

Probable Violations/Concerns:

Provers at the Fairchild and Spokane delivery stations are insulated. There is no indication that atmospheric surveys included a check for corrosion under insulation on the provers.

Follow up on the history of prior offenses that are still open: N/A

Prior Offenses (for the past 5 years)		
CPF #	What type of open enforcement action(s)?	Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)

Recommendations:

Issue warning letter for probable violation noted.
Maintain regular inspection interval frequency.
Recommend scheduling O&M review in 2010. Last team review performed May 2005.

Comments:

The operator used the 850 mV on criteria to determine compliance with NACE criteria. They stated that IR drop is considered since ILI data and exposed pipe reports have never detected corrosion. The operator intends on doing some close interval surveys during the next year and will also establish native readings for the system.

Attachments:

- Field Data Collection Form
- Form 3 Abbreviated Procedures Standard Inspection Report of a Liquid Pipeline Carrier
- Form 15 Operator Qualification Field Inspection Protocol Form
- Form 19 Hazardous Liquid IMP Field Verification Inspection
- Violation Report