Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Inspection Checklist, Cover Letter and Field Report, and OQ Field Validation Form** are to be submitted to the Senior Engineer within **30 days** from completion of the inspection.

Inspection Report				
Docket Number	**PL-100012**			
Inspector Name & Submit Date	**Al Jones May 26, 2010**			
Chief Eng Name/Review/Date	**Joe Subsits**			
Operator Information				
Name of Operator:	**McChord Pipeline Company**		**OPID #:**	**31049**
Name of Unit(s):	**McChord Pipeline Company**			
Records Location:	**3001 Marshall Ave.; Tacoma, WA.**			
Date(s) of Last Review:	**March 2007**	**Inspection Date**	**May 17-19, 2010**	

Inspection Summary:

The inspection was observed under the auspices of PHMSA representative, Glynn Blanton, Transportation Specialist with the Office of Pipeline Safety.

Pipeline:

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. 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 is within a HCA with about 400 foot elevation differential. The pipeline transport 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 pig completed in 2009.

Record Review:

A review of records included: cathodic protection (CP), rectifiers, maintenance of valves, welding, and pressure recording data. Emergency Plan, liaison with Fire, Police, Port of Tacoma and other Public Officials, leak detection and alarm records, public education/awareness program, list of current excavators, One-Call records, and Safety related condition reports.

Field Inspection:

Field inspection included: pressure relief, pump station, pressure sensors, pipe supports, atmospheric corrosion program, facility security, SCADA system, and firefighting equipment, right-of-way condition, and line markers. Mainline block valves for security and signs. CP readings at: test stations, anode sites, and rectifier.

HQ Address:		**System/Unit Address:**	
McChord Pipeline Company 3001 Marshall Avenue Tacoma, Washington 98421		Same as HQ address	
Co. Official:	Al Cabodi, President	**Phone No.:**	253-383-1651
Phone No.:	253-383-1651	**Fax No.:**	253-383-9970
Fax No.:	253-383-9970	**Emergency Phone No.:**	253-383-1651
Emergency Phone No.:	253-383-1651		

Persons Interviewed	Title	Phone No.
Corey G. Herrick	Chief Engineer	253-680-6653
John P. Williamson	Chief Inspector	253-593-6085
Frank Veitenheimer	SCADA Operator	

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UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection. (check one below and enter appropriate date)		
Team inspection was performed (Within the past five years.) or,	Date:	**May 2010**
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	**N/A**

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		**S**	**U**	**NA**	**NC**
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	**X**			

Comments:

	RECORDS REVIEW		**S**	**U**	**NA**	**NC**
		CONVERSION TO SERVICE				
1.	**195.5(a)(2)**	All aboveground segments of the pipeline, and appropriately selected underground segments must be visually inspected for physical defects and operating conditions which reasonably could be expected to impair the strength or tightness of the pipeline.			**X**	
2.	**195.5(c)**	Pipeline Records (Life of System)			**X**	
3.		Pipeline Investigations			**X**	
4.		Pipeline Testing			**X**	
5.		Pipeline Repairs			**X**	
6.		Pipeline Replacements			**X**	
7.		Pipeline Alterations			**X**	
		REGULATED RURAL GATHERING LINES	**S**	**U**	**NA**	**NC**
8.	**195.11(a)**	Operator has identified pipelines that are Regulated Rural Gathering Lines that meet all of the following criteria: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter from 6 5/8 inches to 8 5/8 inches; (2) located in or within one-quarter mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			**X**	
9.	**195.11(b)**	Operator has prepared written procedures to carry out the requirements of **195.11.** (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). • Subpart B Reporting • Corrosion Control • Damage Prevention • Public Awareness • Establish MAOP • Line Markers • Operator Qualification			**X**	

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10.	**195.11(c)**	If a new USA is identified after July 3, 2008, the operator must implement the requirements in paragraphs (b)(2 - 8), and (b)(11) for affected pipelines within 6 months of identification. For steel pipelines, comply with the deadlines in paragraphs (b)(9 & 10). (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			X	
11.	**195.11(d)**	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) of this section and the records required to comply with (b)(10) of this section, for the life of the pipe. (2) Records necessary to demonstrate compliance (b)(2 – 9 & 11) of this section according to the record retention requirements of the referenced section or subpart.			X	

Comments:
Items #1-#11: No conversions to service. No gathering lines.

LOW-STRESS PIPELINES IN RURAL AREA			**S**	**U**	**NA**	**NC**
12.	**195.12(a)**	Operator has identified pipelines that are Regulated Low-stress Pipelines in Rural Areas that meet all of the following criteria: (except for those already covered by 49 CFR 195) (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter of 8 5/8 inches or more; (2) located in or within one-half mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
13.	**1959.12(b)**	Operator has prepared written procedures to carry out the requirements of **195.12.** (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). • Subpart B Reporting • Establish Integrity Management Plan • All Part 195 Safety Requirements			X	
14.	**195.12 (c)(1)**	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).			X	
15.	**195.12(d)**	If, after July 3, 2008, a new USA is identified, the operator must implement the requirements in paragraphs (b)(2)(i) for affected pipelines within 12 months of identification. (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			X	
16.	**195.12(d)**	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) for the life of the pipeline. (2) Records necessary to demonstrate compliance (b)(2 – 4)according to the record retention requirements of the referenced section or subpart.			X	

Comments:
Items #12-#16: No low stress lines.

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REPORTING							
17.	49 U.S.C. 60132, Subsection (b)	**Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002** Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. If no modifications have occurred since the last complete submission (including operator contact information), send an email stating that fact. Include operator contact information with all updates.	X			
18.	195.48/.49	Annual Report (DOT form RSPA F7000-1.1(Beginning no later than June 15, 2005) (As of 1/05/2009, an operator of a rural low-stress hazardous liquid pipeline is not required to complete Parts J and K of the hazardous liquid annual report form (PHMSA F 7000-1.1) required by 195.49 or to provide the estimate of total miles that could affect high consequence areas in Part B of that form.)	X			
19.	195.52	Telephonic Reports to NRC (800-424-8802)			X	
20.	195.54(a)	Written Accident Reports (DOT Form 7000-1)			X	
21.	195.54 (b)	Supplemental Accident Reports (DOT Form 7000-1)			X	
22.	195.56	Safety Related Conditions			X	
23.	195.57	Offshore Pipeline Condition Reports			X	
24.	195.59	Abandoned Underwater Facility Reports			X	
25.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction	X			
26.	480-75-620	Was MOP changed based on hydrotest? Report submitted?			X	
27.	480-75-630(3)	24 hour notification for emergency shutdown, material defects or damage that impact service ability			X	

Comments:
Item #19-#24: No incidents to report.
Item #25: In August 2009, a 17 foot section of pipe was removed and replaced with a new pipe section bent to cross over the existing 52-inch water main.
Item #26: No change in MOP of pipeline.
Item #27: No emergency shutdown of pipeline.

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		CONSTRUCTION	S	U	NA	NC
28.	195.120	Passage of internal inspection devices. (See exceptions under .120(b) and (c))	X			
29.	195.204	Construction Inspector Training/Qualification	X			
30.	195.214(b)	Test Results to Qualify Welding Procedures	X			
31.	195.222	Welder Qualification	X			
32.	Alert Notice 3/13/87	In the welding of repair sleeves and fittings, do the operator's procedures give consideration to the use of low hydrogen welding rods, cooling rate of the weld, metallurgy of the materials being welded (weldability carbon equivalent) and proper support of the pipe in the ditch?				
33.	195.234(b)	Nondestructive Technician Qualification	X			
34.	195.589	Cathodic Protection	X			
35.	195.266	Construction Records	X			
36.	195.266(a)	Total Number of Girth Welds	X			
37.		Number of Welds Inspected by NDT	X			
38.		Number of Welds Rejected	X			
39.		Disposition of each Weld Rejected	X			
40.	195.266(b)	Amount, Location, Cover of each Size of Pipe Installed	X			
41.	195.266(c)	Location of each Crossing with another Pipeline	X			
42.	195.266(d)	Location of each buried Utility Crossing	X			
43.	195.266(e)	Location of Overhead Crossings	X			
44.	195.266(f)	Location of each Valve and Test Station	X			
		PRESSURE TESTING	**S**	**U**	**NA**	**NC**
45.	195.310	Pipeline Test Record	X			
46.	195.305(b)	Manufacturer Testing of Components. **Maintenance Manual Section G-3**	X			
47.	195.308	Records of Pre-tested Pipe	X			

Comments:

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		OPERATION & MAINTENANCE	S	U	NA	NC
48.	195.402(a)	Annual Review of O&M Manual (**1 per yr/15 months**)	X			
49.	195.402(c)(4)	Determination of Areas requiring immediate response for Failures or Malfunctions	X			
50.	195.402(c)(10)	Abandonment of Facilities			X	
51.	195.402(c)(12)	Establishment/Maintaining liaison with Fire, Police, and other Public Officials. **Maintenance Manual Section J-2**	X			
52.	195.402(c)(13)	Periodic review of personnel work – effectiveness of normal O&M procedures	X			
53.	195.402(d)(1)	Response to Abnormal Pipeline Operations				
54.	195.402(d)(5)	Periodic review of personnel work – effectiveness of abnormal operation procedures	X			
55.	195.402(e)(1)	Notices which require immediate response	X			
56.	195.402(e)(2)	Prompt and effective response to each type of emergency **Note:** Review operator records of previous accidents and failures including third-party damage and leak response	X			
57.	195.402(e)(7)	Notifications to Fire, Police, and other Public Officials of an Emergency	X			
58.	195.402(e)(9)	Post Accident Reviews	X			
59.	195.403(a)	Emergency Response Personnel Training Program. **Administrative Manual Section B-1.3.2**	X			
60.	195.403(b)	Review of Personnel Perform., Emergency Response Program Changes (**1 per yr/15 months**). **Administrative Manual Section B-4.3**	X			

Comments:
Item #49: All sections of the pipeline require immediate response pursuant to IMP 5.1.
Item #50: No facilities abandoned.

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		OPERATION & MAINTENANCE (Cont)	S	U	NA	NC
61.	195.403(c)	Verification of Supervisor Knowledge - Emergency Response Procedures	X			
62.	195.404(a)(1)	Maps or Records of Pipeline System	X			
63.	195.404(a)(2)	Maps/Records of Crossings of Roads, Railroads, Rivers, Utilities and Pipelines	X			
64.	195.404(a)(3)	MOP of each Pipeline	X			
65.	195.404(a)(4)	Pipeline Specifications	X			
66.	195.404(b)(1)	Pump Station Daily Discharge Pressure (maintain for at least 3yrs)	X			
67.	195.404(b)(2)	Abnormal Operations (§195.402) (maintain for at least 3yrs)	X			
68.	195.404(c)(1)	Pipe Repairs (maintain for useful pipe life)	X			
69.	195.404(c)(2)	Repairs to Parts of the System other than pipe (maintain for at least 1 yr)			X	
70.	195.404(c)(3)	Required inspection and test records (maintain 2 yrs or next test/inspection)	X			
71.	195.406(a)	Establishing the MOP	X			
72.	480-75-620	Was MOP changed based on hydrotest?	X			
73.	195.408(b)(2)	Filing and disposition of notices of abnormal or emergency conditions.	X			
74.	195.412(a)	Inspection of the ROW	X			
75.	195.412(b)	Inspection of Underwater Crossings of Navigable Waterways			X	
76.	480-75-640	Depth of cover survey	X			
77.	195.420(b)	Inspection of Mainline Valves	X			
78.	480-75-500	Pipe movement study per API 1117. **Maintenance Manual Section E-15**	X			
79.	195.428(a)	Insp. of Overpress. Safety Devices (**1 per yr/15 months** non-HVL; **2 per yr/7½ months** HVL). **Located at RV's #1412 and #1414.**	X			
80.	195.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE **5 yrs**).			X	
81.	195.428(d)	Inspection of Overfill Systems (**1 per yr/15 months** non-HVL; **2 per yr/7½ months** HVL)			X	
82.	480-75-300 (3)	Leak detection and alarm records. **Long Term Variation at 2,000 gallons and Short Term Variation at 546 gallons per 15 minute (WAC 480-75-300). Operation Manual Section IV, Part A.**	X			
83.	480-75-320	Surge analysis done? **Completed in 1999 at Check Valve location at 571 psig and 0.8854 CF/sec.**	X			
84.	195.430	Inspection of Fire Fighting Equipment	X			
85.	195.432(c)	**Breakout Tanks:** Inspect the physical integrity of in-service steel aboveground breakout tanks built to **API Standard 2510** according to **section 6 of API 510.** Amt. 195-86 Pub. 06/09/06 eff 07/10/06. **Note: For Break-out tank unit inspection, refer to Breakout Tank Form**			X	

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	PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162)		S	U	NA	NC
86.	195.440 (e & f)	**PUBLIC AWARENESS PROGRAM** Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements – Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc), See table below. Operators in existence on June 20, 2005, must have completed their written program no later than June 20, 2006 **API RP 1162 Baseline* Recommended Message Delivery Frequencies** **Stakeholder Audience (Hazardous Liquid Operators** / **Baseline Message Frequency (Starting from Effective Date of Plan)** Residence along right-of-way and Places of Congregation: 2 Years Emergency Officials: Annual Public Officials: 3 Years Excavator and Contractors: Annual One-Call Centers: As required of one-call center * Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, record keeping, program evaluation, etc.	X			
87.	.440(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. Amdt. 195-83 Pub. 5/19/05, eff. 06/20/05.	X			
88.	.440(i)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than **June 20, 2010**. Amdt. 195-83 Pub. 5/19/05, eff. 06/20/05.	X			

Comments:
Item #69: No repairs to the facilities other than pipeline.
Item #75: No navigable underwater pipeline crossings.
Item #80-81: No HVL pipeline or breakout tanks.
Item #85: No breakout tanks.
Item #86: McChord Pipeline has identified the entire pipeline as Class 3 Location and mailed 6,669 letters to residences along the ROW, emergency officials, public officials, excavators (2,495 letters), contractors and the One-Call Center.

	DAMAGE PREVENTION PROGRAM		S	U	NA	NC
89.	195.442(c)(1)	List of Current Excavators	X			
90.	195.442(c)(2)	Notification of Public/Excavators	X			
91.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records)	X			
92.	195.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
93.		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline?	X			
94.		2. In the case of blasting, does the inspection include leakage surveys? (required) **Maintenance Manual Section F-1**	X			
95.		Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? **Administrative Manual Section D-1 (Form 7000-1 and McChord's Field Inspection Report)**	X			

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			S	U	NA	NC
96.	**Damage Prevention (Operator Internal Performance Measures)**					
97.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)	X			
98.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?			X	
99.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?			X	
100.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
101.		Review operator locating and excavation procedures for compliance with state law and regulations.	X			
102.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
103.	**195.507(b)**	Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
104.	**Damage Prevention – Data Gathering Only**					
105.	Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do		Y/N YES			
106.	**Request data for last calendar year**	Number of hazardous liquid-related one-call locate requests completed in the field	12 locates completed in 2009.			
107.		Number of third-party damages incurred	Zero			
108.		Cause of damage, where cause of damage is classified as one of the following:	N/A			
109.		1. Inaccurate locate	Zero			
110.		2. Failure to use reasonable care	Zero			
111.		3. Excavated prior to a locate being conducted; or	Zero			
112.		4. Excavator failed to call for a locate	Zero			

Comments:
Item #98: McChord Pipeline does all locates with their employees and contractors are not used.

			S	U	NA	NC
	CPM Systems					
113.	**195.444**	Each CPM system employed on a pipeline segment should be fully described and the documentation readily available for reference by the users and by those employees responsible for the maintenance and support of the CPM system				
114.		**a.** General Information (this information is usually available as a part of normal Control Center information). **b.** A system map, profile and detailed physical description for each pipeline segment. **c.** A summary of the characteristics of each product transported.	X			
115.		**CPM Specific Information:**				

116.	195.444	a. A tabulation of the inputs used in the CPM procedure for each pipeline segment. b. A general description of the CPM outlining its principles of operation. c. A list of special considerations or step-by-step procedures to be used in evaluating CPM results and for requesting assistance with alarm evaluation, e.g., on-call support phone numbers where this systems is implemented.	X			
117.		d. Details of the expected performance of the leak detection system under normal and line upset conditions; and the effects of system degradation on the leak detection results. e. CPM pipeline controller training manuals or information. f. CPM alarm thresholds for the various applications.	X			

Comments:

	CORROSION CONTROL		S	U	NA	NC
118.	195.555	Supervisors maintain thorough knowledge of corrosion procedures.	X			
119.	195.567	Test Lead Maintenance, frequent enough intervals	X			
120.	480-75-510	Corrosion remediation within 90 days	X			
121.	195.569	Inspection of Exposed Buried Pipelines (External Corrosion)	X			
122.	195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (**1 per yr/15 months**)	X			
123.	195.573(a)(2)	Close Interval surveys (meeting the circumstances determined by the operator)	X			
124.	195.573(b)	External Corrosion Control, Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/39 months**)			X	
125.	195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers			X	
126.	195.573(d)	External Corrosion Control - Bottom of Breakout Tanks			X	
127.	195.573(e)	Corrective actions as required by .401(b) and, if IMP pipeline, 195.452(h).	X			
128.	195.575	Electrical isolation inspection and testing	X			
129.	195.577	Testing for Interference Currents	X			
130.	195.579(a)	Corrosive effect investigation	X			
131.	195579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (**2 per yr/7½ months**)			X	
132.	195.579(c)	Inspection of Removed Pipe for Internal Corrosion	X			
133.	195.583(a)	Atmos. Corr. Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**)	X			
134.	195.585(a)	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG	X			
135.	195.585(b)	Localized Corrosion Pitting – replace, repair, reduce MOP	X			
136.	195.589(a)&(b)	Cathodic Protection (Maps showing anode location, test stations, CP systems, protected pipelines, etc.)	X			

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Comments:

Item #118: McChord Pipeline has retained Jeremy Hailey of NW Corrosion for all CP compliance. McChord's criteria for CP compliance are a minimum -850 mv with the rectifier off.
Item #124: McChord Pipeline has no bare pipelines.
Item #125: The pipeline does not use interference bonds.
Item #126: The system does not have breakout tanks.
Item #131: The pipeline does not use coupons.

	FIELD REVIEW		S	U	N/A	N/C
137.	195.262	Pumping Stations – Adequate Ventilation	X			
138.	195.262	Station Safety Devices	X			
139.	195.308	Pre-pressure Testing Pipe - Marking and Inventory	X			
140.	195.403	Supervisor Knowledge of Emergency Response Procedures	X			
141.	195.410	Right-of-Way Markers	X			
142.	480-75-540	Markers at exposed areas			X	
143.	195.412	ROW/Crossing Under Navigable Waters	X			
144.	195.420	Valve Maintenance	X			
145.	195.420	Valve Protection from Unauthorized Operation and Vandalism	X			
146.	195.426	Scraper and Sphere Facilities and Launchers	X			
147.	195.428	Pressure Limiting Devices	X			
148.	195.428	Relief Valves - Location - Pressure Settings - Maintenance	X			
149.	480-75-320	Relief Device set at or below MOP	X			
150.	195.428	Pressure Controllers	X			

Comments:

Item #142: The pipeline is not exposed along the ROW.

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Standard Inspection Report for Intrastate Hazardous Liquid Systems
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S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		FIELD REVIEW (Cont)	S	U	N/A	N/C
151.	480-75-300	Leak Detection – 8% in 15 Minutes	X			
152.	480-75-300	Leak detection at flow and no flow conditions	X			
153.	195.430	Fire Fighting Equipment	X			
154.	195.432	Breakout Tanks			X	
155.	480-75-330	Do Breakout Tanks have independent overfill alarms?			X	
156.	195.434	Signs - Pumping Stations - Breakout Tanks	X			
157.	195.436	Security - Pumping Stations - Breakout Tanks	X			
158.	195.438	No Smoking Signs	X			
159.	195.501-195.509	**Important:** Per OPS, the OQ Field Inspection Protocol Form 15 shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database located at http://primis.phmsa.dot.gov/oqdb/home **Form Completed? Y N < YES**				
160.	195.571	Cathodic Protection (test station readings, other locations to ensure adequate CP levels)	X			
161.	195.573	Rectifiers, Reverse Current Switches, Diodes, Interference Bonds	X			
162.	195.575	Electrical Isolation; shorted casings			X	
163.	195.583	Atmospheric corrosion - Exposed pipeline components, (splash zones, water spans, soil/air interface, under thermal insulation, disbanded coatings, pipe supports, deck penetrations, etc.)	X			

Comments:

Item #154-155: No breakout tanks in the facilities.
Item #162: No electrical isolation problems identified.
Item # 163: At the McChord Air Base storage facility, the McChord Pipeline aboveground pipe wrapping near the ground interface has sagged and captured moisture with signs of atmospheric corrosion. Also, the pipe supports at the pump station and McChord Air Base has signs of atmospheric corrosion located between the pipe support and the aboveground piping.

Utilities and Transportation Commission
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Oil Pollution Act (49 CFR 194)

		Field Verification of Facility Response Plan Information	Y	N	N/A
164.		Is there a copy of the approved Facility Response Plan present? [See Guidance OPA-1]	X		
165.	194.111	RSPA Tracking Number: **1248** Approval Date: **12-15-2009**			
166.	194.107	Are the names and phone numbers on the notification list in the FRP current?[OPA-2] **Yes, located in Appendix C and Table 3.1**	X		
167.	194.107	Is there written proof of a contract with the primary oil spill removal organization (OSRO)? [OPA-3] **Yes, Appendix E**	X		
168.	194.107	Are **there complete records of the operator's oil spill exercise program? [OPA-4] Yes, the last exercise was Sept. 10, 2009**	X		
169.	194.117	Does the operator maintain records for spill response training (including HAZWOPER training)? [OPA-5] **Yes, Web Tracking.**	X		

Comments *(If any of the above is marked N or N/A, please indicate why, either in this box or in a referenced note):*

OPA Inspection Guidance

OPA-1 - RSPA Tracking Number: This is also known as the "sequence number." It is a four-digit number that PHMSA HQ assigns to each facility response plan (FRP). If the operator does not know their sequence number, they should look on their copy of the FRP for the sequence number. Also, PHMSA HQ always puts the sequence number in every plan-related letter to operators. If the operator is a new operator without a plan, the unit has a new owner, or the unit has new facilities not incorporated into the existing OPA-90 Plan, the answer is NO. Direct the operator to contact L.E. Herrick, 202-366-5523.

Copy of approved FRP: Every oil pipeline operator must have an FRP approved by PHMSA. The operator should be able to produce their PHMSA plan approval letter. When PHMSA HQ approves a plan, the approval is valid for five years from the date of the approval letter.

OPA-2 - Names and phone numbers: Operators are required to keep the notification lists in their FRP current. The inspector should examine the notification list in the FRP and spot-check the accuracy of the names and phone numbers when they interview the operator. It is critical to check the Qualified Individual (QI) and Alternate QI data.

OPA-3 - Proof of OSRO contract: Operators whose FRP's state that they are relying on clean-up contractors for spill response are required to have contracts with the oil spill removal organizations (OSRO's) that they cite in the FRP. The inspector should ask to see documentation that the operator has a contract in place with the primary OSRO listed in the FRP.

OPA-4 - Exercise documentation: Operators are required to conduct a variety of spill response exercises under Part 194, and make their exercise records available to PHMSA for inspection. Inspectors should check to see if the operator lists the date, time, location and names of exercise participants. If the inspector has doubts about whether the operator's exercise documentation is accurate, it should be noted on the inspection form so that PHMSA HQ can follow up with the operator. The documentation should include annual spill management team tabletop exercises, quarterly internal notification drills, and annual response equipment deployment drills? The drill does not necessarily need to include a pipeline spill scenario, but should test the operator's personnel, equipment, resources, and response strategies

needed for responding to a comparable pipeline spill.

OPA-5 - Training records: Operators are required to train their personnel to carry out their individual roles under the FRP. The inspector should spot-check the files of key personnel listed in the FRP to ensure that they have been trained to carry out their duties in a response. Special attention should be given to documenting the safety training required under OSHA's Hazwoper standard (29 CFR 1910.120). Each person involved in a spill response is required under 194.117 to have training commensurate with their duties.

Recent PHMSA Advisory Bulletins (Last 2 years)

Leave this list with the operator.

Number	Date	Subject
ADB-08-05	June 25, 2008	Pipeline Safety - Notice to Hazardous Liquid Pipeline Operators of Request for Voluntary Adv Notification of Intent To Transport Biofuels
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-01	Jan 26, 2010	Pipeline Safety: Leak Detection on Hazardous Liquid Pipelines
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

For more PHMSA Advisory Bulletins, go to http://ops.dot.gov/regs/advise.