A completed **Standard Inspection Report** is to be submitted to the Director within 60 days from completion of the inspection. A **Post Inspection Memorandum (PIM)** is to be completed and submitted to the Director within 30 days from the completion of the inspection, or series of inspections, and is to be filed as part of the **Standard Inspection Report**.

Inspe	ction Report	Post Inspec	tion Memorandum
Inspector/Submit Date:	Kuang Chu / 10/15/2009	Sr. Eng Review Date: Peer Review/Date: Director Approval/Date:	David Lykken / 11/2/2009

	POST INSPECTION MEMORANDUM	(PIM)	
Name of Operator:	Kinder Morgan Canada, Inc.	OPI	D #: 19585
Name of Unit(s):	Trans Mountain Pipeline (Puget Sound) LLC	Unit	# (s): 285
Records Location:	Laurel Station		
Unit Type & Commodity:	Hazardous liquid pipeline for crude oil transportation		
Inspection Type:	Standard	Inspection Date(s)	9/21 - 25/2009
PHMSA Representative(s):	Kuang Chu/UTC	,	AFO Days: 5

Summary:

The breakout tank inspection is part of the standard inspection of the pipeline system. Tanks T-170 and T-180 were refurbished in 2008 as part of the expansion at the Laurel Station. Tank T-130 at Ferndale Station was built in 2008 for surge relief. Tank T-7 inside the Shell refinery at Anacortes is an old tank and the transfer of ownership from Shell to Kinder Morgan is almost complete. This tank was refurbished in 2008.

Findings:

§195.432 Breakout tanks.

(b) Each operator shall inspect the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks according to section 4 of API Standard 653. However, if structural conditions prevent access to the tank bottom, the bottom integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3).

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4.3.1 Routine In-Service Inspections

4.3.1.3 This routine in-service inspection shall include a visual inspection of the tank's exterior surfaces. Evidence of leaks; shell distortions; signs of settlement; corrosion; and condition of the foundation, paint coatings, insulation systems, and appurtenances should be documented for follow-up action by an authorized inspector.

During the field inspection it was noticed that there were two probable violations as follows:

1. The mastic along the external chime area has deteriorated. This allowed the water to get under the chime to create corrosion on the chime.

2. The drainage around the tank and inside the dike area was uneven which allowed the rain water to collect on one side of the tank. Depending on the water level, the chime could be submerged in water during rainy season.

Name of Operator: Kin	der Morgan C	anada, Inc.			
OP ID No. ⁽¹⁾ 19585			Unit ID No. ⁽¹⁾	285	
H.Q. Address: Suite 2700, Stock Exchange Building 300 5 th Ave. SW Calgary, Alberta T2P5J2 Canada			System/Unit Name & Address: Trans Mountain Pipeline (Puget Sound) LLC Laurel Station 1009 East Smith Road Bellingham, WA 98226		
Co. Official:	Engineering &		Activity Record	1 ID#:	
Phone No.:	(403)-514-640	0/(800)-535-7219	Phone No.:	(360)-398-1541	
Fax No.:	(403)-514-644	1	Fax No.:	(360)-398-7432	
Emergency Phone No.:	1-888-876-671	1	Emergency Pho	one No.: 1-888-876-6711	
Persons Interview	wed	Titles		Phone No.	
Patrick Davis		Supervisor, Corporation		(360)-398-1541	
Terry Delong		Manager, Integrity Progra Engineering	am & Risk	(403)-514-6517	
Adam Lind		Operations Engineer/Tec	hnical Services	(604)-268-3056	
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PHMSA Representatives (1)	: Kuang Chu/U	TC	Inspection Date	es ⁽¹⁾ : 9/21 - 25/2009	
Company System Maps (co	pies for Region	Files):	: •		

Comments:

The breakout tanks were generally in good working condition except for T-7 inside Shell refinery in Anacortes. The transfer of ownership from Shell to Kinder Morgan for T-7 has been going on for a number of years. During the inspection, the operator indicated that they were at the final phase of the negotiation between attorneys of both companies. The latest API 653 internal inspection was conducted in 2005. Some repairs and improvements were made in 2008. There are additional improvements need to be implemented to bring the tank to full compliance.

For hazardous liquid operator inspections, the attached evaluation form should be used in conjunction with 49 CFR 195 during PHMSA inspections.

¹ Information not required if included on page 1.

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TANK DATA

		1	2	3	4	5	6
(A)	FACILITY NAME	Laurel	Laurel	Anacortes	Ferndale		
(B)	TANK #	170	180	7	130		
(C)	CONSTRUCTION DATE / API STANDARD	1972	1972	1958	2008		
(D)	CONST. TYPE	Field constructed	Field constructed	Field constructed	Field constructed		
(E)	CAPACITY (BBL)	100,000	100,000	3,000	3,000		
(F)	INTERNAL LINING? (Y/N)	Yes (floor)	Yes (floor)	None	Yes		
(G)	HT.(FT)	48	48	24	24		
(H)	MAX. FILL HT. (FT)	42	42	Normally empty	Normally empty		· ·
(1)	DIA (FT)	120	120	30	30		
(J)	ROOF TYPE	Dome with internal floater	Dome with internal floater	Fixed cone	Fixed cone		
(K)	PRODUCTS	crude oil	crude oil	crude oil	crude oil		
(L)	TYPE OF VOLUMETRIC ALARMS (note1)	Rader, displacement switches	Rader, displacement switches	Tank gage (will install rader, displacement switches later)	Rader, displacement switches		
(M)	DIKE VOLUME (BBL)	126,733	110,433	greater than 3,300	3,400		
(N)	DATE INTERNAL INSPECTION	2008	2008	2005	constructed in 2008		
(0)	DATE REPAIRED & TYPE & REASON FOR REPAIR	2008	2008	2005/2008 per API 653 inspection report	N/A		
(P)	DATE API 653 APPLIED	2008	2008	2005	2008		
(Q)	CP Type & Anode Type	Cast iron anodes	Cast iron anodes	None (under review)	Ribbon anodes		
(R)	C P Monitoring (does tank have fixed reference cells under floor, or is CP monitored around circ. of shell)	Around circumference of shell	Around circumference of shell	None	Under floor		
(S)	Year of Next Internal Inspection	2028	2028	2018	2020		
(T)	Internal Inspection Interval	20 years	20 years	13 years	12 years		
(U)	Internal Inspection Interval Based Upon (is the interval from calculated corrosion rate or using max API allowed. If Corrosion Rate,	Max allowed using corrosion rate calculation from most recent API 653 internal inspection	Max allowed using corrosion rate calculation from most recent API 653 internal inspection	Based on corrosion rate for uncoated bottom	Per API 653 initial internal inspection interval for tank with soil-side CP		

	what is rate?)					
(V)	Date of Next External Inspection	2013	2013	2010	2013	
(₩)	External Inspection Interval Based Upon (is the interval from calculated corrosion rate or using max API allowed. If Corrosion Rate, what is rate?)		Max API allowed	Max API allowed	Max API allowed	
(X)	Date of Next U.T. Inspection	2013	2013	2010	2013	
(Y)	Shell U. T. Inspection Interval	5 years	5 years	5 years	5 years	
(Z)	U. T. Inspection Interval Based Upon (is the interval from calculated corrosion rate or using max API allowed. If Corrosion Rate, what is rate?)	With next API 653 in- service inspection			With next API 653 in-service inspection	

(J): (K): (EF) External Floater; (IF) Internal Floater; (F) Fixed

(R) Refined; (C) Crude; (H) Highly Volatile Liquid; (O) Other (H) High; (HH) High-High; (O) Overfill; (OTH) Other

(L):

(N): Most Recent Date

Most Recent Date (O):

(Q):

(A) Anodic; (R) Rectified - if rectified, explain type of anode system, MMO grid, bored crowsfoot w/ coke breeze, anodeflex, etc. (N) None - Document why not needed.

Comments:

Field Verification of Facility Response Plan Information Y Ν N/A Х Is there a copy of the approved Facility Response Plan present? 194.111 10/30/2007 **RSPA** Tracking Number: 587 Approval Date: 194.107 Are the names and phone numbers on the notification list in the FRP current? Х 194.107 Is there written proof of a contract with the primary oil spill removal organization (OSRO)? Х Х 194.107 Are there complete records of the operator's oil spill exercise program? 194.117 Does the operator maintain records for spill response training (including Hazwoper training)? Х

Do any of the Breakout Tanks have a history of corrosion underneath the tank bottoms? (Notes: T-7 had under side corrosion on tank bottom.)	X Yes	No	
If yes, has the operator calculated corrosion rates based on			
information from an API 653 internal inspection report?	X Yes	No	

BREAKOUT TAN	K INSPECTION I	FORM	
Since last inspection, has there been any change of physical condition or service of the tank(s)? (Notes: Both T-170 & 180	have been reactivated.)	X Yes	No
If so, has there been any evaluation to determine the suitability continued use?	for the second sec	X Yes	No
Type of leak detection system the operator utilizes. If leak det (Notes: Agar probe detects oil on water in the sump of each to they are alerted to any unplanned level changes).			ns on the tanks so that
Is there a valve on the inlet and outlet line of the tank area so c area from the other facilities (§195.258(a) & §195.260(b))?	one can isolate the tank	XYes	No
in proper operating condition; X Y plainly marked; X Y	Yes No Yes No Yes No Yes No		
§195.434 - Are signs around each breakout tank area visible to include the name of the operator and an emergency telephone		X Yes	No
§195.436 & §195.264(c) - Is there protection for each breakou and unauthorized entry?	t tank area from vandalism	X Yes	No

Form 10 Breakout Tank Inspection Form (Rev. 03/23/09 through Final Rule of 16 January 2009)

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	Subpart F - Operations & Maintenance	S	\mathbf{U}	N/A	N/C
§195.402(a)	General O&M Requirement: Each operator must prepare and follow for each pipeline system (including breakout tanks) a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies			· · ·	
	Does the operator have written procedures for Breakout tanks? (Procedures must address operations, maintenance, repair, emergency, and abnormal operations.)	x			
195.404(a)(1)(i)	Maps: Are maps and records maintained showing the location and identification of the following;			ta et sa	
	1. Breakout tanks (capacity, other information)	X			
	2. Pipeline valves (tank isolation valves, manifold valves, emergency valves)	X			
	3. Cathodically protected tanks and associated facilities	X			
	4. Overpressure and overfill safety devices (as required under 195.428)	X			

§195.402(a)	Protect	ion against Ignition and Safe Access/Egress Involving Floating Roofs		u de la composición d	
§195.402(c)(3)	405(a).	Protection against Ignition (After October 2, 2000) Protection against Ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities involving aboveground breakout tanks must be in accordance with API Recommended Practice 2003 (Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents). Not required if operator notes in procedures why compliance with API 2003 is not necessary for tank safety). (Refer to Subsection 4.5, Subsection 4.6, Subsection 5.4, Subsection 5.5, and Subsection 6.3 of API RP 2003)	x		
	405(b).	Safe Access/Egress Involving Floating Roofs (After October 2, 2000) The operator must review and consider the potentially hazardous conditions, safety practices and procedures with respect to access/egress onto floating roofs of in-service aboveground breakout tanks to perform inspection, service, maintenance or repair activities in API Publication 2026 (Safe Access/Egress Involving Floating Roofs Of Storage Tanks In Petroleum Service) for inclusion in the procedure manual (Sec. 195.402(c).			 i avi - a
		Has the operator reviewed and considered the potentially hazardous conditions, safety practices and procedures outlined in API 2026 (Safe Access/Egress Involving Floating Roofs Of Storage Tanks In Petroleum Service) for inclusion in the operator's procedure manual? <i>Review for documentation that this has been done.</i>	x		

§195.402(a)		External Corrosion Control	S	U	N/A	N/C
§195.402(c)(3)	.563(d)	Breakout tank areas, bare pipelines, and buried pumping station piping must have cathodic protection in places where previous editions of this part required cathodic protection as a result of electrical inspections.	' x			

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§195.402(a)		External Corrosion Control	S	U	N/A	N/C
	.565	Breakout Tank CP installation Does operator install (after 10/2/00) required cathodic protection systems to protect above ground breakout tanks over 500 bbl capacity, in accordance with API RP 651? (Not required if operator notes in the corrosion control procedures why compliance with API 651 is not necessary for tank safety).	X			
	.571	Cathodic Protection Acceptance Criteria Cathodic protection levels must comply with the applicable criteria outlined in NACE Standard RP0169-96 (paragraphs 6.2 and 6.3)	x			
	.573(d)	Breakout Tank CP inspections				
		Cathodic protection systems used to protect breakout tanks must be inspected in accordance with API 651.	x			
		(Not required if operator notes in the corrosion control procedures why compliance with API 651 is not necessary for tank safety).				
	11.3.2	Cathodic Protection Surveys – Annual CP surveys are required. Surveys may include one or more of the following:				
		1. Structure to soil potential.	<u>x</u>			
		2. Anode current.	X			
		3. Native structure to soil potentials	X			
		4. Structure-to-structure potential	X			
		5. Piping-to-tank isolation if protected separately. (Notes: There is no isolation.)			X	
		6. Structure-to-soil potential on adjacent structures. (Notes: There are no adjacent structures.)			x	
		7. Continuity of structures if protected as a single structure.	X			
		8. Rectifier DC volts, DC amps, efficiency, and tap settings.	X			
		Rectifier Inspections:			ener de la La composition	·
		<u>- every 2 months</u> . – (Inspections should include a check for electrical shorts, ground connections, meter accuracy, and circuit resistance).	x			
		<u>- Annual inspection</u> (Inspections should include a check for electrical shorts, ground connections, meter accuracy, efficiency, and circuit resistance).	x			
	11.3.3.3	Insulator, bonds, isolating devices – Must be done periodically. May be done by on- site inspection or evaluating corrosion test data.	X			
	11.3.3.4	Tank Bottoms – Tank bottom should be examined for evidence of corrosion whenever access to the bottom is possible. (During repairs, modifications, during API653 inspections) Examinations may be done by coupon cutouts or nondestructive methods.	x			
	.577(a)	Interference Currents For breakout tanks exposed to stray currents, is there a program to minimize the detrimental effects? (Notes: There are no stray currents.)			x	
	.579(d)	Breakout tank – internal corrosion mitigation After October 2, 2000, tank bottom linings installed in tanks built to API 12F (Specification for Shop Welded Tanks for Storage of Production Liquids), API 620 (Design, Construction, Large, Welded, Low-Pressure Storage Tanks), API 650 (Welded Steel Tanks for Oil Storage), or its predecessor 12C must be installed in accordance with API RP 652. Not required if operator notes in the corrosion control procedures why compliance with API 652 is not necessary for tank safety. (Notes: The operator's manual was revised to include this requirement after the inspection.)	x			

7 Form 10 Breakout Tank Inspection Form (Rev. 03/23/09 through Final Rule of 16 January, 2009)

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§195.402(a)		Tank Repairs, Alterations, and Reconstruction Procedures		<u>.</u>
§195.402(c)(3) §195.422	.205(a)	Aboveground breakout tanks repaired, altered, or reconstructed and returned to service must be capable of withstanding the internal pressure produced by the hazardous liquid to be stored therein and any anticipated external loads. The repair/alteration history includes all data accumulated on a tank from the time of its construction with regard to repairs, alterations, replacements, and service changes (recorded with service conditions such as stored product temperature and pressure).	x	
F	.205(b)	These records should include the results of any experiences with coatings and linings. After Oct. 2, 2000 compliance with paragraph (a) above requires:		
		(1) Tanks designed for approximately atmospheric pressure, constructed of carbon and low alloy steel, welded or riveted, and non-refrigerated built to API Standard 650 (Welded Steel Tanks for Oil Storage) must be repaired, altered, or reconstructed according to API Standard 653. The basis for repairs and alterations shall be an API Standard 650 equivalence	x	
-		 (2) Tanks built to API Specification 12F (Specification for Shop Welded Tanks for Storage of Production Liquids) or API Standard 620 (Design, Construction, Large, Welded, Low-Pressure Storage Tanks), the repair, alteration, and reconstruction must be in accordance with the design, welding, examination, and material requirements of those respective standards. Tanks built to API 620 may be modified by the design, welding examination and testing provisions of API 653 in proper conformance with the stresses, joint efficiencies, material and other provisions in API standard 620. (Notes: The operator does not have API 620 tanks.) 		x
		(3) For high pressure tanks built to API Standards 2510 (Design and Construction of LPG Installations), repaired, altered, or reconstructed will be in accordance with API 510 (Pressure Vessel Inspection Code). <i>(Notes: The operator does not have API 2510 tanks.)</i>		x
	.422	Are repairs made in a safe manner and are made so as to prevent damage to persons or property?	x	

Comments:

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Iı	npoundment, Protection Against Entry, Relief, and Venting Procedures- Aboveground Breakout Tanks	S	U	N/A	N/C
	264(a) A means must be provided for containing hazardous liquids in the event of spillage or failure of an aboveground breakout tank. Containment and impoundment are effective means of controlling environmental releases and fires.	x	•		
	 (1) For tanks built to API Specification 12F (Specification for Shop Welded Tanks for Storage of Production Liquids), API Standard 620 (Design, Construction, Large, Welded, Low-Pressure Storage Tanks), and others (such as API Standard 650 or its predecessor Standard 12C), the installation of impoundment must be in accordance with the following sections of NFPA 30 (Flammable and Combustible Liquids Code): (Notes: This requirement was added to operator's manual after the inspection.) 			• •	
	(i) Impoundment around a breakout tank must be installed in accordance with Section 3.2.3.2; and	x			
	(ii) Impoundment by drainage to a remote impounding area must be installed in accordance with Section 4.3.2.3.1. (Notes: The operator does not use remote)			x	
	impoundment.)				
	(2) For tanks built to API Standard 2510, the installation of impoundment must be in accordance with Section 5 or 11 of API Standard 2510. (Design and Construction of LPG Installations): (Notes: The operator does not have API 2510 tanks.)	****			
	Refer to Section 5 API Standard 2510 - Siting Requirements and Spill Containment 5.1 Siting 5.2 Drainage 5.3 Spill Containment 5.4 Remote Impoundment			x	
	5.5 Diking Section 11 - Refrigerated Storage 11.3 Siting Requirements 11.3.1 Minimum Distance Requirements for Refrigerated LPG Tanks 11.3.2 Siting of Refrigerated LPG Tanks 11.3.3 Spill Containment 11.3.4 Remote Impoundment 11.3.5 Diking				
	264(d) Normal/emergency relief venting must be provided for each atmospheric pressure breakout tank. Pressure/vacuum-relieving devices must be provided for each low-pressure and high-pressure breakout tank.				
	Two basic types of pressure or vacuum vents, direct-acting vent valves and pilot- operated vent valves, are available to provide overpressure or vacuum protection for low-pressure storage tanks. Direct-acting vent valves may be weight loaded or spring loaded. Another type of venting device, an open vent, is available to provide overpressure or vacuum protection for storage tanks designed to operate at atmospheric pressure. An open vent is always open. It allows a tank designed to operate at atmospheric pressure to inbreathe and outbreathe at any pressure differential.	х			
	264(e) For normal/emergency relief venting and pressure/vacuum-relieving devices installed on aboveground breakout tanks after October 2, 2000, compliance with paragraph (d) of this section requires the following for the tanks specified:				
	 (1) Normal/emergency relief venting installed on atmospheric pressure tanks built to API Specification 12F (Specification for Shop Welded Tanks for Storage of Production Liquids) must be in accordance with Section 4, and Appendices B and C, of API Specification 12F (Specification for Shop Welded Tanks for Storage of Production Liquids). 4 - Venting Requirements 4.1 Normal Venting 4.2 Emergency Venting Appendix B - Recommended Practice for Normal Venting Appendix C - Recommended Relieving Capacities 			x	

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Impoundment, Protection Against Entry, Relief, and Venting Procedures- Aboveground Breakout Tanks	S	U	N/A	N/C
(2) Normal/emergency relief venting installed on atmospheric pressure tanks (such as those built to API Standard 650 or its predecessor Standard 12C) must be in accordance with API Standard 2000. (Venting Atmospheric and Low- Pressure Storage Tanks Nonrefrigerated and Refrigerated)	x			
 (3) Pressure-relieving and emergency vacuum-relieving devices installed on low pressure tanks built to API Standard 620 (Design, Construction, Large, Welded, Low-Pressure Storage Tanks) must be in accordance with Section 9 of API Standard 620 and its references to the normal and emergency venting requirements in API Standard 2000. (Notes: The operator does not have API 620 tanks.) Section 9 - Pressure- and Vacuum-Relieving Devices 9.1 Scope 9.2 Pressure Limits 9.3 Construction of Devices 9.4 Means of Venting 9.5 Liquid Relief Valves 9.6 Marking 9.7 Pressure Setting of Safety Devices 			x	
 (4) Pressure and vacuum-relieving devices installed on high pressure tanks built to API Standard 2510 (Design and Construction of LPG Installations): must be in accordance with Sections 7 or 11 of API Standard 2510. Section 7 - Tank Accessories, Including Pressure and Vacuum-Relieving 7.1 Mandatory Equipment 7.2 Tank Accessory Materials Section 11 - Refrigerated Storage (Notes: The operator does not have API 2510 tanks.) 			x	

§195.402(a)		Overpressure Safety Devices Procedures	S	U	N/A	N/C
§195.402(c)(3)	.428(a)	Inspect and test each pressure limiting device, relief valve, pressure regulator, or other pressure control equipment. (Annually/15 mo)	x			
	.428(c)	 Aboveground breakout tanks constructed or significantly altered according to section 5.1.2 of API Standard 2510 (Design and Construction of LPG Installations) after October 2, 2000 must have an overfill protection system according to 5.1.2 of API Standard 2510. if (600 gallons or more) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 (Overfill Protection for Storage Tanks in a Petroleum Facility). (Not required if operator notes in procedures why compliance with API RP 2350 is not necessary for tank safety). For Unattended Facilities (for definition, see API RP 2350, paragraph 1.3.1), Section 2. For Attended Facilities (for definition, see API RP 2350, paragraph 1.3.1), Section 3 and for all facilities, transfer procedures need to be per Section 4. 	x			
	.428(d)	After October 2, 2000, paragraphs (a) and (b) of §195.428 also applies for the inspection and testing of pressure control equipment and to the testing of overfill protection systems. Subsection 4.8 of API RP 2350.	X			

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§195.402(a)		In-service Breakout Tank Inspection Procedures	S	U	N/A	N/C
§195.402(c)(3)	.432(a)	Inspection Intervals (In-service tank): Inspection of in-service breakout tanks. (annually/15mo) includes anhydrous ammonia and any other breakout tank that is not inspected per 432 (b) & (c); (Reference 195.1)	x			
		.432(b) Each operator shall inspect the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks according to section 6 of API Standard 653. However, if structural conditions prevent access to the tank bottom, the bottom integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3). <i>Refer to API 653 Section 6.3.1; 6.3.1.1; 6.3.1.2; 6.3.1.3; 6.3.2; 6.3.2.1; 6.3.2.2; 6.3.2.3; 6.3.3.2; & 6.3.3.3</i>	x			
	6.4.2.2	When corrosion rates are not known and similar service experience is not available to determine the bottom plate minimum thickness at the next inspection, the actual bottom thickness shall be determined by inspection(s) within the next 10 years of tank operation to establish corrosion rates. Refer to API 653 Section 6.4; 6.4.2; 6.4.2.1; 6.4.2.2; 6.4.3; & 6.5	x			
T	.432(c)	Each operator shall inspect the physical integrity of in-service steel aboveground breakout tanks built to API Standard 2510 according to section 6 of API 510. (Notes: The operator does not have API 2510 tanks.)			x	
	.432(d)	 The intervals of inspection referenced in paragraphs (b) and (c) begin on May 3, 1999, or on the operator's last recorded date of the inspection, whichever is earlier. For API 12F (Specification for Shop Welded Tanks for Storage of Production Liquids), or its predecessor 12C, 650, and 620 tanks, the "clock" starts at the earliest of: May 3, 1999, Last record date of the inspection (annual), or Whenever API Std 653 program was established for the particular tank. 	x			

Comments:

§195.402(a)	Pressu	re Test Procedures/Pressure Testing Aboveground Breakout Tanks	
	.307(a)	Aboveground breakout tanks built to API Specification 12F (Specification for Shop Welded Tanks for Storage of Production Liquids) and first placed in service after October 2, 2000, pneumatic testing must be in accordance with section 5.3 of API Specification 12F. (Notes: The operator does not have API 12F tanks.)	x
	.307(b)	Aboveground breakout tanks built to API Standard 620 (Design, Construction, Large Welded Low Pressure Storage Tanks) and first placed in service after October 2, 2000, hydrostatic and pneumatic testing must be in accordance with section 7.18 of API Standard 620. (Notes: The operator does not have API 620 tanks.)	x

§195.402(a)	Pressu	re Test Procedures/Pressure Testing Aboveground Breakout Tanks			
	.307(c)	Aboveground breakout tanks built to API Standard 650 (Welded Steel Tanks For Oil Storage) and first placed in service after October 2, 2000, hydrostatic and pneumatic testing must be in accordance with section 5.3 of API Standard 650.	x		
	.307(d)	Aboveground atmospheric pressure breakout tanks constructed of carbon and low alloy steel, welded or riveted, and non-refrigerated and tanks built to API Standard 650 Welded Steel Tanks For Oil Storage) or its predecessor Standard 12C that are returned to service after October 2, 2000, the necessity for the hydrostatic testing of repair, alteration, and reconstruction is covered in section 12.3 of API Standard 653.	х		
	.307(e)	Aboveground breakout tanks built to API Standard 2510 (Design and Construction of LPG Installations) and first placed in service after October 2, 2000, pressure testing must be in accordance with ASME Boiler and Pressure Vessel Code, Section VIII, Division 1 or 2. (Notes: The operator does not have API 2510 tanks.)		x	

· .	. 1	PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162)	S	U	N/A	N/C
.402(a)	.440	Public Awareness Program also in accordance with API RP 1162.		1. T		
	.440(d)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:			•	
		(1) Use of a one-call notification system prior to excavation and other damage prevention activities;	х			
		(2) Possible hazards associated with unintended releases from a hazardous liquids or carbon dioxide pipeline facility;	x			
	-	(3) Physical indications of a possible release;	X			
		(4) Steps to be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; and	x			
		(5) Procedures to report such an event (to the operator).	Х			
	.440(e)	The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.	X			
	.440(f)	The operator's program and the media used must be comprehensive enough to reach all areas in which the operator transports hazardous liquid or carbon dioxide.	х			
	.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.	х			

	PAF	T 195 - FIELD REVIEW ·	S	U	N/A	N/C
195.565/API651	Cathodic Protection Syste	X				
§195.581	Atmospheric Corrosion (1)	lotes: Tank T-7 has atmospheric corrosion on the chime.)		X		
§195.428	Pressure Limiting Device	, relief valve, pressure regulator, overfill protection systems.	X			
§195.432	Breakout Tanks (Refer to	App. C in API 653, In-Service Inspection Checklist)				· .
	C.1.1.1 Concrete Ring:	a. Broken concrete, spalling, and cracks, particularly under backup bars used in welding butt welded annular rings under the shell.	x			
		 Drainage openings in ring, back of waterdraw basins, and top surface of ring indicating bottom leakage. 	x			
		c. Cavities under foundation and vegetation against bottom of tank.	X			
		d. Runoff rainwater from the shell drains away from tank. <u>(Notes:</u> <u>Tank T-7 cannot meet this requirement at its current condition.)</u>		X		
		e. Settlement around perimeter of tank and ringwall.	X			

	PAI	T 195 - FIELD REVIEW	S	U	N/A	N
<u></u>	C.1.1.2 Asphalt:	a. Settling of tank into asphalt base which could direct runoff rain under the tank instead of away from it. <u>(Notes: The tanks are on concrete ringwall.)</u>			x	
		 Areas where leaching of oil out of the asphalt has left rock filler exposed, indicating hydrocarbon leakage. <u>(Notes: The tanks are</u> <u>on concrete ringwall.)</u> 			x	
	C.1.1.1 Site Drainage:	a. Drainage is away from the tank, associated piping, and manifolds. (Notes: Tank T-7 cannot meet this requirement at its current condition.)		x		
		b. Dike drains are operational.	X			L
	C.1.1.6 Housekeeping	Area is void of trash buildup, vegetation, and other inflammables.	X	ļ		
	C.1.2.1 External Visual Inspection:	a. Exterior paint failure, pitting, and corrosion.	x			
		b. Corrosion and thinning on plate and weld in bottom angle area.	X			L
		 c. Integrity of the bottom-to-foundation seal, if present. <u>(Notes: The</u> <u>mastic for T-7 had failed.)</u> 		x		
		d. Any shell deformation.	X		ļ	
	C.1.2.3 Riveted Shell Inspection:	Rivet and seam leakage.	x			
	C.1.3.1 Manways and Nozzles	a. Presence of cracks or signs of leakage on weld joints at nozzles, manways, and reinforcing plates.	x			
	а	b. Shell plate dimpling around nozzles, caused by excessive pipe deflection.	x			
		c. Flange leaks and leaks around flange bolts.	X		ļ	ļ
		 Insulation seals around manways and nozzles. <u>(Notes: There is no</u> <u>insulation.)</u> 			x	
		e. Inadequate manway flange and cover thickness on mixer manways. (Notes: There are no mixers.)			x	
	C.1.3.2 Tank Piping Manifolds:	a. Manifold piping, flanges, and valves leakage.	x			
		b. Fire fighting system components.	X			
		c. Anchored piping which would cause tank shell bottom connection damage during earth movement.	x			
		d. Adequate thermal pressure relief of piping to the tank.	X			
		e. Operating and functional regulator (tanks with purge gas systems). (Notes: There is no regulator.)			x	
		f. Connections are leak free and valves operate properly.	X			
		g. Temperature indicators are accurate and undamaged.	X			
		 Welds on shell-mounted davit clips above valves 6 inches and larger. (Notes: There are no davit clips.) 			x	
§195.432		App. C in API 653, In-Service Inspection Checklist) (cont.)				
	C.1.3.3 Autogauge System:	a. Autogauge tape guide and lower sheave housing (floating swings) show no signs of leaks. <u>(Notes: The tanks do not use autogage</u> <u>tape.)</u>			х	
		 b. History of tape hanging up during tank roof movement (floating roof tanks). <u>(Notes: The tanks do not use autogauge tape.)</u> 			x	
		 Condition of board and legibility of board-type autogauges. (Notes: The tanks do not use board-type autogauge.) 			х	
	C.1.3.4 Shell- Mounted Sample Station:	 a. Sample line and return-to-tank line valves, seals, and drains function properly. <u>(Notes: There are no shell-mounted sample</u> <u>stations.)</u> 			x	
		 b. Circulation pump has no signs of leaks or operating problems. (Notes: There are no shell-mounted sample stations.) 			x	
	C.1.3.5 Heater (Shell Manway Mounted):	Oil is not present at condensate drain (would indicate leakage). (Notes: There are no heaters.)			х	

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	PAI	RT 195 - FIELD REVIEW	S	U	N/A	N/C
	C.1.3.6 Mixer:	 Mounting flange is properly supported. <u>(Notes: There are no</u> <u>mixers.)</u> 			x	
		b. Signs of leakage. (Notes: There are no mixers.)			X	
.501509	Operator Qualification - Form	Use PHMSA Form 15 Operator Qualification Field Inspection Protocol	x			

Comments:

	PART 195 - RECORDS REVIEW	S	U	N/A	N/C
§195.402(c)(1) §195.404(c)(2)§ 195.205(a)&(b)	Tank alteration and reconstruction records. For tanks repaired after 10/2/2000, records reflecting compliance with the referenced API standards. (Maintain for at least 1 year)	x			
§195.402(c)(1) §195.264 (a)&(b)	Impoundment determination records. For tanks constructed after October 2, 2000, records reflecting compliance with the referenced API/NFPA standards.	x			
§195.402(c)(1) §195.264(d)	Record of calculations for normal/relief vents and pressure/vacuum vents.				
§195.310	For tanks first placed in service after 10/2/2000,				·
§195.307	Hydrostatic/pneumatic testing records for above ground breakout tanks.				
	 Built according to API 12F, testing according to Sect. 5.3 of API 12F. <u>(Notes:</u> <u>There are no API 12F tanks.)</u> 			x	
	 Built according to API 620, testing according to Sect. 7.18 of API 620 <u>(Notes:</u> There are no API 620 tanks.) 			x	
	 Built according to API 650, testing according to Sect. 5.3 of API 650. 	X			
	 Repaired/altered/reconstructed according to API 2510, testing according to Sect. 5.3 of API 650. <u>(Notes: There are no API 2510 tanks.)</u> 			x	
	 Built according to API 2510, testing according to ASME Boiler and Pressure Vessel Code, section VIII, Division 1 or 2. (Notes: There are no API 2510 tanks.) 			x	
§195.589(a)(2) & (b)	Tank cathodic protection facilities including galvanic anodes installed after January 29, 2002 (maintain current records or maps).	x			
§195.589(a)(3)	Nearby structures bonded to tank cp system (maintain current records or maps). <u>(Notes: There are</u> no nearby structure bonds.)			X	
§195.589(c)	Each tank corrosion control survey, inspection, test, etc. demonstrating adequacy, according to 195.573(d) and API RP 651 (maintain for at least 5 years).	x			
§195.404(c)(3)	§195.432(b) - Breakout tanks external and internal inspection according to Section 6 of API 653. (Maintain for longer than 2 years or until next inspection/test)	x			
§195.404(c)(3)	§195.432(c) - Breakout tanks (built according to API Standard 2510) external and internal inspection according to Section 6 of API 510 (maintain for longer than 2 years or until next inspection/test). (Notes: There are no API 2510 tanks.)			x	<u></u>

Comments:

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	PUBLIC AWARENESS PROGRAM			
.440(e & f)	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.		x	
	API RP 1162 Baseline* Recommended Message			
	Stakeholder Audience (Hazardous Liquid Operators)	Baseline Message Frequency (starting from elective date of Plan)		
	Residents 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, includin recommendations, supplemental requirements, recordkeeping			
.440(g)	The program must be conducted in English and any other langua significant number of the population in the operator's area.	ges commonly understood by a	x	

Part 199	DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES	S	U	N/A	N/C	
Subparts A - C	Drug & Alcohol Testing & Alcohol Misuse Prevention Program – Use PHMSA Form # 13, PHMSA 2008 Drug and Alcohol Program Check.					

Recent Applicable PHMSA Advisory Bulletins (Last 2 years)

Leave this list with the operator.

<u>Number</u>	Date	<u>Subject</u>
ADB-07-01	April 27, 2007	Pipeline Safety: Senior Executive Signature and Certification of Integrity Management Program Performance Reports
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-08-06	July 2, 2008	Pipeline Safety - Dynamic Riser Inspection, Maintenance, and Monitoring Records on Offshore Floating Facilities

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

Form 10 Breakout Tank Inspection Form (Rev. 03/23/09 through Final Rule of 16 January 2009)

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