ID, Sat, DC.WELDPROCEDURE.WELDPROCEDURE.P, 195.214(b) (also presented in: TDC.WELDPROCEDURE) References

Question Text *Are welding procedures and qualifying tests required to be recorded in detail?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 1.3 contains this process.

24. Question Result, ID, Sat, DC.WELDPROCEDURE.ARCBURNGRNDWIRE.P, 195.202 (195.226(a), 195.226(b), 195.226(c)) (also presented in: TDC.WELDPROCEDURE) References

Question Text *Does the process address arc burns and ground wires in accordance with 195.226?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 2.2 contains this process.

25. Question Result, ID, Sat, DC.WELDPROCEDURE.WELDINSERVICE.P, 195.402(a) (195.422(a,)) (also presented in: References TDC.WELDPROCEDURE)

Question Text *Does the process require consideration of issues related to welding on in-service pipelines?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 5 contains this process.

## DC.DN: Design

26. Question Result, ID, References Sat, DC.DN.DESIGNPRESS.P, 195.106(a) (195.106(b), 195.106(c), 195.106(d), 195.106(e)) (also presented in: TDC.TKPIPING)  
Question Text *Does the process require the internal design pressure of the pipeline (or pipe) be determined in accordance with 195.106?*  
Assets Covered 88980 (72)  
Result Notes This process is in the Maintenance Manual G-3 Section 4.1.
27. Question Result, ID, References Sat, DC.DN.NEWPIPE.P, 195.112(a) (195.112(b), 195.112(c))  
Question Text *Does the process require that new pipe installed in a pipeline system comply with 195.112?*  
Assets Covered 88980 (72)  
Result Notes This process is in the Maintenance Manual B-3 Section 4.
28. Question Result, ID, References Sat, DC.DN.ILIPASS.P, 195.202 (195.120(a), 195.120(b), 195.120(c), 195.120(d))  
Question Text *Does the process require the pipeline be designed and constructed to accommodate the passage of instrumented internal inspection devices?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual E Section 11 "Design and Repair Procedures" contains this process.
29. Question Result, ID, References Sat, DC.DN.LDDESIGN.P, 195.134(a) (195.134(b), 195.134(c), 195.444(a), 195.444(b), 195.444(c))  
Question Text *Are newly constructed pipeline segments required to have a leak detection system that protects the public, property, and the environment?*  
Assets Covered 88980 (72)  
Result Notes No new segments, but the Maintenance Manual Section D-17 addresses the installation of new CPM in Section 1.3.

## DC.MO: Maintenance and Operations

30. Question Result, ID, References Sat, DC.MO.SAFETY.P, 195.402(a) (195.422(a), 195.402(c)(14))  
Question Text *Does the process ensure that pipeline maintenance construction and testing activities are made in a safe manner and are made so as to prevent damage to persons and property?*  
Assets Covered 88980 (72)  
Result Notes Maintenance Manual E-12 Section 1 (Policy) and Section 2 (Hazard Recognition).
31. Question Result, ID, References Sat, DC.MO.MOVE.P, 195.402(a) (195.424(a), 195.424(b), 195.424(c))  
Question Text *Has a process been developed for pipeline movements in accordance with 195.424?*  
Assets Covered 88980 (72)  
Result Notes Section E-15 Contains references to API RP 1117.

## DC.PT: Pressure Testing

32. Question Result, ID, References Sat, DC.PT.PRESSTEST.P, 195.402(c) (195.302(a), 195.304, 195.305, 195.306, 195.310)  
Question Text *Does the process have adequate test procedures?*  
Assets Covered 88980 (72)  
Result Notes Maintenance manual. Section - G-3 Hydrostatic Pressure Test.
33. Question Result, ID, References Sat, DC.PT.PRESSTESTTIEIN.P, 195.402(c) (195.308)  
Question Text *Does the process require testing of pipe associated with tie-ins, either with the section to be tied in or separately?*

Assets Covered 88980 (72)  
Result Notes Maintenance Manual G-3 Section 1.4 contains this.

34. Question Result, ID, References Sat, DC.PT.PRESSTESTRPT.P,  
Question Text *Is there a process to file a report with the commission at least 45 days prior to pressure testing when increasing the MOP of the pipeline?*  
Assets Covered 88980 (72)  
Result Notes Maintenance Manual G-3 Section 1.5 contains this.

## EP.ERL: Emergency Response Liquids

35. Question Result, ID, References Sat, EP.ERL.ACCIDENTANALYSIS.P, 195.402(a) (195.402(c)(5), 195.402(c)(6))  
Question Text *Does the O&M plan include processes for analyzing pipeline accidents to determine their causes?*  
Assets Covered 88980 (72)  
Result Notes This is contained in the Administrative Manual. Section A-4 is also referenced in the USOR PSM Safety Procedure #3.
36. Question Result, ID, References Sat, EP.ERL.LIAISON.P, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4)  
Question Text *Does the O&M plan include processes for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?*  
Assets Covered 88980 (72)  
Result Notes This is contained in the Administrative Manual. Section G-1 is the Public Awareness Portion 4C Emergency Officials. Message is 4C1.
37. Question Result, ID, References Sat, EP.ERL.NOTICES.P, 195.402(a) (195.402(e)(1))  
Question Text *Does the emergency plan include processes for receiving, identifying, and classifying notices of events which need immediate response and providing notice to operator personnel or to fire, police or other appropriate officials, as appropriate, for corrective action?*  
Assets Covered 88980 (72)  
Result Notes The Operations Manual in Section II Part 1.4 contains this. It states the P/G East or the "A" reformer will notify the Shift Supervisor.
38. Question Result, ID, References Sat, EP.ERL.RESPONSE.P, 195.402(a) (195.402(c)(4), 195.402(c)(6), 195.402(e)(2), 195.402(e)(10))  
Question Text *Does the emergency plan include processes for making a prompt and effective response to a notice of each type of emergency, fire, explosion, accidental release of a hazardous liquid, operational failure (including cyber-attacks), or natural disaster affecting the pipeline?*  
Assets Covered 88980 (72)  
Result Notes The Operations Manual in Section II Appendix 11 contains this.
39. Question Result, ID, References Sat, EP.ERL.READINESS.P, 195.402(a) (195.402(e)(3))  
Question Text *Does the emergency plan include processes to ensure the availability of personnel, equipment, instruments, tools, and materials as needed at the scene of an emergency?*  
Assets Covered 88980 (72)  
Result Notes The Operations Manual in Section II Appendix 11 contains this.
40. Question Result, ID, References Sat, EP.ERL.RELEASEREDUCE.P, 195.402(a) (195.402(e)(4))  
Question Text *Does the emergency plan include processes for taking necessary action; such as an emergency shutdown or pressure reduction, to minimize the volume released from any section of a pipeline system in the event of a failure?*  
Assets Covered 88980 (72)  
Result Notes The Operations Manual in Section II Appendix 11 contains this.
41. Question Result, ID, References Sat, EP.ERL.HAZREDUCE.P, 195.402(a) (195.402(c)(11), 195.402(e)(5))



Question Text *Does the emergency plan include processes for controlling the release of liquid at an accident scene to minimize the hazards, including possible ignition in the cases of flammable HVLS?*

Assets Covered 88980 (72)

Result Notes The Operations Manual in Section II Appendix 11 contains this.

42. Question Result, ID, References Sat, EP.ERL.PUBLICHAZ.P, 195.402(a) (195.402(e)(6))

Question Text *Does the emergency plan include procedures for minimizing public exposure to injury and probability of accidental ignition by assisting with evacuation, assisting with halting traffic on roads and railroads, or taking other appropriate action?*

Assets Covered 88980 (72)

Result Notes This is in the Operations Manual in Section II Appendix 11 and Part 5 of Section 3.7.

43. Question Result, ID, References Sat, EP.ERL.AUTHORITIES.P, 195.402(a) (195.402(e)(7))

Question Text *Does the emergency plan include processes for notifying fire, police, and other appropriate public officials of hazardous liquid emergencies and coordinating with them preplanned and actual responses during an emergency, including additional precautions necessary for an emergency involving HVLS?*

Assets Covered 88980 (72)

Result Notes These processes are contained in the Operations Manual in Section II Part Appendix 11. Section 3.7.1.

44. Question Result, ID, References Sat, EP.ERL.POSTEVNTREVIEW.P, 195.402(a) (195.402(e)(9))

Question Text *Does the emergency plan include processes for providing for a post-accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found?*

Assets Covered 88980 (72)

Result Notes This is discussed in the Administrative Manual C-2 in Part 5.

45. Question Result, ID, References Sat, EP.ERL.COMMSYS.P, 195.408(a) (195.408(b))

Question Text *Does the process address emergency communication system(s)?*

Assets Covered 88980 (72)

Result Notes This is discussed in the Administrative Manual C-2 in Part 4.

## FS.FG: Facilities General

46. Question Result, ID, References NA, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: PD.SN)

Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*

Assets Covered 88980 (72)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Maint Manual D-2 Section 4 discusses line markers however.

47. Question Result, ID, References Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: PD.SN)

Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*

Assets Covered 88980 (72)

Result Notes This is discussed in the Maintenance Manual D-10 in Section 2.7.

48. Question Result, ID, References Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: PD.SN)

Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*

Assets Covered 88980 (72)

Result Notes This is discussed in the Maintenance Manual D-10 in Section 4.

49. Question Result, ID, References Sat, FS.FG.FIREPROT.P, 195.402(c)(3) (195.430(a), 195.430(b), 195.430(c))

Question Text *Does the process require firefighting equipment at pump station/breakout tank areas?*

Assets Covered 88980 (72)



Result Notes This is discussed in the Maintenance Manual D-14 in Section 1.4.

## MO.LO: Liquid Pipeline Operations

50. Question Result, ID, References Sat, MO.LO.OMMANUAL.P, 195.402(a) (195.402(c))  
Question Text *Does the operator have an O&M manual, and has a procedure to properly maintain all portions of the manual?*  
Assets Covered 88980 (72)  
Result Notes This is contained in the Maintenance Manual Introduction in Section 3.0.
51. Question Result, ID, References Sat, MO.LO.OMHISTORY.P, 195.402(a) (195.402(c)(1), 195.404(a), 195.404(a)(1), 195.404(a)(2), 195.404(a)(3), 195.404(a)(4), 195.404(c)(1), 195.404(c)(2), 195.404(c)(3))  
Question Text *Does the process address making construction records, maps, and operating history available as necessary for safe operation and maintenance?*  
Assets Covered 88980 (72)  
Result Notes This is in the Maintenance Manual D6 in Section 6. - It states the company will maintain records and maps.
52. Question Result, ID, References Sat, MO.LO.OMEFFECTREVIEW.P, 195.402(a) (195.402(c)(13))  
Question Text *Does the process address periodically reviewing the work done by the operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual in B-1 contains as-built record maintenance procedures.
53. Question Result, ID, References Sat, MO.LO.SRCR.P, 195.402(a) (195.402(f), 195.55(a))  
Question Text *Does the procedure include instructions that allow personnel to recognize safety related conditions?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual in Section E-13 contains this process.
54. Question Result, ID, References Sat, MO.LO.PRESSTESTREQ.P, 195.402(c)(3) (195.302(b), 195.302(c))  
Question Text *Does the procedure require pressure testing for all lines except as allowed by 195.302(b)?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual in Section G-3 contains this process.
55. Question Result, ID, References Sat, MO.LO.OPRECORDS.P, 195.402(a) (195.402(c)(3), 195.404(b))  
Question Text *Does the process include requirements that operating records that relate to 195.402 activities be maintained?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual D-1 in Section 1.7 contains this.

## MO.LOOPER: Liquid Pipeline Startup and Shutdown Operations

56. Question Result, ID, References Sat, MO.LOOPER.PRESSURELIMIT.P, 195.402(a) (195.402(c)(7))  
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 limits prescribed by 195.406?*  
Assets Covered 88980 (72)  
Result Notes Operations Manual Section III. Flow Diagrams, operating description. Start up pre startup shutdown.
57. Question Result, ID, References Sat, MO.LOOPER.FAILSAFE.P, 195.402(a) (195.402(c)(8))  
Question Text *In the case of a pipeline that is not equipped to fail safe, does the process include procedures for monitoring from an attended location pipeline pressure during startup until steady state pressure and flow conditions are reached and during shut-in to assure operation within the limits of 195.406?*  
Assets Covered 88980 (72)

Result Notes Appendix 14 is the VECO study that addresses the pump curve and surge analysis.

## MO.LMOPP: Liquid Pipeline Overpressure Protection

58. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.P, 195.402(c)(3) (195.428(a)) (also presented in: FS.PS)  
Question Text *Does the process adequately detail the inspecting and testing of each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual D-5 discusses pressure limiting and relief devices. Veco also performed a study on the pump curve and surge pressure.

## MO.LOMOP: Liquid Pipeline MOP

59. Question Result, ID, References Sat, MO.LOMOP.MOPDETERMINE.P, 195.402(c)(3) (195.302(c), 195.406(a))  
Question Text *Does the process include procedures for establishing the maximum operating pressure allowed in accordance with 195.406(a)?*  
Assets Covered 88980 (72)  
Result Notes This is in the Maintenance Manual Section G-3 in Section 1.1.

## MO.LMOPP: Liquid Pipeline Overpressure Protection

60. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.P, 195.402(c)(3) (195.426) (also presented in: FS.PS)  
Question Text *Does the process include requirements for relief devices and their proper use for launchers and receivers?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual D-16. in Section 1.3 contains this process.
61. Question Result, ID, References Sat, MO.LMOPP.SURGEANALYSIS.P,  
Question Text *Is there a process to conduct a surge analysis to ensure that the surge pressure does not exceed one hundred ten percent of the MOP?*  
Assets Covered 88980 (72)  
Result Notes The Maintenance Manual D-5. in Section 1.8 contains this process.

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

62. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMAL.P, 195.402(a) (195.402(d)(1))  
Question Text *Does the process include procedures for responding to, investigating, and correcting the cause of the listed abnormal operating conditions?*  
Assets Covered 88980 (72)  
Result Notes Maintenance Manual Section Section IV

Leaks, Valve closures, loss of communications, vapor and liquid releases, unintended shutdown, .etc are all covered.

## MO.LM: Liquid Pipeline Maintenance

63. Question Result, ID, References Sat, MO.LM.VALVEMAINBIANN.P, 195.402(c)(3) (195.420(b)) (also presented in: FS.VA)  
Question Text *Does the process address inspecting each mainline valve?*  
Assets Covered 88980 (72)  
Result Notes Maint manual D-3 Section 1 Section 2 Valve Inspection
64. Question Result, ID, References Sat, MO.LM.VALVEMAIN.P, 195.402(c)(3) (195.420(a)) (also presented in: FS.VA)

Question Text *Does the process adequately address the maintenance program for each valve that is necessary for safe operation of the pipeline system?*

Assets Covered 88980 (72)

Result Notes Maint manual D-3 Section 1 Section 2 Valve Inspection

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

65. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALCHECK.P, 195.402(a) (195.402(d)(2))

Question Text *Does the process include procedures for checking variations from normal operation after abnormal operations have ended at sufficient locations in the system to determine continued integrity and safe operations?*

Assets Covered 88980 (72)

Result Notes Maintenance Manual Section Section IV A (repressurization of the line after shutdown is covered)

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

66. Question Result, ID, References Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: PD.RW)

Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*

Assets Covered 88980 (72)

Result Notes In Maintenance Manual D-2 Section 1.

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

67. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALCORRECT.P, 195.402(a) (195.402(d)(3))

Question Text *Does the process include procedures for correcting variations from normal operation of pressure and flow equipment and controls?*

Assets Covered 88980 (72)

Result Notes Maintenance Manual Section Section IV Series of procedures discuss what to do. The flow totalizers are used to calculate a 15 minute interval. Meter readings are recorded. Depressurization then conducted and the MPL inspector is notified

## MO.LM: Liquid Pipeline Maintenance

68. Question Result, ID, References Sat, MO.LM.VALVEPROTECT.P, 195.402(c)(3) (195.420(c)) (also presented in: FS.VA)

Question Text *Does the process contain criteria for providing protection for each valve from unauthorized operation and from vandalism?*

Assets Covered 88980 (72)

Result Notes Maint manual D-3 Section 2.5 2.6

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

69. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 1162, Section 8) (also presented in: PD.RW)

Question Text *Does the process address how line markers are to be placed and maintained?*

Assets Covered 88980 (72)

Result Notes In the Maintenance Manual D-2 (Section 4). Specifically, 4.1 has the required locations.

## MO.ABNORMAL: Liquid Pipeline Abnormal Operations

70. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALNOTIFY.P, 195.402(a) (195.402(d)(4))

Question Text *Does the process include procedures for ensuring operating personnel notify responsible operator personnel where notice of an abnormal operation is received?*

Assets Covered 88980 (72)

Result Notes Maintenance Manual Section IV The SS and the MPL inspector are contacted prior to restarting.

71. Question Result, ID, References Sat, MO.ABNORMAL.ABNORMALREVIEW.P, 195.402(a) (195.402(d)(5))

Question Text *Does the process include procedures for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures for controlling abnormal operation and taking corrective action where deficiencies are found?*

Assets Covered 88980 (72)

Result Notes Operations Manual II Section 1.3 states the SS will review work to determine the effectiveness of procedures.

## MO.RW: ROW Markers, Patrols, Monitoring and Analysis

72. Question Result, ID, References Sat, MO.RW.DEPTHSURVEY.P,

Question Text *Is there a process to conduct depth of cover surveys as required by WAC 480-75-640?*

Assets Covered 88980 (72)

Result Notes This is in the Maintenance Manual D-2 Section 5. The depth of cover survey is conducted in conjunction with the scheduling chart "D-1".

73. Question Result, ID, References Sat, MO.RW.CHANGEINCLASS.P,

Question Text *Is there a process to reevaluate class location periodically, but not less often than once every five years?*

Assets Covered 88980 (72)

Result Notes The Integrity Management Plan in Section 5.2 contains this is in the last paragraph.

## MO.LC: Liquid Conversion

74. Question Result, ID, References NA, MO.LC.CONVERSION.P, 195.5(a) (195.5(b), 195.5(c), 195.5(d))

Question Text *If any pipelines were converted into Part 195 service, was a process developed addressing all the applicable requirements?*

Assets Covered 88980 (72)

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

## MO.EW: Extreme Weather

75. Question Result, ID, References Sat, MO.EW.EXTWEATHERCRIT.P, 195.402(a) (195.414(a))

Question Text *Does the process adequately detail the specific weather or natural disaster conditions that would require an inspection?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual D-2 Section 1.2 contains this process.

76. Question Result, ID, References Sat, MO.EW.EXTWEATHERINSPREQT.P, 195.402(a) (195.414(b), 195.414(c))

Question Text *Does the process adequately detail initial inspection requirements?*

Assets Covered 88980 (72)

Result Notes Maint Manual D-2 Sect 1.2

77. Question Result, ID, References Sat, MO.EW.EXTWEATHERREMEDIAL.P, 195.402(a) (195.414(d))

Question Text *Does the process adequately detail remedial action requirements?*

Assets Covered 88980 (72)

Result Notes Maint manual D2 Section 6. FU action report is conducted.

## PD.DP: Damage Prevention

78. Question Result, ID, References **Sat, PD.DP.ONECALL.P, 195.442(a) (195.442(b))**  
 Question Text *Does the process require participation in qualified one-call systems?*  
 Assets Covered **88980 (72)**  
 Result Notes **Maint manual J-6 discusses participation.**
79. Question Result, ID, References **Sat, PD.DP.PROGRAM.P, 195.442(a)**  
 Question Text *Does the operator have a damage prevention program approved and in place?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual G-1.**
80. Question Result, ID, References **Sat, PD.DP.PUBLICNOTIFY.P, 195.442(a) (195.442(c)(2))**  
 Question Text *Does the process include public notification requirements?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual G-1. Section 2**
81. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.P, 195.442(a) (195.442(b), 195.442(c)(4), 195.442(c)(5))**  
 Question Text *Does the process require marking proposed excavation sites?*  
 Assets Covered **88980 (72)**  
 Result Notes **Maint Manual J-6 Section 2.6.3**
82. Question Result, ID, References **Sat, PD.DP.EXCAVATE.P, 195.442(a) (195.442(c)(6))**  
 Question Text *Does the process include inspection of pipelines that could be damaged by excavation activities?*  
 Assets Covered **88980 (72)**  
 Result Notes **Maint Manual J-6 Section 2.6.5**
83. Question Result, ID, References **Sat, PD.DP.TPD.P, 195.442(a) (195.442(b), 195.442(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 **88980 (72)**  
 Result Notes **Paradigm uses data from MPL and a 5 mile buffer on either side to contact plus a new contact list.**
84. Question Result, ID, References **Sat, PD.DP.TPDONECALL.P, 195.442(a) (195.442(b), 195.442(c)(3))**  
 Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual D1 Section 10 discusses the SEFNCO issue and that the damages were checked against One Call tickets. An inspector is onsite if a One Call ticket is available.**
85. Question Result, ID, References **Sat, PD.DP.NOTICETOEXCAVATOR.P,**  
 Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Administrative Manual (D-1) Section 10.2 contains this process.**
86. Question Result, ID, References **Sat, 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 480-75-630(6)?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Administrative Manual (D-1) Section 10.3 contains this process.**
87. Question Result, ID, References **Sat, PD.DP.LOCATES.P,**  
 Question Text *Is there a process to locate hazardous liquid pipelines within the timeframe outlined in RCW 19.122?*  
 Assets Covered **88980 (72)**

Result Notes The Maintenance Manual Section J-6 contains this process. Locate procedures are discussed in detail.

## PD.PA: Public Awareness

88. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 195.440(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 **88980 (72)**  
Result Notes **MPL Public Awareness Section 2 details high level program objectives. All facilities are included in the program.**
89. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162 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 **88980 (72)**  
Result Notes **This is in the Public Awareness Manual in Section 4.**
90. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 195.440(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 **88980 (72)**  
Result Notes **This is in the Public Awareness Manual in Section 1.**
91. Question Result, ID, References **Sat, PD.PA.PROGRAM.P, 195.440(a) (195.440(h))**  
Question Text *Has the continuing public education (awareness) program been established as required?*  
Assets Covered **88980 (72)**  
Result Notes **This is in the Public Awareness Manual and the program is referenced in the Administrative manual.**
92. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 195.440(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 hazardous liquid or carbon dioxide is transported?*  
Assets Covered **88980 (72)**  
Result Notes **This is in the Public Awareness Manual in Section 4.**
93. Question Result, ID, References **Sat, PD.PA.SUPPLEMENTAL.P, 195.440(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 along all pipeline systems, as described in API RP 1162?*  
Assets Covered **88980 (72)**  
Result Notes **This is in the Public Awareness Manual in Section 10.**
94. Question Result, ID, References **Sat, PD.PA.LANGUAGE.P, 195.440(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 **88980 (72)**  
Result Notes **This is in the Public Awareness Manual in Section 10. The brochures are available.**
95. Question Result, ID, References **Sat, PD.PA.EVALPLAN.P, 195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E)**  
Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*  
Assets Covered **88980 (72)**  
Result Notes **This is in the Public Awareness Manual in Section 7A and 7B.**

## RPT.RR: Regulatory Reporting (Traditional)

96. Question Result, ID, References **NA, RPT.RR.GRAVITY.P, 195.13(a) (195.13(b), 195.13(c))**  
Question Text *Does the process comply with the reporting requirements in Subpart B relating to gravity lines?*  
Assets Covered **88980 (72)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
97. Question Result, ID, References **NA, RPT.RR.REGONLYGATHER.P, 195.15(a) (195.15(b), 195.15(c))**  
Question Text *Does the process comply with the reporting requirements in Subpart B relating to regulated-only gathering lines?*  
Assets Covered **88980 (72)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
98. Question Result, ID, References **Sat, RPT.RR.ACCIDENTREPORT.P, 195.54(a) (195.50(a), 195.50(b), 195.50(c), 195.50(d), 195.50(e), 195.13(b), 195.15(b))**  
Question Text *Does the process require preparation and filing of an accident report as soon as practicable but no later than 30 days after discovery of a reportable accident?*  
Assets Covered **88980 (72)**  
Result Notes **This process is contained in the Administrative Manual D-1 in Section 2.**
99. Question Result, ID, References **Sat, RPT.RR.ACCIDENTREPORTSUPP.P, 195.402(a) (195.402(c)(2), 195.54(b), 195.13(b), 195.15(b))**  
Question Text *Does the process require preparation and filing of supplemental accident reports?*  
Assets Covered **88980 (72)**  
Result Notes **This process is contained in the Administrative Manual D-1 in Section 3.2.**
100. Question Result, ID, References **Sat, RPT.RR.IMMEDREPORT.P, 195.402(a) (195.402(c)(2), 195.52(b), 195.52(c), 195.52(d))**  
Question Text *Are procedures in place to immediately report accidents to the National Response Center?*  
Assets Covered **88980 (72)**  
Result Notes **This process is contained in the Administrative Manual D-1 in Section 4.2.**
101. Question Result, ID, References **Sat, RPT.RR.SRCR.P, 195.402(a) (195.55(a), 195.55(b), 195.56(a), 195.56(b), 195.13(b), 195.15(b))**  
Question Text *Are processes in place to file safety-related condition reports if the conditions of 195.55 are met?*  
Assets Covered **88980 (72)**  
Result Notes **This process is contained in the Administrative Manual D-1 in Section 7 and the Maintenance Manual in E-13.**
102. Question Result, ID, References **Sat, RPT.RR.OPID.P, 195.64(a) (195.64(c), 195.64(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 **88980 (72)**  
Result Notes **MPL has received an OPID already.**
103. Question Result, ID, References **Sat, RPT.RR.CONSTRUCTIONREPORT.P,**  
Question Text *Is there a process to report all construction of new pipelines intended to operate at 20% SMYS or greater at least 45 days prior to construction?*  
Assets Covered **88980 (72)**  
Result Notes **This process is contained in the Administrative Manual D-1 in Section 8.1.**
104. 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 **88980 (72)**  
Result Notes **This process is contained in the Administrative Manual D-1 in Section 10.**



## TD.ATM: Atmospheric Corrosion

105. Question Result, ID, References **Sat, TD.ATM.ATMCORRODECOAT.P, 195.402(c)(3) (195.581(a), 195.581(b), 195.581(c))**  
Question Text *Does the process give adequate instruction for the protection of pipeline against atmospheric corrosion?*  
Assets Covered **88980 (72)**  
Result Notes **This process is in the Maintenance Manual E-8 in Section 1.6.**
106. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINS.P, 195.402(c)(3) (195.583(a), 195.583(b), 195.583(c))**  
Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments exposed to the atmosphere?*  
Assets Covered **88980 (72)**  
Result Notes **This process is in the Administrative Manual D-3 in Section 2.3.**

## TD.CP: External Corrosion - Cathodic Protection

107. Question Result, ID, References **Sat, TD.CP.MAPRECORD.P, 195.589(a) (195.589(b))** (also presented in: TD.CPMONITOR)  
Question Text *Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?*  
Assets Covered **88980 (72)**  
Result Notes **This is in the Maintenance Manual D6 in Section 6 - It states the company will maintain records and maps.**
108. Question Result, ID, References **Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e))** (also presented in: TD.CPMONITOR, TD.CPEXPOSED)  
Question Text *Does the process require correction of any identified deficiencies in corrosion control?*  
Assets Covered **88980 (72)**  
Result Notes **Maintenance Manual D6 Section 6 - Part 2.4**
109. Question Result, ID, References **Sat, TD.CP.NEWOPERATE.P, 195.402(c)(3) (195.563(a), 195.563(c), 195.563(d))**  
Question Text *Does the process specify when cathodic protection must be operational on constructed, relocated, replaced, or otherwise changed pipelines?*  
Assets Covered **88980 (72)**  
Result Notes **This is in the Maintenance Manual D6 in Section 1**
110. Question Result, ID, References **Sat, TD.CP.UNPROTECT.P, 195.402(c)(3) (195.563(e), 195.573(b)(1), 195.573(b)(2))**  
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 **88980 (72)**  
Result Notes **The Maintenance Manual E-8 in Section 1 discusses coating.**
111. Question Result, ID, References **Sat, TD.CP.ISOLATE.P, 195.402(c)(3) (195.575(a), 195.575(b), 195.575(d))**  
Question Text *Does the process provide 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 **88980 (72)**  
Result Notes **The Maintenance Manual D-6 in Section 1.8 is where isolation is discussed.**

## TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

112. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEADINSTALL.P, 195.402(c) (195.567(b))**  
Question Text *Does the process provide adequate instructions for the installation of test leads?*  
Assets Covered **88980 (72)**  
Result Notes **This is discussed in the Maintenance Manual D6 in Section 2.5-2.6.**

113. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEADMANT.P, 195.402(c)(3) (195.567(c))**  
 Question Text *Does the process require that test lead wires must be properly maintained?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual D6 in Section 1.3.**
114. Question Result, ID, References **Sat, TD.CPMONITOR.MONITORCRITERIA.P, 195.402(c)(3) (195.571)**  
 Question Text *Does the process require that CP monitoring criteria be used that is acceptable?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual D6 in Section 2.1.**
115. Question Result, ID, References **Sat, TD.CPMONITOR.TEST.P, 195.402(c)(3) (195.573(a)(1))**  
 Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual D6 in Section 2.1.**
116. Question Result, ID, References **Sat, TD.CPMONITOR.CIS.P, 195.402(c)(3) (195.573(a)(2))**  
 Question Text *Does the process adequately describe the circumstances in which a CIS or comparable technology is practicable and necessary no more than 2 years after a cathodic protection system has been installed?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual D6 in Section 1.6.**
117. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.P, 195.402(c)(3) (195.573(c))**  
 Question Text *Does the process give sufficient details for making electrical checks of rectifiers, interference bonds, diodes, and reverse current switches?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual D6 in Section 1.7.**
118. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENT.P, 195.402(c)(3) (195.577(a), 195.577(b))**  
 Question Text *Does the operator have a process in place to minimize detrimental effects of interference currents on its pipeline system and do the procedures for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual D6 in Section 3.7.**

## **TD.COAT: External Corrosion - Coatings**

119. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.P, 195.402(c)(3) (195.557(a), 195.559, 195.401(c))**  
 Question Text *Does the process require coatings for pipelines constructed, relocated, replaced, or otherwise changed after the applicable date in 195.401(c) to meet the requirements of 195.559?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual E8 in Section 1.1.**
120. Question Result, ID, References **Sat, TD.COAT.NEWPIPEINSPECT.P, 195.402(c)(3) (195.561(a), 195.561(b))**  
 Question Text *Does the process require that the coating be inspected on new pipelines just prior to it being lowered into the pipe trench?*  
 Assets Covered **88980 (72)**  
 Result Notes **This is discussed in the Maintenance Manual E8 in Section 9.**

## **TD.CPEXPOSED: External Corrosion - Exposed Pipe**

121. Question Result, ID, References **Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 195.402(c)(3) (195.569)**

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 required to determine the extent of the corrosion?*

Assets Covered 88980 (72)

Result Notes This is discussed in the Maintenance Manual G1 in Section 1.1.

122. Question Result, ID, References Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 195.402(c)(3) (195.587)

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

Assets Covered 88980 (72)

Result Notes This is discussed in the Maintenance Manual E-2 in Section 10.

123. Question Result, ID, References Sat, TD.CPEXPOSED.EXTCORRODEREPAIR.P, 195.402(c)(3) (195.585(a), 195.585(b))

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 88980 (72)

Result Notes This is discussed in the Maintenance Manual E-2 in Section 6.

## TD.ICP: Internal Corrosion - Preventive Measures

124. Question Result, ID, References Sat, TD.ICP.INVESTREMED.P, 195.402(c)(3) (195.579(a))

Question Text *Does the process give adequate guidance for investigating and mitigating the corrosive effects of hazardous liquids or carbon dioxide being transported?*

Assets Covered 88980 (72)

Result Notes This is discussed in the Maintenance Manual D-6 in Section 1.4.

125. Question Result, ID, References Sat, TD.ICP.INHIBITOR.P, 195.402(c)(3) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text *Does the process give adequate direction for the utilization of corrosion inhibitors?*

Assets Covered 88980 (72)

Result Notes Maintenance D-6 Section 1.4

126. Question Result, ID, References Sat, TD.ICP.EXAMINE.P, 195.402(c)(3) (195.579(a), 195.579(c))

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

Assets Covered 88980 (72)

Result Notes Maintenance G-1 Section 3.2

127. Question Result, ID, References Sat, TD.ICP.EVALUATE.P, 195.402(c)(3) (195.587)

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

Assets Covered 88980 (72)

Result Notes Maintenance D-6 Section E-2

## TQ.QU: Qualification of Personnel - Specific Requirements

128. Question Result, ID, References Sat, TQ.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h)) (also presented in: TD.CP)

Question Text *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*

Assets Covered 88980 (72)

Result Notes Maintenance Manual D6 Section 6 - 1.5

## TQ.TRERP: Training of Personnel - Emergency Response

129. Question Result, ID, References **Sat, TQ.TRERP.ERCONDITIONS.P, 195.403(a)(3)**  
 Question Text *Are conditions that are likely to cause emergencies, their consequences, and appropriate corrective action identified in the ER training?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual B-1 4.3**
130. Question Result, ID, References **Sat, TQ.TRERP.ERFIREPROT.P, 195.403(a)(5)**  
 Question Text *Are the potential causes, types, sizes, and consequences of fire and appropriate use of portable fire extinguishers and other on-site fire control equipment covered in the ER training?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual B-1 4.3.3**
131. Question Result, ID, References **Sat, TQ.TRERP.ERHAZTRAINING.P, 195.403(a)(2)**  
 Question Text *Are the characteristics and hazards of the hazardous liquids or carbon dioxide transported covered in the ER training?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual B-1 4.3.2.**
132. Question Result, ID, References **Sat, TQ.TRERP.ERRELEASECONTROL.P, 195.403(a)(4)**  
 Question Text *Are the steps necessary to control any accidental release of hazardous liquid to minimize the potential for fire, explosion, toxicity, or environmental damage identified in the ER training?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual B-1 4.3.2**
133. Question Result, ID, References **Sat, TQ.TRERP.ERTRAINING.P, 195.403(a)(1)**  
 Question Text *Does emergency response training cover the emergency procedures established under 195.402?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual B-1 4.3**
134. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGREVIEW.P, 195.403(b)**  
 Question Text *Does the process require review of emergency response personnel performance at the required frequency?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual B-1 4.3.2 Annual Spill Drills are performed.**
135. Question Result, ID, References **Sat, TQ.TRERP.ERTRAININGSUPERVISE.P, 195.403(c)**  
 Question Text *Does the process require supervisors be trained on emergency response procedures for which they are responsible?*  
 Assets Covered **88980 (72)**  
 Result Notes **Admin Manual B-1 4.3.2**

### **TDC.TKPIPING: New Tank Piping - Construction**

136. Question Result, ID, References **Sat, DC.DN.DESIGNPRESS.P, 195.106(a) (195.106(b), 195.106(c), 195.106(d), 195.106(e))** (also presented in: DC.DN)  
 Question Text *Does the process require the internal design pressure of the pipeline (or pipe) be determined in accordance with 195.106?*  
 Assets Covered **88980 (72)**  
 Result Notes **This process is in the Maintenance Manual G-3 Section 4.1.**

### **TDC.WELDPROCEDURE: New Tank Piping - Construction Welding Procedures (Re-Presented)**

137. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELDPROCEDURE.P, 195.214(b)** (also presented in: DC.WELDPROCEDURE)  
 Question Text *Are welding procedures and qualifying tests required to be recorded in detail?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 1.3 contains this process.**
138. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELD.P, 195.214(a)** (also presented in: DC.WELDPROCEDURE)  
 Question Text *Does the process require welding to be performed by qualified welders using qualified welding procedures?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 1 contains this process.**
139. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELDINSERVICE.P, 195.402(a) (195.422(a),)** (also presented in: DC.WELDPROCEDURE)  
 Question Text *Does the process require consideration of issues related to welding on in-service pipelines?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 5 contains this process.**
140. Question Result, ID, References **Sat, DC.WELDPROCEDURE.ARCBURNRNDWIRE.P, 195.202 (195.226(a), 195.226(b), 195.226(c))** (also presented in: DC.WELDPROCEDURE)  
 Question Text *Does the process address arc burns and ground wires in accordance with 195.226?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 2.2 contains this process.**

### **TDC.WELDERQUAL: New Tank Piping - Construction Welder Qualification (Re-Presented)**

141. Question Result, ID, References **Sat, DC.WELDERQUAL.WELDERQUAL.P, 195.222(a) (195.222(b))** (also presented in: DC.WELDERQUAL)  
 Question Text *Is each welder required to be qualified in accordance with section 6 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 1 contains this process.**

### **TDC.WELDINSPECTION: New Tank Piping - Construction Weld Inspection (Re-Presented)**

142. Question Result, ID, References **Sat, DC.WELDINSPECTION.WELDINSPECT.P, 195.228(a) (195.228(b))** (also presented in: DC.WELDINSPECTION)  
 Question Text *Are welds required to be inspected to ensure compliance with the requirements of 195.228?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 7 contains this.**
143. Question Result, ID, References **Sat, DC.WELDINSPECTION.WELDREPAIR.P, 195.202 (195.230(a), 195.230(b), 195.230(c))** (also presented in: DC.WELDINSPECTION)  
 Question Text *Are welds that are unacceptable required to be removed and/or repaired as specified by 195.230 and are repair procedures in place?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 7 contains this process.**
144. Question Result, ID, References **Sat, DC.WELDINSPECTION.WELDNDT.P, 195.234(a) (195.234(b), 195.234(c))** (also presented in: DC.WELDINSPECTION)  
 Question Text *Are there processes for nondestructive testing and for determining standards of acceptability?*  
 Assets Covered **88980 (72)**  
 Result Notes **The Maintenance Manual B-3 Section 7.5 contains this process.**
145. Question Result, ID, References **Sat, DC.WELDINSPECTION.WELDNDTQUAL.P, 195.202 (195.234(b)(2))** (also presented in: DC.WELDINSPECTION)  
 Question Text *Does the process require nondestructive testing of welds (for maintenance and construction) be performed by personnel who are trained in procedures established to ensure compliance with 195.228 and in use of the testing equipment?*

Assets Covered 88980 (72)

Result Notes The Maintenance Manual B-3 Section 7.4 and 7.5.4 contains this process.

146. Question Result, ID, References Sat, DC.WELDINSP.GIRTHWELDNDT.P, 195.202 (195.234(d), 195.234(e), 195.234(f), 195.234(g), 195.266) (also presented in: DC.WELDINSP)
- Question Text *Does the process require certain girth welds to be nondestructively tested in accordance with 195.234(d), (e), (f), and (g)?*
- Assets Covered 88980 (72)
- Result Notes The Maintenance Manual B-3 Section 7.2.2 contains this process for repaired portions at 100%. All new girth welds will be tested at 100%

## FS.PS: Pump Stations

147. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.P, 195.402(c)(3) (195.428(a)) (also presented in: MO.LMOPP)
- Question Text *Does the process adequately detail the inspecting and testing of each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment?*
- Assets Covered 88980 (72)
- Result Notes The Maintenance Manual D-5 discusses pressure limiting and relief devices. Veco also performed a study on the pump curve and surge pressure.
148. Question Result, ID, References Sat, MO.LMOPP.LAUNCHRECVRELIEF.P, 195.402(c)(3) (195.426) (also presented in: MO.LMOPP)
- Question Text *Does the process include requirements for relief devices and their proper use for launchers and receivers?*
- Assets Covered 88980 (72)
- Result Notes The Maintenance Manual D-16. in Section 1.3 contains this process.

## FS.VA: Valves

149. Question Result, ID, References Sat, MO.LM.VALVEMAIN.T.P, 195.402(c)(3) (195.420(a)) (also presented in: MO.LM)
- Question Text *Does the process adequately address the maintenance program for each valve that is necessary for safe operation of the pipeline system?*
- Assets Covered 88980 (72)
- Result Notes Maint manual D-3 Section 1 Section 2 Valve Inspection
150. Question Result, ID, References Sat, MO.LM.VALVEMAIN.TBIANN.P, 195.402(c)(3) (195.420(b)) (also presented in: MO.LM)
- Question Text *Does the process address inspecting each mainline valve?*
- Assets Covered 88980 (72)
- Result Notes Maint manual D-3 Section 1 Section 2 Valve Inspection
151. Question Result, ID, References Sat, MO.LM.VALVEPROTECT.P, 195.402(c)(3) (195.420(c)) (also presented in: MO.LM)
- Question Text *Does the process contain criteria for providing protection for each valve from unauthorized operation and from vandalism?*
- Assets Covered 88980 (72)
- Result Notes Maint manual D-3 Section 2.5 2.6

## PD.RW: ROW Markers, Patrols, Monitoring

152. Question Result, ID, References Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: MO.RW)
- Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*
- Assets Covered 88980 (72)
- Result Notes In Maintenance Manual D-2 Section 1.
153. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 1162, Section 8) (also presented in: MO.RW)



Question Text *Does the process address how line markers are to be placed and maintained?*  
Assets Covered 88980 (72)  
Result Notes In the Maintenance Manual D-2 (Section 4). Specifically, 4.1 has the required locations.

## PD.SN: Facilities Signage and Security

154. Question Result, ID, References Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: FS.FG)  
Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*  
Assets Covered 88980 (72)  
Result Notes This is discussed in the Maintenance Manual D-10 in Section 2.7.
155. Question Result, ID, References Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: FS.FG)  
Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*  
Assets Covered 88980 (72)  
Result Notes This is discussed in the Maintenance Manual D-10 in Section 4.
156. Question Result, ID, References NA, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: FS.FG)  
Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*  
Assets Covered 88980 (72)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Maint Manual D-2 Section 4 discusses line markers however.

## TD.CP: External Corrosion - Cathodic Protection

157. Question Result, ID, References Sat, TQ.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h)) (also presented in: TQ.QU)  
Question Text *Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?*  
Assets Covered 88980 (72)  
Result Notes Maintenance Manual D6 Section 6 - 1.5

## TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

158. Question Result, ID, References Sat, TD.CP.MAPRECORD.P, 195.589(a) (195.589(b)) (also presented in: TD.CP)  
Question Text *Does the process require maps and/or records of cathodic protection systems that have been installed on pipelines constructed, relocated, replaced, converted to hazardous liquid service, or otherwise changed?*  
Assets Covered 88980 (72)  
Result Notes This is in the Maintenance Manual D6 in Section 6 - It states the company will maintain records and maps.
159. Question Result, ID, References Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED)  
Question Text *Does the process require correction of any identified deficiencies in corrosion control?*  
Assets Covered 88980 (72)  
Result Notes Maintenance Manual D6 Section 6 - Part 2.4

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

160. Question Result, ID, References Sat, TD.CP.DEFICIENCY.P, 195.402(c)(3) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR)  
Question Text *Does the process require correction of any identified deficiencies in corrosion control?*  
Assets Covered 88980 (72)  
Result Notes Maintenance Manual D6 Section 6 - Part 2.4



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.

# G1: Intrastate HL O&M 8602

UTC O&M/Procedures Inspection Report  
Intrastate Hazardous Liquids  
FORM G1: State-Specific Requirements

**\*\* THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE LIQUIDS OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE PROCEDURES" MODULE IN THE MOST CURRENT IA HAZARDOUS LIQUID QUESTION SET**

## Inspector and Operator Information

Inspection ID	Inspection Link	Inspector - Lead	Inspector - Assist
8602	8602	Cullom, David	Hoxit, Jason
Operator	Unit	Records Location - City & State	
McChord US Oil and Refining	McChord US Oil and Refining	Tacoma, Wa.	
Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date	
09-26-2023	10-19-2023		

You must include the following in your inspection summary:

- \* Inspection Scope
- \* Facilities visited and Total AFOD
- \* Summary of Significant Findings

### Inspection Scope

This inspection was a review of the Operations and Maintenance Manual(s) and included a plan and procedures review.

### Summary of the system

LF Pre-70 ERW mileage is at 13.25. The remaining 1 mile is not LF Pre-70 ERW. The McChord Pipeline is a buried intrastate pipeline 14.25 miles in length, constructed in 1966 with 6-inch nominal steel pipe grade B, wall thickness of 0.188 inch to 0.432 inch. A one mile reroute was performed in 1996. The pipeline has a 720 psig MOP (36% SMYS) with a normal operating pressure at 450 psig (21% SMYS). The pipeline is divided into four sections with isolation valves between each section. The entire pipeline has about 400 foot elevation differential. The pipeline transports jet fuel from US Oil Refinery located in Tacoma near Commencement Bay to the McChord Air Base storage facility. Jurisdiction begins at the pump suction valves (P-1401) and ends at the custody transfer manifold valves downstream of the meters at McChord Air Force Base. The pipeline was hydrostatically tested in 1996, inline inspected in 2004 (GE pig), and MFL runs were completed in 2009, 2014 and 2019. Prior to each run they evaluate the tool to make sure complementary technologies are used. Tuboscope was used in 1996. GE used UT in 2004. In 2005, there was a pressure cycle analysis done by Kiefner and Assoc. along with the LF Pre-70 ERW study. In 2009, a MFL pig was run by Baker Hughes. Threats, such as seam integrity due to low frequency pre-1970 ERW pipe and also third party damage, were discussed and documentation reviewed. Keifner and Associates also performed a study on the seam threat and ruled it out as a major threat to the system's safe operation. In regards to the third party damage threat, the August 2, 2017 incident (Sefnco) was discussed along with the prompt detection of the leak by the CPM. The quick shutdown and response time by the operator were also discussed in this inspection. The line is due for another ILLI run in 2024. BOT/RTs were included per request in the inspection plan, but this system has no jurisdictional break out tanks. McChord's integrity management program considers all of its pipeline to be in a HCA or a HCA CA given its location and proximity to HPAs, CNWs, ecological and drinking water USAs.

### Facilities visited and Total AFOD

Facilities were not visited for the Operations and Maintenance (O&M) plan and procedure inspection. This inspection was 3 AFODs.

### Summary of Significant Findings

There were no Areas of Concern or Probable Violations noted during this inspection.

Primary Operator contacts and/or participants

Joel Roppo (253) [383-1651jroppo@parpacific.com](mailto:383-1651jroppo@parpacific.com) Par Pacific Chief Engineer

John Williamson (253) [383-1651jwilliamson@parpacific.com](mailto:383-1651jwilliamson@parpacific.com) Par Pacific Senior Inspector

Group LI, or Group TD, AR, IM and/or Directive--HL IM, HL IM Implementation, BO Tank Inspection were selected per the inspection crosswalk.

## Instructions and Ratings Definitions

### INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

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

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

### INSPECTION RESULTS

Satisfactory Responses

Unsatisfactory Responses

Area of Concern Responses

Not Applicable Responses

Not Checked / Evaluated Responses

Satisfactory List

Unsatisfactory List

Area of Concern List

Not Applicable List

Not Checked / Evaluated List

Unanswered Questions

Unanswered Questions List

**\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the "PROCEDURES: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.**

## INTRASTATE LIQUIDS OPERATOR PROCEDURES

### MAPPING PROCEDURES

#### Question 1

Do procedures require that NPMS submissions are updated every 12 months if system modifications occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

#### Q1 Reference

PHMSA ADB 08-07

#### Q1 Notes

Admin Manual D-1 Section 9 9.19.2

#### Q1 Result

Satisfactory

## REPORTING PROCEDURES

#### Question 2

Do procedures require that the operator file with the commission, not later than June 15 of each year, applicable to the preceding calendar year: a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7000.1-1 annual report required by U.S. DOT, Office of Pipeline Safety? Do the procedures require a report titled, "Hazardous Liquid Annual Report Form" which can be obtained from the Pipeline Safety Section of the commission? Do the procedures specify the process in sufficient detail to ensure compliance with content requirements in WAC 480-75-650(2)?

**Q8 Reference**  
WAC 480-75-650(2)

**Q2 Result**  
Satisfactory

**Q2 Notes**  
Admin Manual D-1 Section 6

## DAMAGE PREVENTION PROCEDURES

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### Question 3

Does the operator have sufficiently detailed directional drilling/boring procedures that include taking actions necessary to protect their facilities from dangers posed by drilling/boring or other trenchless technologies?

**Q11 Reference**  
PHMSA State Programs Emphasis

**Q3 Result**  
Satisfactory

**Q3 Notes**  
Admin Manual J-6 Sect Pg 2.6.4

### Question 4

Do procedures include the use of a quality assurance program for monitoring the locating and marking of facilities? Does the procedure require regular field audits of the performance of locators/contractors and implementing appropriate corrective action when necessary? Do procedures include a process to address performance problems through mechanisms such as re-training, process change, or changes in staffing levels?

**Q4 Reference**  
PHMSA State Program Question

**Q4 Result**  
Satisfactory

**Q4 Notes**  
Admin Manual J-6 Sect Pg 2.6.3

### Question 5

Do procedures outline a process by which the operator can terminate the flow of hazardous liquid immediately upon receiving information of third party damage? Do the procedures require visual inspection of pipelines involved in an excavation damage and determines whether the damaged line should be replaced or repaired, or whether it is safe to resume pipeline operation?

**Q5 Reference**  
RCW 19.122.035

**Q5 Result**  
Satisfactory

**Q5 Notes**  
Maint manual E-2 (repairs) and E-9 leaking pipe/ leak repair.

### Question 6

Does the operator have sufficiently detailed procedures that require immediate notification of local first responders and the Department of Ecology for any reportable release of a hazardous liquid from a pipeline? Do the procedures require taking all appropriate steps to ensure public safety in the event of a release of hazardous liquid?

**Q6 Reference**  
RCW 19.122.035(3)

**Q6 Result**  
Satisfactory

**Q6 Notes**  
Admin Manual C-2 Sect Pg 1-2, USOR Emergency Response Plan referenced Pg (3.1.-3)

### Question 7

Does the operator have a sufficiently detailed procedure to review records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

**Q7 Reference**  
PHMSA State Programs Emphasis

**Q7 Result**  
Satisfactory

**Q7 Notes**  
Under the public awareness program Section 8 contains continuous improvement for excavation damages. Any accident is investigated using the FIR (Field Investigation Report). IMP Checklist Appendix D-1

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## DESIGN/CONSTRUCTION PROCEDURES

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## CORROSION CONTROL PROCEDURES

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## OPERATIONS & MAINTENANCE PROCEDURES

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### Question 8

Does the operator's procedure require scheduling of rights-of-way inspections at least once each calendar week in accordance with the requirements in WAC 480-75-530?

#### Q8 Reference

WAC 480-75-530

#### Q8 Result

Satisfactory

#### Q8 Notes

Maintenance Manual D-1 Exhibit A Table

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## PROCEDURES: SUMMARY OF REQUIRED COMMENTS

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**PROCEDURE REVIEW SUMMARY:** Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

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## ADDITIONAL HEADER TEMPLATE

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Comments Template for additional comment boxes

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