

**OPERATOR QUALIFICATION
FIELD INSPECTION PROTOCOL FORM**

| | |
|--|------------------------------|
| Inspection Date(s): | 8/6/2009 |
| Name of Operator and OPID: | Inland Empire Paper Company, |
| Inspection Location(s): | Spokane WA |
| Supervisor(s) Contacted: | Kevin Davis and Doug Krapas |
| # Qualified Employees Observed: | 2 |
| # Qualified Contractors Observed: | 1 |

| Individual Observed | Title/Organization | Phone Number | Email Address |
|----------------------------|---------------------------|---------------------|----------------------|
| Kevin Davis | Superintendent | 509-467-3911 | |
| Ray Allen | Consultant | 509-467-3911 | |
| John Pierce | IEP Tech | 509-467-3911 | |
| | | | |

To add rows, press TAB with cursor in last cell.

| PHMSA/State Representative | Region/State | Email Address |
|-----------------------------------|---------------------|----------------------|
| Scott Rukke | Western/WA | srukke@comcast.net |
| | | |
| | | |

To add rows, press TAB with cursor in last cell.

Remarks:

A table for recording specific tasks performed and the individuals who performed the tasks is on the last page of this form. This form is to be uploaded on to the OQBD for the appropriate operator, then imported into the file.

9.01 Covered Task Performance

Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.

| 9.01 Inspection Results (type an X in exactly one cell below) | | Inspection Notes |
|--|---|------------------|
| X | No Issue Identified | |
| | Potential Issue Identified (explain) | |
| | N/A (explain) | |
| | Not Inspected | |

Guidance: The employee or contractor individual(s) should be observed performing two separate covered tasks, with only one of the covered tasks being performed as a shop simulation. Obtain a copy of the procedure(s) used to perform the task(s). The individuals should be able to describe key items to be considered for correct performance of the task, and demonstrate strict compliance with procedure requirements. If a crew performing a job is observed (such as installing a service line, tapping a main and supplying gas to a meter set), the individual covered tasks should be identified and documented and the crew member performing the task(s) should be questioned as above.

Additional considerations for covered task observations:

1. Determine if procedures prepared by the operator to conduct the task(s) are present in the field and are being used as necessary to perform the task(s).
2. Confirm that the procedures being used in the field are the same (content, revision number, and/or date issued) as the latest approved procedures in the operator's O&M manual.
3. Confirm that the procedures employed by contractor individuals performing covered tasks are those approved by the operator for the tasks being performed.
4. Ensure that procedure adherence is accomplished and that "work-arounds"¹ are not employed that would invalidate the evaluation and qualification that was performed for the individual in performance of the task.
5. Determine if all of the tools and special equipment identified in procedures are present at the job site and are properly employed in the performance of the task, and if techniques and special processes specified are used as described. In certain circumstances, a contractor may operate the pipeline for an owner/operator. In that case, review which procedures have been used to qualify the individuals performing covered tasks and review records accordingly. Also ensure the "operating contractor" performs correct supervisory tasks such as reasonable cause determination.

¹ A "work-around" is a situation where the individual is using a procedure that wouldn't work the way it was written (due to an inadequate procedure or an equipment change that made the procedure steps invalid), or the individual has found a "better" way to get the job done faster instead of using the tool the way it was designed (e.g., not making depth measurements on a tapping tool because you had never drilled through the bottom of the pipe), or not taking the time to follow the manufacturer's instructions (not marking the stab depth when using a Continental coupling to join two sections of plastic pipe) because he never experienced a problem.

9.02 Qualification Status

Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.

| 9.02 Inspection Results (type an X in exactly one cell below) | | Inspection Notes |
|--|---|------------------|
| X | No Issue Identified | |
| | Potential Issue Identified (explain) | |
| | N/A (explain) | |
| | Not Inspected | |

Guidance: The name of each individual observed should be noted and a subsequent review of their qualification records performed to ensure that: 1) the individual was qualified to perform the task observed; and 2) the individual's qualifications are current. A review of the evaluation requirements contained in the operator's or contractor's OQ written program should be performed to ensure that all requirements were met for the current qualification. In addition, a review of the evaluation instruments (written tests, performance evaluation checklists, etc.) may be performed to determine if any of these contain deficiencies (e.g., too few questions to ensure task knowledge, failure to address critical task requirements). Reviews of qualification records and/or evaluation instruments should ensure that AOC evaluation has been performed.

9.03 Abnormal Operating Condition Recognition and Reaction

Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.

| 9.03 Inspection Results (type an X in exactly one cell below) | | Inspection Notes |
|--|---|------------------|
| X | No Issue Identified | |
| | Potential Issue Identified (explain) | |
| | N/A (explain) | |
| | Not Inspected | |

Guidance: This inspection should focus on an individual's knowledge of the AOCs applicable to the covered task being performed and the ability to recognize and react to those AOCs. The information gained during the inspection should be compared to the requirements for qualification applied by the operator or contractor during the evaluation process for the subject covered task (e.g., knowledge of task-specific AOCs in addition to generic AOCs). If contractor individuals are observed, confirm whether the AOCs identified in the operator's written program are the ones used for qualification of the contractor individual.

9.04 Verification of Qualification

Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.

| 9.04 Inspection Results (type an X in exactly one cell below) | | Inspection Notes |
|--|---|------------------|
| X | No Issue Identified | |
| | Potential Issue Identified (explain) | |
| | N/A (explain) | |
| | Not Inspected | |

Guidance: Supervisors, crew foremen or other persons in charge of field work must be able to verify that the qualifications of individuals performing covered tasks. This typically applies to individuals employed by the operator that are from another district or field office, where the qualification status may be unknown or uncertain, or to contractor individuals. Employee records should be made available through company databases or other means of verification, while contractors should be required to provide documentation of qualification prior to beginning work, and also provide a form of identification that is satisfactory to correlate the qualification documentation with the individual performing the task.

9.05 Program Inspection Deficiencies

Have potential issues identified by the headquarters inspection process been corrected at the operational level?

| 9.05 Inspection Results (type an X in exactly one cell below) | | Inspection Notes |
|--|---|------------------|
| X | No Issue Identified | |
| | Potential Issue Identified (explain) | |
| | N/A (explain) | |
| | Not Inspected | |

Guidance: If the field inspection is performed subsequent to the headquarters inspection (six months or more), the OQ database or inspection records should be checked to determine if any potential issues that were identified as having implications for incorrect task performance (e.g., no skills evaluation for tasks requiring knowledge and skills; hands-on evaluations were performed as a group as opposed to individually; span of control was not specified on a task-specific basis; evaluation and qualification on changed tasks or changed procedures not performed; inadequate provisions for, or inadequate implementation of requirements for, suspension of qualification following involvement in an incident or for reasonable cause) have been corrected.

Field Inspection Notes

The following table is provided for recording the covered tasks observed and the individuals performing those tasks.

| No | Task Name | Name/ID of Individual Observed | | | Comments |
|----|------------------------------|--------------------------------|---------------------------|---------------------------|----------|
| | | Ray Allen | John Pierce | Kevin Davis | |
| | | Correct Performance (Y/N) | Correct Performance (Y/N) | Correct Performance (Y/N) | |
| 1 | Rectifier maint. | Y | | Y | |
| 2 | CP read | Y | | Y | |
| 3 | Current interruptor | Y | | | |
| 4 | Reg station set point check | | Y | | |
| 5 | Relief valve set point check | | Y | | |
| 6 | | | | | |
| 7 | | | | | |
| 8 | | | | | |