

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	8600 - McChord - LIMP	Operator(s)	MCCHORD PIPELINE CO. (31049)	Plan Submitted	01/19/2023
		Lead	David Cullom	Plan Approval	01/19/2023 by Dennis Ritter
Status	LOCKED	Observer(s)	Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Tom Green, Jason Hoxit	All Activity Start	10/17/2023
Start Year	2023	Supervisor	Dennis Ritter	All Activity End	10/19/2023
System Type	HL	Director	Scott Rukke	Inspection Submitted	11/01/2023
Protocol Set ID	WA.HL.2022.02			Inspection Approval	11/01/2023 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

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.

Annual Reports reviewed for 2021 and 2022. 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.

Facilities visited and Total AFOD

Facilities were not visited for the Integrity Management Program Inspection with the exception of one observation/field question that required visual confirmation of fire fighting equipment. 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 Par Pacific Chief Engineer

John Williamson (253) 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.

Form G1 also completed in QB.

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1. 88980 (72)	McChord Pipeline Company	unit	88980	Offshore GOM HVL CO2 Biofuels Reg Rural Gather Rural Low Stress	200	200	200	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)	HL IM Implementation, BO Tank Inspection, HL IM	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, 114, GENERIC	P, R, O, S	Detail --

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s))	Planned	Required	Total Inspected	Required % Complete
1	Records and Field	--	10/17/2023 10/19/2023	--	all planned questions	all assets	all types	200	200	200	100.0%
2	Records and Field	--	10/17/2023 10/19/2023	--	all planned questions	all assets	all types	200	200	200	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Records and Field	COMPLETED	11/01/2023	Records and Field	--

Results (all values, 200 results)

219 (instead of 200) results are listed due to re-presentation of questions in more than one sub-group.

AR.EC: External Corrosion Direct Assessment (ECDA)

1. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.O, 195.505 (195.452(b)(5), 195.452(f)(8), 195.555)**
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
Assets Covered **88980 (72)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
2. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.P, 195.505 (195.452(f)(8), 195.555)**
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
3. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.R, 195.507 (195.452(l)(1), 195.555)**
Question Text *Do the records indicate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
4. Question Result, ID, References **NA, AR.EC.ECDAPLAN.P, 195.588(b)(1) (195.588(b)(2) - (5), 195.452(f)(5), 195.452(j)(5)(iii))**
Question Text *Is there a process in place for conducting ECDA?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
5. Question Result, ID, References **NA, AR.EC.ECDAPREASSESS.R, 195.589(c) (195.588(b)(2), 195.452(l)(1)(ii), 195.452(j)(5)(iii), 195.452(f)(5))**
Question Text *Do the records indicate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3?*
Assets Covered **88980 (72)**
Result Notes **No such activity/condition was observed during the inspection.**
6. Question Result, ID, References **NA, AR.EC.ECDAINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.588(b))**
Question Text *Does the process include integrating ECDA results with other information?*
Assets Covered **88980 (72)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
7. Question Result, ID, References **NA, AR.EC.ECDAINTEGRATION.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.588(b))**
Question Text *Do the records indicate that the operator integrated other data/information when evaluating data/results?*
Assets Covered **88980 (72)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
8. Question Result, ID, References **NA, AR.EC.ECDAREGION.R, 195.589(c) (195.588(b)(2)(ii), 195.588(b)(3), 195.588(b)(5)(ii), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii), 195.588(b)(1))**
Question Text *Do the records indicate that the operator identified ECDA Regions?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
9. Question Result, ID, References **NA, AR.EC.ECDAINDIRECT.R, 195.589(c) (195.588(b)(3), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))**
Question Text *Do the records indicate that the ECDA indirect inspection process complied with NACE SP0502-2010?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

10. Question Result, ID, **NA, AR.EC.ECDADIRECT.R, 195.589(c) (195.588(b)(4), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii))**
 References
 Question Text *Do the records indicate that excavations, direct examinations, and data collection were performed in accordance with NACE SP0502-2010, Section 5?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
11. Question Result, ID, **NA, AR.EC.ECDADIRECT.O, 195.588(b)(4) (195.588(b)(1), 195.452(b)(5), 195.452(f)(5),)**
 References
 Question Text *Were ECDA direct examinations conducted in accordance with the plan?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
12. Question Result, ID, **NA, AR.EC.ECDAANALYSIS.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(j)(5)(iii))**
 References
 Question Text *Do the records indicate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
13. Question Result, ID, **NA, AR.EC.ECDAPLANMOC.P, 195.588(b)(4)(iii) (195.452(f)(4))**
 References
 Question Text *Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
14. Question Result, ID, **NA, AR.EC.ECDAPLANMOC.R, 195.589(c) (195.588(b)(4)(iii), 195.452(l)(1)(ii), 195.452(f)(4))**
 References
 Question Text *Do the records indicate that changes in the ECDA plan have been implemented and documented?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
15. Question Result, ID, **NA, AR.EC.ECDAPOSTASSESS.R, 195.589(c) (195.588(b)(5), 195.452(l)(1)(ii), 195.452(f)(4))**
 References
 Question Text *Do the records indicate that the requirements for post assessment were implemented?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.SCC: Stress Corrosion Cracking Direct Assessment (SCCDA)

16. Question Result, ID, **NA, AR.SCC.SCCDAALL.O, 195.588(c) (195.505)**
 References
 Question Text *From field observations, was SCCDA performed in accordance with the SCCDA plan?*
 Assets Covered **88980 (72)**
 Result Notes **No such activity/condition was observed during the inspection.**

AR.IA: Integrity Assessments

17. Question Result, ID, **Sat, AR.IA.METHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)**
 References
 Question Text *Does the process specify assessment methods that are appropriate for the pipeline integrity threats?*
 Assets Covered **88980 (72)**
 Result Notes **IMP Manual Rev 19 2020. Section 5.3. The assessment methods of pressure testing and ILI used.**
18. Question Result, ID, **Sat, AR.IA.METHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588)**
 References
 Question Text *Do the records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats?*
 Assets Covered **88980 (72)**

Result Notes Section 5.3 discusses not using pressure testing as an assessment method due to now having ILI data from 2009, 2014, and 2019. 2024 is the next run.

19. Question Result, ID, Sat, AR.IA.ASSESSSCHEDULE.P, 195.452(f)(5) (195.452(j)(3), 195.452(j)(5), 195.452(e), 195.452(g),
References 195.591, 195.452(d)(1), 195.452(n))
Question Text *Does the process for assessment include a prioritized schedule in accordance with 195.452(d) for baseline assessments and 195.452 (j) for continual assessments that is based on all the risk factors required by 195.452(e)?*
Assets Covered 88980 (72)
Result Notes Section 8.1 Integrity Assessment Interval (NTE 5 years)
20. Question Result, ID, Sat, AR.IA.ASSESSSCHEDULE.R, 195.452(l)(1)(ii) (195.452(b)(5), 195.452(c), 195.452(d),
References 195.452(f)(5), 195.452(j)(3), 195.452(j)(5), 195.591)
Question Text *Do the records indicate that assessments are implemented as specified in the assessment plan?*
Assets Covered 88980 (72)
Result Notes 12/15/2004 UT/Caliper, 8/19/2009 MFL, 10/30/2014 MFL, 6/20/2019 MFL. ILI assessment due in 2024.
21. Question Result, ID, Sat, AR.IA.REVIEWQUAL.P, 195.452(f)(8) (195.452(g), 195.452(h)(2))
References
Question Text *Does the process specify qualification requirements for personnel who review and evaluate integrity assessment results and information analysis?*
Assets Covered 88980 (72)
Result Notes IMP Section 6.3 Qualifications of Contractor and Vendor Specifications.
22. Question Result, ID, Sat, AR.IA.REVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g), 195.452(h)(2))
References
Question Text *Do the records indicate that personnel who review and evaluate integrity assessment results and information analysis are qualified?*
Assets Covered 88980 (72)
Result Notes 3 analysts were employed for the review of the 2019 data from Level 1 to Level 3.
23. Question Result, ID, Sat, AR.IA.STANDARDS.P, 195.452(f)(5) (195.452(b)(6))
References
Question Text *Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing integrity assessments?*
Assets Covered 88980 (72)
Result Notes The operator's contracted vendor uses industry certifications, methods, and best practices.
24. Question Result, ID, Sat, AR.IA.STANDARDS.R, 195.452(l)(1)(ii) (195.452(b)(6))
References
Question Text *Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments?*
Assets Covered 88980 (72)
Result Notes Onstream ILI report for run done 6/20/2019. Modified B31G used and 1" x 6t

AR.IL: In-Line Inspection (Smart Pigs)

25. Question Result, ID, Sat, AR.IL.ILIIMPLPERQUAL.P, 195.452(f)(5) (195.591)
References
Question Text *Does the process identify the qualification requirements for personnel who perform ILI (In Line Inspections)?*
Assets Covered 88980 (72)
Result Notes IMP Section 6.3. Qualification of Contractors and Vendor Specifications.
26. Question Result, ID, Sat, AR.IL.ILIIMPLPERQUAL.R, 195.591 (195.452(l)(1)(ii), 195.452(f)(5))
References
Question Text *Do the records indicate that personnel who perform ILI (In Line Inspections) are qualified and certified (where applicable)?*
Assets Covered 88980 (72)
Result Notes ILI Field Tech Level 1 - Exp 11/2/2019 for pig run 6/2019

27. Question Result, ID, References **Sat, AR.IL.ILIREVIEWQUAL.P, 195.452(f)(8) (195.452(g))**
 Question Text *Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis?*
 Assets Covered **88980 (72)**
 Result Notes **IMP manual section 6.3 contains this.**
28. Question Result, ID, References **Sat, AR.IL.ILIREVIEWQUAL.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(g))**
 Question Text *Do the records indicate that personnel who review and evaluate ILI integrity assessment results and information analysis are qualified?*
 Assets Covered **88980 (72)**
 Result Notes **Level 2 and Level 3 reviewed ILI run data results. Roni Sierra exp 4/1/2022 for the run on 6/20/2019**
29. Question Result, ID, References **Sat, AR.IL.ILISPECS.P, 195.452(f)(5) (195.452(h), 195.452(j), 195.591)**
 Question Text *Does the process include adequate ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization?*
 Assets Covered **88980 (72)**
 Result Notes **This is in the IMP Manual (Section 6.3)**
30. Question Result, ID, References **Sat, AR.IL.ILIVALIDATE.P, 195.452(f)(4) (195.452(j)(5)(i), 195.452(h), 195.591)**
 Question Text *Does the process include the validation of ILI results?*
 Assets Covered **88980 (72)**
 Result Notes **IMP Section 6.5 (Validation)**
31. Question Result, ID, References **Sat, AR.IL.ILIVALIDATE.R, 195.452(l)(1)(ii) (195.452(j)(5)(i), 195.452(f)(4), 195.452(h), 195.452(c)(1), 195.591, 195.452(c)(1)(i)(A))**
 Question Text *Do the records for validating ILI assessment results indicate that the process was implemented?*
 Assets Covered **88980 (72)**
 Result Notes **No new ILI records available last run was 2019.**
32. Question Result, ID, References **Sat, AR.IL.ILIINTEGRATION.P, 195.452(f)(3) (195.452(g), 195.452(h))**
 Question Text *Does the process for evaluating ILI results include integration of all available information about the integrity of the pipeline?*
 Assets Covered **88980 (72)**
 Result Notes **IMP 8.1 ERW Seam evaluation assessment interval will not exceed 5 years.**
33. Question Result, ID, References **Sat, AR.IL.ILIINTEGRATION.R, 195.452(l)(1)(ii) (195.452(g), 195.452(f)(3), 195.452(h))**
 Question Text *Do the records indicate that the operator integrated other data/information when evaluating ILI tool data/results?*
 Assets Covered **88980 (72)**
 Result Notes **No new information. See Section 8.1 for ongoing assessments.**
34. Question Result, ID, References **NA, AR.IL.ILIIMPLEMENT.O, 195.452(b)(5)**
 Question Text *Have the ILI procedures been followed?*
 Assets Covered **88980 (72)**
 Result Notes **No such activity/condition was observed during the inspection. Not on site during ILI run.**

AR.PTI: Integrity Assessment Via Pressure Test

35. Question Result, ID, References **NA, AR.PTI.PRESSTESTACCEP.P, 195.452(f)(5) (195.304, 195.305, 195.306, 195.308, 195.452(j)(5)(ii))**
 Question Text *Does the process define acceptance criteria for a successful pressure test?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. ILI is used - not pressure testing.**

36. Question Result, ID, References **NA, AR.PTI.PRESSTESTCORR.P, 195.452(f)(3) (195.452(g)(3))**
 Question Text *Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
37. Question Result, ID, References **NA, AR.PTI.PRESSTESTRESULT.O, 195.452(b)(5) (195.452(c)(1)(i)(B), 195.452(j)(5)(ii), 195.304)**
 Question Text *Was the pressure test conducted in accordance with the procedures?*
 Assets Covered **88980 (72)**
 Result Notes **No such activity/condition was observed during the inspection.**
38. Question Result, ID, References **NA, AR.PTI.PRESSTESTRESULT.R, 195.310 (195.452(f)(2), 195.452(f)(5), 195.452(c), 195.452(l)(1)(ii))**
 Question Text *Do the pressure test records indicate compliance with Part 195, Subpart E?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
39. Question Result, ID, References **NA, AR.PTI.PRESSTESTCORR.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g)(3))**
 Question Text *When pressure testing was used as the integrity assessment method, do the records indicate that the effectiveness of the corrosion control program was documented?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Pressure testing is not used for integrity assessment.**

AR.OT: Other Technology

40. Question Result, ID, References **NA, AR.OT.OTPLAN.P, 195.452(f)(5) (195.452(c)(1)(i)(D), 195.452(j)(5)(iv), 195.416(d))**
 Question Text *If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
41. Question Result, ID, References **NA, AR.OT.OTPLAN.R, 195.452(l)(1)(ii) (195.452(j)(5)(iv), 195.452(f)(5), 195.452(c)(1)(i)(D), 195.416(d))**
 Question Text *Do the records indicate that the Other Technology integrity assessments were performed in accordance with procedures and vendor recommendations?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
42. Question Result, ID, References **NA, AR.OT.OTPLAN.O, 195.452(b)(5) (195.416(d))**
 Question Text *Has the process for the use of "Other Technology" been followed?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
43. Question Result, ID, References **NA, AR.OT.ASSESSMENTREVIEW.P, 195.452(f)(8) (195.452(j)(5), 195.416(d))**
 Question Text *Does the process specify qualification requirements for personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
44. Question Result, ID, References **NA, AR.OT.ASSESSMENTREVIEW.R, 195.452(l)(1)(ii) (195.452(f)(8), 195.452(j)(5), 195.416(d))**
 Question Text *Do the records pertaining to the selected integrity assessments indicate that personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology are qualified?*

Assets Covered 88980 (72)

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

AR.RCHCA: Repair Criteria (HCA)

45. Question Result, ID, References Sat, AR.RCHCA.DISCOVERY.P, 195.452(f)(4) (195.452(h)(2))

Question Text *Does the integrity assessment process define "discovery of condition" and the required time frame for anomalies in a pipeline segment that can affect an HCA?*

Assets Covered 88980 (72)

Result Notes IMP Management Program Section 6.3. "Immediate repair condition" is NTE 5 days in the procedure. Discovery of of condition (priority) is in Section 6.4 Discovery of Condition Timing (180 day) is in Section 7.2 Section 7.3 (60 day) and 7.4.4 is quantifying repair conditions.

46. Question Result, ID, References Sat, AR.RCHCA.IMSCHEDULE.P, 195.452(f)(4) (195.452(h)(3), 195.452(h)(4))

Question Text *Does the process include developing a prioritized schedule for evaluating and remediating all identified repair conditions consistent with the repair criteria and within the time frames found in 195.452(h)(4)?*

Assets Covered 88980 (72)

Result Notes 7.2-7.5 in IMP.

47. Question Result, ID, References Sat, AR.RCHCA.DISCOVERY.R, 195.452(l)(1)(ii) (195.452(h)(2), 195.452(f)(4))

Question Text *Do the records indicate that "discovery of condition" results for all anomalies occurred promptly, but no later than 180 days after the completion of the integrity assessment?*

Assets Covered 88980 (72)

Result Notes The repair was completed 9/25-10/1/2019. The vendor's final report was 7/19/2019.

A clockspring that didn't meet criteria requiring repair was installed 99th and McKinley.

48. Question Result, ID, References Sat, AR.RCHCA.IMPRC.P, 195.452(f)(4) (195.452(h)(1), 195.452(h)(4))

Question Text *Does the process include criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?*

Assets Covered 88980 (72)

Result Notes IMP 7.3

49. Question Result, ID, References Sat, AR.RCHCA.REMEDIATION.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4), 195.452(b)(5), 195.569)

Question Text *Do records indicate that anomaly remediation and documentation of remediation was performed in accordance with the process?*

Assets Covered 88980 (72)

Result Notes UT inspection report for 99th and Aquaduct was reviewed. Mistras performed.

Reviewed the FIR (Field Investigation Report) for 9-25 to 10-1-2019.

50. Question Result, ID, References Sat, AR.RCHCA.IMPRC.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(1), 195.452(h)(4))

Question Text *Do records indicate that prompt action was taken to address all anomalous conditions discovered through the integrity assessment or information analysis?*

Assets Covered 88980 (72)

Result Notes The operator met the 180 day requirement.

51. Question Result, ID, References NA, AR.RCHCA.REMEDIATION.O, 195.452(b)(5) (195.402(a), 195.402(c)(14), 195.422(a), 195.569, 195.589(c))

Question Text *From an observation of a remediation or repair at an excavation site, are anomaly remediation activities adequate, performed in accordance with the categorized remediation/repair schedule, and documented?*

Assets Covered 88980 (72)

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

52. Question Result, ID, References **Sat, AR.RCHCA.REMEDIATION.P, 195.452(f)(4) (195.452(h)(1), 195.422(b))**
 Question Text *Does the process require that remedial actions be performed in a manner that addresses the integrity issues raised by the assessment methods used and information analysis?*
 Assets Covered **88980 (72)**
 Result Notes **IMP 7.3-.7.5**
53. Question Result, ID, References **Sat, AR.RCHCA.PRESSREDUCE.P, 195.452(f)(4) (195.428, 195.452(h)(1)(i), 195.452(h)(1)(ii))**
 Question Text *Does the process for pressure reduction meet the code requirements?*
 Assets Covered **88980 (72)**
 Result Notes **Section 7.4.1**
54. Question Result, ID, References **Sat, AR.RCHCA.PRESSREDUCE.R, 195.452(l)(1)(ii) (195.404(a), 195.404(b), 195.452(h)(1)(ii), 195.452(h)(4)(i), 195.55(a), 195.56)**
 Question Text *Do the integrity assessment records indicate that the pressure reduction taken was acceptable and promptly implemented?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The operator did not take a pressure reduction in 2009, 2014, or 2019.**
55. Question Result, ID, References **Sat, AR.RCHCA.IMSCHEDULE.R, 195.452(l)(1)(ii) (195.452(h)(3), 195.452(h)(4))**
 Question Text *Do the records indicate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(4)?*
 Assets Covered **88980 (72)**
 Result Notes **They met the 180 day requirement.**
56. Question Result, ID, References **NA, AR.RCHCA.CRACKREMEDIATION.P, 195.452(f)(4) (195.452(h), 195.588(c))**
 Question Text *If the pipeline is susceptible to cracking, does the process include criteria for remedial actions to address integrity issues raised by the assessment method?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. A study of the susceptibility of cracking was done. Before the Keifner study, they did perform NDE (Dye-Pen) if they removed the coating. They have personnel that do Dye-Pen on site if needed. Maintenance Manual G-2 3.7**
57. Question Result, ID, References **NA, AR.RCHCA.CRACKREMEDIATION.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h)(4)(iii)(G), 195.588(c))**
 Question Text *If the pipeline is susceptible to cracking, do the records indicate that the remedial actions have been documented?*
 Assets Covered **88980 (72)**
 Result Notes **Not susceptible to seam cracking after performing the Veco study.**

AR.RMP: Repair Methods and Practices

58. 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 **Maintenance Manual Sections E-1, E-2, E-6**
59. Question Result, ID, References **NA, AR.RMP.SAFETY.O, 195.422(a) (195.402(c)(14), 195.452(h)(1))**
 Question Text *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?*
 Assets Covered **88980 (72)**
 Result Notes **No such activity/condition was observed during the inspection.**

60. Question Result, ID, References **Sat, AR.RMP.METHOD.P, 195.402(c)(3) (195.452(h)(1), 195.585)**
 Question Text *Does the process identify permissible repair methods for each type of defect?*
 Assets Covered **88980 (72)**
 Result Notes **Maintenance manual E-2 Section 6 contains this information.**
61. Question Result, ID, References **Sat, AR.RMP.METHOD.R, 195.404(c)(1) (195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1), 195.401(b)(2))**
 Question Text *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?*
 Assets Covered **88980 (72)**
 Result Notes **Repairs for this inspection time period were performed using 3 Clocksprings. OQ records were reviewed for the installers in 2020.**
62. Question Result, ID, References **Sat, AR.RMP.REPAIRQUAL.R, 195.505(b) (195.507(a), 195.505(c), 195.452(h)(1), 195.452(b)(5))**
 Question Text *From the records review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?*
 Assets Covered **88980 (72)**
 Result Notes **No repairs in the last 3 years.**
63. Question Result, ID, References **Sat, AR.RMP.PIPECONDITION.R, 195.404(c)(1) (195.404(c)(2), 195.452(l)(1)(ii))**
 Question Text *Do the repair records document all the information needed to understand the conditions of the pipe and its environment and also provide the information needed to support the Integrity Management program, when applicable?*
 Assets Covered **88980 (72)**
 Result Notes **This was on the FIR. It was reviewed.**
64. Question Result, ID, References **NA, AR.RMP.REPLACESTD.R, 195.404(a)(1) (195.422(b),)**
 Question Text *Were all replaced line pipe and/or components designed and constructed as required by Part 195?*
 Assets Covered **88980 (72)**
 Result Notes **No pipe replaced.**
65. Question Result, ID, References **NA, AR.RMP.PIPEMOVE.R, 195.424(a) (195.424(b), 195.424(c))**
 Question Text *From a review of selected records, were pipeline movements performed in accordance with 195.424?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
66. Question Result, ID, References **NA, AR.RMP.WELDERQUAL.R, 195.214(a) (195.214(b), 195.222(a), 195.222(b),)**
 Question Text *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
67. Question Result, ID, References **NA, AR.RMP.WELDQUAL.R, 195.226(a) (195.226(b), 195.226(c), 195.230(a), 195.230(b), 195.230(c),)**
 Question Text *From the review of the results of integrity assessment and remediation projects, were defects on new welds repaired in accordance with §195.226 or §195.230?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
68. Question Result, ID, References **NA, AR.RMP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234(a), 195.234(b), 195.234(c), 195.234(d), 195.234(e),)**
 Question Text *From the review of the results of remediation projects, were new welds inspected and examined in accordance with §195.228 or §195.234?*
 Assets Covered **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

69. Question Result, ID, References **Sat, AR.RMP.CRACKNDE.P, 195.452(f)(4) (195.452(h))**
Question Text *Does the process include appropriate NDE method(s) and other information gathering during the evaluation of cracks and cracking?*
Assets Covered **88980 (72)**
Result Notes **IMP 8.4**

70. Question Result, ID, References **NA, AR.RMP.CRACKNDE.R, 195.452(l)(1)(ii) (195.452(f)(4), 195.452(h), 195.404(c))**
Question Text *Do the records indicate that appropriate NDE method(s) were used and other information was gathered related to the evaluation of cracking?*
Assets Covered **88980 (72)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

DC.CO: Construction

71. Question Result, ID, References **Sat, DC.CO.VALVEPROTECT.O, 195.258(a)**
Question Text *Are valves accessible to authorized employees and protected from damage or tampering?*
Assets Covered **88980 (72)**
Result Notes **There are two below ground vaults and one above that is chain link fenced.**

72. Question Result, ID, References **Sat, DC.CO.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))**
Question Text *Are valves located as specified by 195.260?*
Assets Covered **88980 (72)**
Result Notes **Pipe not installed after April 10, 2023 that meets the length requirements of the valve rule. Entire line is 14.25 miles in length.**

DC.MO: Maintenance and Operations

73. 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, I-1**

TDC.650REGS: New API 650 Tanks - Part 195 Requirements

74. Question Result, ID, References **NA, TDC.650REGS.TANKSPEC.P, 195.132(b)(3) (API Std 650)**
Question Text *Does the process for new aboveground atmospheric breakout tanks require tank design and construction to meet the requirements of 195.132(b)(3)?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

75. Question Result, ID, References **NA, TDC.650REGS.TANKSPEC.R, 195.132(b)(3) (API Std 650)**
Question Text *Do the design records and drawings indicate new aboveground atmospheric breakout tanks are designed and constructed to the specifications required by 195.132(b)(3)?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

76. Question Result, ID, References **NA, TDC.650REGS.REPAIRSPEC.P, 195.205(b)(1) (API Std 650, API Std 653)**
Question Text *Are breakout tanks required to be repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?*
Assets Covered **88980 (72)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

77. Question Result, ID, References **NA, TDC.650REGS.REPAIRSPEC.R, 195.205(b)(1) (API Std 650, API Std 653)**
 Question Text *Do records indicate breakout tanks were repaired, altered, or reconstructed in compliance with the requirements of 195.205(b)(1)?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
78. Question Result, ID, References **NA, TDC.650REGS.CPDESIGN.P, 195.565 (195.563(d), 195.132(b)(3), API RP 651, Section 6.3.4, API RP 651, Section 6.3.5, API RP 651, Section 7.2.1, API RP 651, Section 11.4)**
 Question Text *Does the process for new aboveground breakout tanks require cathodic protection system design to conform with API 651, Sections 6.2 and 6.3, as required by 195.565?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
79. Question Result, ID, References **NA, TDC.650REGS.CPDESIGN.O, 195.565 (195.563(d), API RP 651, Section 6.3.4, API RP 651, Section 6.3.5, API RP 651, Section 7.2.1)**
 Question Text *Do field observations confirm new breakout tanks have cathodic protection installed in accordance with 195.565?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
80. Question Result, ID, References **NA, TDC.650REGS.IMPOUNDMENT.P, 195.264(a) (195.264(b), 195.264(c), 195.264(d), 195.264(e), NFPA 30)**
 Question Text *Does the process for new aboveground breakout tanks require impoundment(s) to meet the impoundment requirements of 195.264 in the event of tank spillage or failure?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TDC.650HYDRO: New API 650 Tanks - Hydrostatic Testing

81. Question Result, ID, References **NA, TDC.650HYDRO.HYDROTEST.P, 195.307(c) (195.310(a), 195.310(b), 195.132(b)(3), API 650, Section 7.3.5, API 650, Section 7.3.6, API 650, Appendix L.3, Line 14)**
 Question Text *Does the process for new aboveground breakout tanks require hydrostatic leak testing of tanks in accordance with 195.307(c)?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

FS.TSAPIINSPECT: Tanks and Storage - Inspection

82. Question Result, ID, References **NA, FS.TSAPIINSPECT.REPAIRLEAKTEST.P, 195.307(d) (195.310(a), 195.310(b), API 653)**
 Question Text *If the breakout tank first went into service after October 2, 2000 and was later repaired, altered, and/or reconstructed, does the process require the tank(s) to be hydrostatically leak tested in accordance with 195.307(d)?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
83. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOINSPECTION.R, 195.404(c)(3) (195.432(a))**
 Question Text *Do records document that breakout tanks that are not steel atmospheric or low pressure tanks or HVL steel tanks built according to API 2510 have been inspected at the proper interval and that deficiencies found during inspections have been corrected?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
84. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOINSRVCSINSP.P, 195.402(c)(3) (195.432(b))**
 Question Text *Does the process describe the interval and method for performing routine in-service inspections of steel atmospheric or low pressure breakout tanks?*
 Assets Covered **88980 (72)**

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

85. Question Result, ID, References NA, FS.TSAPIINSPECT.BOINSRVCINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received routine in-service inspections at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered 88980 (72)

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

86. Question Result, ID, References NA, FS.TSAPIINSPECT.BOEXTINSP.P, 195.402(c)(3) (195.432(b))

Question Text *Does the process describe the interval and method for performing external inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?*

Assets Covered 88980 (72)

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

87. Question Result, ID, References NA, FS.TSAPIINSPECT.BOEXTINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received external inspections at the required intervals and that deficiencies documented during inspections have been corrected within a reasonable time frame?*

Assets Covered 88980 (72)

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

88. Question Result, ID, References NA, FS.TSAPIINSPECT.BOEXTUTINSP.P, 195.402(c)(3) (195.432(b))

Question Text *Does the process describe the interval and method for performing external, ultrasonic thickness inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?*

Assets Covered 88980 (72)

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

89. Question Result, ID, References NA, FS.TSAPIINSPECT.BOEXTUTINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received ultrasonic thickness inspections at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered 88980 (72)

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

90. Question Result, ID, References NA, FS.TSAPIINSPECT.BOINTINSP.P, 195.402(c)(3) (195.432(b))

Question Text *Does the process describe the interval and method for performing formal internal inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?*

Assets Covered 88980 (72)

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

91. Question Result, ID, References NA, FS.TSAPIINSPECT.BOINTINSP.R, 195.404(c)(3) (195.432(b))

Question Text *Do records document that steel atmospheric or low pressure breakout tanks have received formal internal inspections at the required intervals and that deficiencies found during inspections have been documented?*

Assets Covered 88980 (72)

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

92. Question Result, ID, References NA, FS.TSAPIINSPECT.BOEXTINSPAPI2510.P, 195.402(c)(3) (195.432(c))

Question Text *Does the process describe the interval and method for performing visual external inspections of in-service pressure steel aboveground breakout tanks built to API Standard 2510?*

Assets Covered 88980 (72)

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

93. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOEXTINSPAPI2510.R, 195.404(c)(3) (195.432(c))**
 Question Text *Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 have received visual external inspections at the required intervals and that deficiencies found have been corrected?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
94. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOINTINSPAPI2510.P, 195.402(c)(3) (195.432(c))**
 Question Text *Does the process describe the interval and method for performing internal inspections of in-service pressure steel aboveground breakout tanks built to API Standard 2510?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
95. Question Result, ID, References **NA, FS.TSAPIINSPECT.BOINTINSPAPI2510.R, 195.404(c)(3) (195.432(c))**
 Question Text *Do records document that in-service pressure steel aboveground breakout tanks built to API Standard 2510 received internal inspections at the required intervals and that deficiencies found have been corrected?*
 Assets Covered **88980 (72)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

FS.FG: Facilities General

96. Question Result, ID, References **Sat, FS.FG.FACPROTECT.O, 195.436** (also presented in: PD.SN)
 Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*
 Assets Covered **88980 (72)**
 Result Notes **Every asset is protected from unauthorized entry.**
97. Question Result, ID, References **Sat, FS.FG.IGNITION.O, 195.438** (also presented in: PD.SN)
 Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*
 Assets Covered **88980 (72)**
 Result Notes **There is signage at the pumper facility inside USOR.**
98. Question Result, ID, References **Sat, FS.FG.SIGNAGE.O, 195.434** (also presented in: PD.SN)
 Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*
 Assets Covered **88980 (72)**
 Result Notes **There are signs and markers around each asset. (No breakout tanks in this unit)**
99. Question Result, ID, References **Sat, 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 **Maintenance Manual D-2 Section 4. but sort of N/A**
100. 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 **Maintenance Manual D-10**
101. 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 Maintenance Manual D-10

102. 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 Maintenance Manual D-14 Section 1.3 and also in the operations manual under Section 5.1.

103. Question Result, ID, References Sat, FS.FG.FIREPROT.O, 195.430(a) (195.430(b), 195.430(c), 195.262(e))
Question Text *Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly?*
Assets Covered 88980 (72)
Result Notes Pump Station extinguishers are maintained by the refinery and they have the records for the expiration dates. During the last standard inspection, I checked the tags on the extinguishers and the condition. JH checked the fire extinguishers with JW during this inspection. There were no issues.

FS.TS: Tanks and Storage

104. Question Result, ID, References NA, FS.TS.OVERFILLBO.P, 195.402(c)(3) (195.428(a), 195.428(c), 195.428(d))
Question Text *Does the process require adequate testing and inspection of overfill devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

105. Question Result, ID, References NA, FS.TS.OVERFILLBO.R, 195.404(c)(3) (195.428(a), 195.428(c), 195.428(d))
Question Text *Do records document the inspection and testing of overfill protection devices on aboveground breakout tanks at the required interval? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

106. Question Result, ID, References NA, FS.TS.OVERFILLBO.O, 195.428(c)
Question Text *Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.]*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

107. Question Result, ID, References NA, FS.TS.IGNITIONBO.P, 195.402(c)(3) (195.405(a))
Question Text *Does the process describe how the operator protects against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities of aboveground breakout tanks?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

108. Question Result, ID, References NA, FS.TS.IGNITIONBO.R, 195.404(c) (195.405(a))
Question Text *Do records indicate protection against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities of aboveground breakout tanks?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

109. Question Result, ID, References NA, FS.TS.FLOATINGROOF.P, 195.402(c)(3) (195.405(b))
Question Text *Does the process associated with access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance or repair activities of in-service tanks indicate that the*

operator has reviewed and considered the potentially hazardous conditions, safety practices and procedures in API Publication 2026?

Assets Covered 88980 (72)

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

110. Question Result, ID, References NA, FS.TS.FLOATINGROOF.R, 195.404(c) (195.405(b))

Question Text *Do records indicate access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance, or repair activities of in-service tanks is performed consistent with API Publication 2026?*

Assets Covered 88980 (72)

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

111. Question Result, ID, References NA, FS.TS.IMPOUNDBO.R, 195.404(c) (195.264(b))

Question Text *If a breakout tank first went into service after October 2, 2000 do records indicate it has an adequate impoundment?*

Assets Covered 88980 (72)

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

112. Question Result, ID, References NA, FS.TS.IMPOUNDBO.O, 195.264(b)

Question Text *If a breakout tank first went into service after October 2, 2000 does it have an adequate impoundment?*

Assets Covered 88980 (72)

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

113. Question Result, ID, References NA, FS.TS.VENTBO.R, 195.404(c) (195.264(d))

Question Text *Do records indicate that normal/emergency relief venting and pressure/vacuum-relieving devices installed on aboveground breakout tanks after October 2, 2000 are adequate?*

Assets Covered 88980 (72)

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

114. Question Result, ID, References NA, FS.TS.PRESSTESTBO.R, 195.310(a) (195.310(b), 195.307)

Question Text *Have aboveground breakout tanks been pressure tested to their corresponding API or ASME Standard or Specification and do pressure test records contain the required information?*

Assets Covered 88980 (72)

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

IM.HC: High Consequence Areas

115. Question Result, ID, References Sat, IM.HC.HCALLOCATION.P, 195.452(f)(1) (195.452(a), 195.452(d)(2), 195.452(b)(2))

Question Text *Does the process require the identification of HCA-affecting pipe segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?*

Assets Covered 88980 (72)

Result Notes IMP Section 5.2 (Last paragraph)

116. Question Result, ID, References Sat, IM.HC.HCALLOCATION.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a), 195.452(b)(2), 195.452(d)(2), 195.452(j)(1))

Question Text *Do records indicate that locations and boundaries of HCA-affecting pipe segments are correctly identified and maintained up-to-date?*

Assets Covered 88980 (72)

Result Notes Entire line is an HCA.

117. Question Result, ID, References Sat, IM.HC.HCALLOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2)) (also presented in: IM.CA)

Question Text *Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?*

Assets Covered 88980 (72)

Result Notes GRPs were briefly reviewed and it showed the identified segments and response plans for could affect segments.

118. Question Result, ID, References Sat, IM.HC.HCAIDENT.P, 195.452(f)(1) (195.452(a))
Question Text *Does the process include all locations where pipeline segments directly intersect a high consequence area?*
Assets Covered 88980 (72)
Result Notes There are segments for unique GRPs even though there entire line is in an HCA.
119. Question Result, ID, References Sat, IM.HC.HCAIDENT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))
Question Text *Do records indicate that all locations where a pipeline segment is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate technical justification is provided?*
Assets Covered 88980 (72)
Result Notes Entire line is in an HCA.
120. Question Result, ID, References Sat, IM.HC.HCARELEASE.P, 195.452(f)(1) (195.452(a))
Question Text *Does the process include methods to determine the locations and volume of potential commodity releases?*
Assets Covered 88980 (72)
Result Notes IMP Section 5.1 contains the reference to the analysis.
121. Question Result, ID, References Sat, IM.HC.HCARELEASE.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))
Question Text *Do records indicate that identified release locations and spill volumes are consistent with the documented process?*
Assets Covered 88980 (72)
Result Notes Imp Appendix A. Norwest Engineering Rev 2005 Chart C-3
122. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.P, 195.452(f)(1) (195.452(a))
Question Text *Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*
Assets Covered 88980 (72)
Result Notes Appendix A of the the IMP contains this.
123. Question Result, ID, References Sat, IM.HC.HCAOVERLAND.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))
Question Text *Do records indicate that the analysis of overland spread is consistent with the documented process?*
Assets Covered 88980 (72)
Result Notes Appendix A is the Norwest Study. That is the record of analysis.
124. Question Result, ID, References Sat, IM.HC.HCAH2OTRANSP.P, 195.452(f)(1) (195.452(a))
Question Text *Does the process include the analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs?*
Assets Covered 88980 (72)
Result Notes Section 3.7.2 of the Spill Response Plan. Appendix A of the IMP Plan.
125. Question Result, ID, References Sat, IM.HC.HCAH2OTRANSP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))
Question Text *Do records indicate that water transport analysis is consistent with the documented process?*
Assets Covered 88980 (72)
Result Notes Appendix A of IMP Plan (Norwest Plan)
126. Question Result, ID, References NA, IM.HC.HCAAIRDISP.P, 195.452(f)(1) (195.452(a))
Question Text *Does the process include the analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?*

Assets Covered 88980 (72)

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

127. Question Result, ID, References NA, IM.HC.HCAAIRDISP.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do the records indicate that the analysis of air dispersion of vapors is consistent with the documented process?*

Assets Covered 88980 (72)

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

128. Question Result, ID, References NA, IM.HC.HCAINDIRECT.P, 195.452(f)(1) (195.452(a))

Question Text *Does the process include all locations of pipeline segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?*

Assets Covered 88980 (72)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Entire line is an HCA. GRPs have been calculated for areas that could be affected outside the HCAs.

129. Question Result, ID, References Sat, IM.HC.HCAINDIRECT.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(a))

Question Text *Do the records indicate that endpoints of pipeline segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?*

Assets Covered 88980 (72)

Result Notes A buffer zone approach is not utilized. Entire line is an HCA. CA HCAs (For example, Blair Waterway and Commencement Bay) in Appendix A are evaluated, those areas are not in direct proximity with the pipeline.

130. Question Result, ID, References NA, IM.HC.HCACAT3.P, 195.452(f)(1) (195.452(b)(2), 195.452(a)(3))

Question Text *Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered 88980 (72)

Result Notes McChord Pipeline is a Category 2 Pipeline.

131. Question Result, ID, References NA, IM.HC.HCACAT3.R, 195.452(l)(1)(ii) (195.452(f)(1), 195.452(b)(2), 195.452(a)(3))

Question Text *Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Assets Covered 88980 (72)

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

IM.RA: Risk Analysis

132. Question Result, ID, References Sat, IM.RA.RADATA.O, 195.452(b)(5) (195.452(f)(3))

Question Text *Are field conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*

Assets Covered 88980 (72)

Result Notes No the field conditions (topography, ecological and drinking water USAs) match the risk assessment locations.

133. Question Result, ID, References Sat, IM.RA.RADATA.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text *Does the process include an analysis and integration of all available information about the integrity of the entire pipeline and the consequences of a failure?*

Assets Covered 88980 (72)

Result Notes IMP Appendix B contains segment risk factors.

134. Question Result, ID, References Sat, IM.RA.RADATA.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text *Do the records indicate that all available information has been integrated into the risk analysis?*

Assets Covered 88980 (72)

Result Notes Records reviewed showed that the best available information is in the risk analysis.

135. Question Result, ID, References Sat, IM.RA.RAMETHOD.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text Does the process include requirements for a risk analysis and the integration of all relevant risk factors, including the need to address potential risk of a compromised operations control system (e.g., cyber-attack), and all available information, when evaluating pipeline segments?

Assets Covered 88980 (72)

Result Notes IMP Appendix B and N/A for the cyber attack because not in the internet.

136. Question Result, ID, References Sat, IM.RA.RARERESULTS.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))

Question Text Do the records indicate that the results of the risk analysis process are useful for drawing conclusions and insights for decision making?

Assets Covered 88980 (72)

Result Notes Section 9.1 and Appendix B. The risk analysis was validated by the 2017 spill.

137. Question Result, ID, References Sat, IM.RA.RASEGMENT.P, 195.452(f)(3) (195.452(g), 195.452(j))

Question Text Does the risk analysis process consider and incorporate the variation in risk factors along the pipeline such that segment-specific risk results and insights are obtained?

Assets Covered 88980 (72)

Result Notes IMP Appendix B-7

138. Question Result, ID, References Sat, IM.RA.RAMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(e))

Question Text Do the records indicate the evaluation of the methodology(ies) used for evaluating risks to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments?

Assets Covered 88980 (72)

Result Notes Section 9 of the IMP has risk factors. i.e. Section 9.1 is still for Third Party Damage

IM.CA: Continual Evaluation and Assessment

139. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 195.452(f)(5) (195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text Does the process include requirements for performing periodic evaluations of pipeline integrity?

Assets Covered 88980 (72)

Result Notes IMP Section 8.1 has the 5 year interval.

140. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a))

Question Text Do records indicate that evaluations of pipeline integrity are being performed periodically?

Assets Covered 88980 (72)

Result Notes Tool runs completed 2004, 2009, 2014, 2019. Another to be performed in 2024.

141. Question Result, ID, References Sat, IM.CA.ASSESSINTERVAL.P, 195.452(f)(5) (195.452(e), 195.452(g), 195.452(j)(3))

Question Text Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval?

Assets Covered 88980 (72)

Result Notes Imp Section 8.1 NTE 5 years

142. Question Result, ID, References Sat, IM.CA.ASSESSINTERVAL.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(3), 195.452(g))

Question Text Do the records indicate that the assessment intervals are consistent with the risks identified for the pipe segment and the results of previous assessments?

Assets Covered 88980 (72)

Result Notes Records were reviewed to check the assessment interval. IMP Section 8.1 discusses the interval.

143. Question Result, ID, References Sat, IM.CA.ASSESSMETHOD.P, 195.452(f)(5) (195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591)

Question Text *Does the process specify assessment methods that are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered 88980 (72)

Result Notes IMP Section 5.3.2. ILI

144. Question Result, ID, Sat, IM.CA.ASSESSMETHOD.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(j)(5), 195.452(g),
References 195.452(c)(1)(i)(A), 195.591)

Question Text *Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment?*

Assets Covered 88980 (72)

Result Notes Section 5.3.1 and 5.3.2 as well as the seam study report by Kiefner substantiates the use of a standard MFL tool.

145. Question Result, ID, Sat, IM.CA.ASSESSNOTIFY.P, 195.452(f)(5) (195.452(j)(4), 195.452(m))
References

Question Text *Does the process include methodology for submitting variance notifications to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered 88980 (72)

Result Notes IMP Section 13 Table 1

146. Question Result, ID, NA, IM.CA.ASSESSNOTIFY.R, 195.452(l)(1)(ii) (195.452(f)(5), 195.452(m), 195.452(j)(4))
References

Question Text *Do the records indicate that variance notifications been submitted to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval?*

Assets Covered 88980 (72)

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

IM.PM: Preventive and Mitigative Measures

147. Question Result, ID, Sat, IM.PM.PMMMEASURES.P, 195.452(f)(6) (195.452(i)(1), 195.452(i)(2), 195 Appendix C, Section III,
References API Standard 1160)

Question Text *Does the Integrity Management Program include a process for the identification and evaluation of preventive & mitigative measures (P&M measures), resulting from the risk analysis, to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area (HCA)?*

Assets Covered 88980 (72)

Result Notes Section 9 contains this. EFRDS in 9.3

148. Question Result, ID, Sat, IM.PM.PMMMEASURES.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195
References Appendix C, Section VI, API Standard 1160)

Question Text *Do records demonstrate that the process of identification and evaluation for Preventive & Mitigative Measures (P&M Measures) has been applied in accordance with the documented process?*

Assets Covered 88980 (72)

Result Notes Overhead power line location information added in consideration of AC ground faults. Additional CP test stations added to mitigate corrosion threats.

149. Question Result, ID, Sat, IM.PM.PMMIMPLEMENT.O, 195.452(b)(5) (195.452(i)(1), 195.452(i)(2), 195.452(i)(3),
References 195.452(i)(4))

Question Text *Have preventive and mitigative actions been implemented as described in the records?*

Assets Covered 88980 (72)

Result Notes Yes the test station at 4224 Waller was installed.

150. Question Result, ID, Sat, IM.PM.PMMMIGATIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))
References

Question Text *Do the records indicate that mitigative actions have been considered and implemented?*

Assets Covered 88980 (72)

Result Notes Yes, These have been implemented. Dig information reviewed for the test station location.

151. Question Result, ID, Sat, IM.PM.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(f)(6), 195.452(i)(1), 195.452(i)(2))
References

Question Text *Do the records indicate that preventive actions have been considered and implemented?*

Assets Covered 88980 (72)

Result Notes Overhead powerlines in some areas and test stations were installed. Reviewed ROW inspections, 100% positive response to locate requests, ROW marker addition, weekly patrols, and increased rectifier operation checks. After the 2014 inspection, AC interference was mitigated by MPL putting the HV powerlines onto their system, test stations, and storm sewer locations.

152. Question Result, ID, [Sat, IM.PM.PMMRISKANALYSIS.P, 195.452\(f\)\(6\) \(195.452\(i\)\(1\), 195.452\(i\)\(2\), 195 Appendix C, Section II, API Standard 1160\)](#)

Question Text *Does the Integrity Management Program include conducting a risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection?*

Assets Covered 88980 (72)

Result Notes IMP Section 5.1 contains this. Section 5.2 states that it was done in 2005 and 2010 and any new HCAs will be incorporated.

153. Question Result, ID, [Sat, IM.PM.PMMRISKANALYSIS.R, 195.452\(l\)\(1\)\(ii\) \(195.452\(f\)\(6\), 195.452\(i\)\(1\), 195.452\(i\)\(2\), 195 Appendix C, Section VI, API Standard 1160\)](#)

Question Text *Do records demonstrate that an adequate risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection was performed?*

Assets Covered 88980 (72)

Result Notes IMP Appendix B is the actual risk analysis.

154. Question Result, ID, [Sat, IM.PM.IMLEAKDETEVAL.P, 195.452\(f\)\(6\) \(195.452\(i\)\(3\), 195 Appendix C, Section III, API Standard 1160\)](#)

Question Text *Does the Integrity Management Program include a process for the evaluation of leak detection capabilities and modifying, as necessary, to protect the high consequence areas?*

Assets Covered 88980 (72)

Result Notes Section 9.2 contains the CPM system detail.

155. Question Result, ID, [Sat, IM.PM.IMLEAKDETEVAL.R, 195.452\(l\)\(1\)\(ii\) \(195.452\(f\)\(6\), 195.452\(i\)\(3\), 195 Appendix C, Section VI, API Standard 1160\)](#)

Question Text *Do records indicate that all required and other relevant leak detection evaluation factors have been evaluated to ensure the protection of HCAs?*

Assets Covered 88980 (72)

Result Notes Per MPL Manual. Spill response personnel are local (including on site personnel) An evaluation of the leak detection system was performed after the 2017 TPD incident and it performed appropriately. During the August 2nd, 2017 incident, leak detection alarms worked exactly as intended, and Controller (Board Operator) response was timely and appropriate. The first alarm occurred approximately 30 seconds after the puncture, and the pipeline was shut down in 6 minutes. There has not been another event since 2017.

156. Question Result, ID, [Sat, IM.PM.PMMEFRD.P, 195.452\(f\)\(6\) \(195.452\(i\)\(4\), 195.452\(i\)\(1\), 195.452\(i\)\(2\), API Standard 1160\)](#)

Question Text *Does the Integrity Management Program include a preventive & mitigative (P&M) measures process that specifically addresses the identification, evaluation, and application of EFRDs to protect high consequence areas in the event of a hazardous liquid pipeline release?*

Assets Covered 88980 (72)

Result Notes This is in Section 9.3 (EFRDs) MPL does use a check valve as an EFRD.

157. Question Result, ID, [Sat, IM.PM.PMMEFRD.R, 195.452\(l\)\(1\)\(ii\) \(195.452\(f\)\(6\), 195.452\(i\)\(4\), 195 Appendix C, Section VI, API Standard 1160\)](#)

Question Text *Do the records demonstrate that all required and other relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?*

Assets Covered 88980 (72)

Result Notes Appendix C This is in Section 9.3 (EFRDs) MPL does use a check valve as an EFRD.

IM.FACIL: Facilities

158. Question Result, ID, [NA, IM.FACIL.FACILIDENT.P, 195.452\(f\)\(1\)](#) (also presented in: TDC.IMFACIL)

Question Text *Does the program include a written process for identification of facilities that could affect an HCA?*

Assets Covered 88980 (72)

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

159. Question Result, ID, References **NA, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(2))** (also presented in: TDC.IMFACIL)
 Question Text *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*
 Assets Covered **88980 (72)**
 Result Notes **The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.**
160. Question Result, ID, References **NA, IM.FACIL.RISKANAL.P, 195.452(f)(3) (195.452(g), 195.452(j))**
 Question Text *Does the process include approaches to identify and evaluate the risks of facilities that can affect HCAs?*
 Assets Covered **88980 (72)**
 Result Notes **The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.**
161. Question Result, ID, References **NA, IM.FACIL.RISKANAL.R, 195.452(l)(1)(ii) (195.452(f)(3), 195.452(g), 195.452(j))**
 Question Text *Do the records indicate that the analysis of risk of facilities has been performed as required?*
 Assets Covered **88980 (72)**
 Result Notes **The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.**
162. Question Result, ID, References **NA, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i))** (also presented in: TDC.IMFACIL)
 Question Text *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*
 Assets Covered **88980 (72)**
 Result Notes **The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.**
163. Question Result, ID, References **NA, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii)** (also presented in: TDC.IMFACIL)
 Question Text *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*
 Assets Covered **88980 (72)**
 Result Notes **The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.**
164. Question Result, ID, References **NA, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i))** (also presented in: TDC.IMFACIL)
 Question Text *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*
 Assets Covered **88980 (72)**
 Result Notes **The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.**
165. Question Result, ID, References **NA, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii)** (also presented in: TDC.IMFACIL)
 Question Text *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*
 Assets Covered **88980 (72)**
 Result Notes **The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.**
166. Question Result, ID, References **NA, IM.FACIL.AIRDISP.P, 195.452(f)(1) (195.452(l)(1)(i))**

Question Text *Where the facility handles HVLs or Volatile Liquids, does the process include an analysis of the air dispersion of vapors released from the facility to determine effects on HCAs?*

Assets Covered 88980 (72)

Result Notes No HVLs or Volatile Liquids

167. Question Result, ID, References NA, IM.FACIL.AIRDISP.R, 195.452(I)(1)(ii)

Question Text *Where the facility handles HVLs or Volatile Liquids, do the records indicate that the analysis of air dispersion of vapors from the facility is consistent with the process requirements?*

Assets Covered 88980 (72)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. None of this product type.

168. Question Result, ID, References NA, IM.FACIL.PERIODEVAL.P, 195.452(f)(5) (195.452(g), 195.452(j)(1), 195.452(j)(2))

Question Text *Does the process include requirements for performing continual evaluations of facility integrity?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

169. Question Result, ID, References NA, IM.FACIL.PERIODEVAL.R, 195.452(I)(1)(ii) (195.452(j)(2))

Question Text *Do the records indicate that periodic evaluations of integrity at facilities affecting HCAs have been performed?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

170. Question Result, ID, References NA, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

171. Question Result, ID, References NA, IM.FACIL.PMMPREVENTIVE.R, 195.452(I)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

172. Question Result, ID, References NA, IM.FACIL.PMMMIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: TDC.IMFACIL)

Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

173. Question Result, ID, References NA, IM.FACIL.PMMMIGATIVE.R, 195.452(I)(1)(ii) (195.452(i)(1)) (also presented in: TDC.IMFACIL)

Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

174. Question Result, ID, References NA, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: TDC.IMFACIL)

Question Text Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

IM.QA: Quality Assurance

175. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.P, 195.452(f)(7) (195.452(k))

Question Text Does the process for evaluating IM program effectiveness include the elements necessary to conduct a meaningful evaluation?

Assets Covered 88980 (72)

Result Notes There is a PM to do an annual review. Appendix D is the checklist. The procedure is in the IMP.

176. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

Question Text Do the records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?

Assets Covered 88980 (72)

Result Notes Reviewed three years of evaluations. (2019-2022 were reviewed) No trends during that period that were concerning.

177. Question Result, ID, References Sat, IM.QA.RECORDS.P, 195.402(c)(3) (195.452(l)(1))

Question Text Does the process ensure that the records required for the integrity management program are maintained?

Assets Covered 88980 (72)

Result Notes Imp 6.6. and 7.7, and Section 8.3.

178. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.P, 195.452(f)(7) (195.452(k))

Question Text Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?

Assets Covered 88980 (72)

Result Notes Section 10 of the IMP outlines the use of Appendix D.

179. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.R, 195.452(l)(1)(ii) (195.452(f)(7), 195.452(k))

Question Text Do the records indicate that performance metrics are providing meaningful insight into integrity management program performance?

Assets Covered 88980 (72)

Result Notes Appendix D-1 checklists. No action items required.

180. Question Result, ID, References Sat, IM.QA.RECORDS.R, 195.452(l)(1)(ii)

Question Text Do the records indicate that the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity?

Assets Covered 88980 (72)

Result Notes IMP appendices are used. (Log sheets, .etc)

MO.LO: Liquid Pipeline Operations

181. 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 Maint Manual B-1.

182. Question Result, ID, References Sat, MO.LO.OMHISTORY.R, 195.404(a) (195.404(c), 195.9, 195.402(c)(1))

Question Text *Do records indicate current maps and records of the pipeline system are maintained and made available as necessary?*

Assets Covered 88980 (72)

Result Notes ILI Dig records and the Pipeline Atlas.

RPT.NR: Notices and Reporting

183. Question Result, ID, References Sat, RPT.NR.NOTIFYIMP.P, 195.452(f)(5) (195.452(j)(4), 195.452(h)(1), 195.452(m))

Question Text *Does the process include a requirement for submitting an IMP notification for each of the following circumstances: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered 88980 (72)

Result Notes IMP Section 13 and Section 7.4.1 pressure reduction

184. Question Result, ID, References NA, RPT.NR.NOTIFYIMP.R, 195.452(l)(1)(ii) (195.452(m), 195.452(j)(4), 195.452(h)(1), 195.452(c)(1))

Question Text *Do the records indicate that the operator submitted IMP notification(s) for any of the following circumstances, when it was necessary to do so: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)?*

Assets Covered 88980 (72)

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

RPT.RR: Regulatory Reporting (Traditional)

185. Question Result, ID, References NA, RPT.RR.ANNUALREPORTIMINSPECT.R, 195.49

Question Text *Do the records indicate that the Annual Report Part F Data is complete and accurate?*

Assets Covered 88980 (72)

Result Notes Appendix D-1 checklists. No action items required.

186. Question Result, ID, References NA, RPT.RR.ANNUALREPORTIMASSESS.R, 195.49

Question Text *Is Annual Report Part G data complete and accurate?*

Assets Covered 88980 (72)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. 2019 was the last assessment.

TD.ATM: Atmospheric Corrosion

187. 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 E-8 Section 1.6.

188. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.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 Maint manual D-3 Section 2.3

189. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 195.589(c) (195.583(a), 195.583(b), 195.583(c))
Question Text *Do records document inspection of aboveground pipe exposed to atmospheric corrosion?*
Assets Covered 88980 (72)
Result Notes PM0972 is the record. This is done weekly. Irregular conditions
190. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 195.583(c) (195.581(a))
Question Text *Is aboveground pipe that is exposed to atmospheric corrosion protected?*
Assets Covered 88980 (72)
Result Notes There were no issues with any of the above ground coatings. JH looked at this.

TD.CPBO: External Corrosion - Breakout Tank Cathodic Protection

191. Question Result, ID, References NA, TD.CPBO.BO651.P, 195.402(c)(3) (195.563(d), 195.565)
Question Text *Does the process describe when cathodic protection must be installed on breakout tanks?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
192. Question Result, ID, References NA, TD.CPBO.BO.P, 195.402(c)(3) (195.573(d))
Question Text *Does the process adequately detail when and how cathodic protection systems will be inspected on breakout tanks?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
193. Question Result, ID, References NA, TD.CPBO.BO.R, 195.589(c) (195.573(d))
Question Text *Do records adequately document when and how cathodic protection systems were inspected on breakout tanks?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
194. Question Result, ID, References NA, TD.CPBO.BO.O, 195.573(d)
Question Text *Are cathodic protection monitoring tests performed correctly on breakout tank bottoms?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
195. Question Result, ID, References NA, TD.CPBO.DEFICIENCYBO.P, 195.402(c)(3) (195.573(e))
Question Text *Does the process require correction of any identified deficiencies in corrosion control for breakout tanks?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
196. Question Result, ID, References NA, TD.CPBO.DEFICIENCYBO.R, 195.589(c) (195.573(e))
Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in breakout tank corrosion control?*
Assets Covered 88980 (72)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

TD.CP: External Corrosion - Cathodic Protection

197. Question Result, ID, References Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CPMONITOR)

Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*

Assets Covered 88980 (72)

Result Notes A new TS (Test Station) was installed in 2019 at Tucci (business) at 4224 Waller Rd. It is in the records. Last 3 years of NW Corrosion surveys were reviewed. No issues.

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

198. 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 Section D-6 Maintenance Manual Part 2.1.1-2.1.3

199. 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 Maintenance Manual Section D-6 part 3.7

TD.ICP: Internal Corrosion - Preventive Measures

200. Question Result, ID, References NA, TD.ICP.BOLINING.R, 195.589(c) (195.579(d))

Question Text *Do records document the adequate installation of breakout tank bottom linings?*

Assets Covered 88980 (72)

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

TDC.IMFACIL: Integrity Management for Facilities (Re-Presented)

201. Question Result, ID, References NA, IM.FACIL.FACILIDENT.P, 195.452(f)(1) (also presented in: IM.FACIL)

Question Text *Does the program include a written process for identification of facilities that could affect an HCA?*

Assets Covered 88980 (72)

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

202. Question Result, ID, References NA, IM.FACIL.FACILIDENT.R, 195.452(l)(1)(i) (195.452(b)(2), 195.452(d)(2)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

203. Question Result, ID, References NA, IM.FACIL.RELEASE.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

Question Text *Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

204. Question Result, ID, References NA, IM.FACIL.RELEASE.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

Question Text *Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

205. Question Result, ID, References NA, IM.FACIL.SPREAD.P, 195.452(f)(1) (195.452(l)(1)(i)) (also presented in: IM.FACIL)

Question Text *Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

206. Question Result, ID, References NA, IM.FACIL.SPREAD.R, 195.452(l)(1)(ii) (also presented in: IM.FACIL)

Question Text *Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

207. Question Result, ID, References NA, IM.FACIL.PMMPREVENTIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

Question Text *Does the process include requirements for identification of facility preventive measures to protect the HCAs?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

208. Question Result, ID, References NA, IM.FACIL.PMMPREVENTIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

209. Question Result, ID, References NA, IM.FACIL.PMMMIGATIVE.P, 195.452(f)(6) (195.452(i)) (also presented in: IM.FACIL)

Question Text *Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

210. Question Result, ID, References NA, IM.FACIL.PMMMIGATIVE.R, 195.452(l)(1)(ii) (195.452(i)(1)) (also presented in: IM.FACIL)

Question Text *Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

211. Question Result, ID, References NA, IM.FACIL.PMMIMPLEMENT.O, 195.452(i)(1) (also presented in: IM.FACIL)

Question Text *Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed?*

Assets Covered 88980 (72)

Result Notes The only "facility" is the pump station inside USOR's refinery. Like a compressor, jurisdiction starts at the outlet flange. It is part of a Spill Response Plan. The pipeline serving the pump station is production and non-jurisdictional.

IM.CA: Continual Evaluation and Assessment

212. Question Result, ID, Sat, IM.HC.HCALLOCATION.O, 195.452(b)(5) (195.452(a), 195.452(b)(2), 195.452(f)(1), 195.452(j)(2))
References (also presented in: IM.HC)

Question Text *Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program?*

Assets Covered 88980 (72)

Result Notes GRPs were briefly reviewed and it showed the identified segments and response plans for could affect segments.

PD.SN: Facilities Signage and Security

213. Question Result, ID, Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: FS.FG)
References

Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*

Assets Covered 88980 (72)

Result Notes Every asset is protected from unauthorized entry.

214. Question Result, ID, Sat, FS.FG.IGNITION.O, 195.438 (also presented in: FS.FG)
References

Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*

Assets Covered 88980 (72)

Result Notes There is signage at the pumper facility inside USOR.

215. Question Result, ID, Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: FS.FG)
References

Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*

Assets Covered 88980 (72)

Result Notes There are signs and markers around each asset. (No breakout tanks in this unit)

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

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 Maintenance Manual D-10

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

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

Assets Covered 88980 (72)

Result Notes Maintenance Manual D-10

218. Question Result, ID, Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: FS.FG)
References

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 Maintenance Manual D-2 Section 4. but sort of N/A

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

219. Question Result, ID, References **Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b))** (also presented in: TD.CP)

Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*

Assets Covered **88980 (72)**

Result Notes **A new TS (Test Station) was installed in 2019 at Tucci (business) at 4224 Waller Rd. It is in the records. Last 3 years of NW Corrosion surveys were reviewed. No issues.**

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.