Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Procedures and Plan Review

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 **Standard Inspection Checklist, Cover Letter and Field Report** 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	D. Lykken 5/26/2010		
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 (unit) Inspection:	March 2007	**Inspection Date(s):**	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 McChord Air Base storage facility. Jurisdiction begins at the pump suction valve (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 testing, 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 rectifiers.

HQ Address:		**System/Unit Name & 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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		CONVERSION TO SERVICE	S	U	N/A	N/C
1.	195.5	Has a written procedure been developed addressing all applicable requirements and followed?			X	

		REGULATED RURAL GATHERING LINES	S	U	N/A	N/C
2.	195.11	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	
3.	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	
4.	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	
5.	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-#5: No conversions to service. No gathering lines.

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		LOW-STRESS PIPELINES IN RURAL AREAS	S	U	N/A	N/C
6.	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	
7.	195.12(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	
8.	195.12(c)(1)	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).			X	
9.	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	
10.	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:
Item #6-#10: No low stress lines.

		SUBPART B - REPORTING PROCEDURES	S	U	N/A	N/C
11.	195.402(a) 195.402(c)(2)	Complete Annual Report and submit DOT form RSPA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year. A separate report is required for crude oil, HVL (including anhydrous ammonia), petroleum products, and carbon dioxide pipelines. **.49**	X			
12.		Accident report criteria, as detailed under 195.50. In general, **5 gallons** or more, **death or personal injury necessitating hospitalization**, or total estimated property damage including clean-up and product lost equaling **$50,000** or more. Note: A release of less than 5 gals may still require reporting. See (195.50(b) and 195.52(a)(4)).	X			
13.		Accident Report - file as soon as practicable, but no later than 30 days after discovery **.54(a)**	X			
14.		Supplemental report - required within 30 days of information change/addition **.54(b)**	X			
15.		Safety-related conditions (SRC) - criteria **.55**	X			
16.		SRC Report is required to be filed within five **(5)** working days of the determination and within ten **(10)** working days after discovery **.56(a)**	X			
17.		SCR Report requirements, including corrective actions (taken and planned) **.56(b)**	X			
		WAC 480-75 REPORTING PROCEDURES	**S**	**U**	**N/A**	**N/C**

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		SUBPART B - REPORTING PROCEDURES	S	U	N/A	N/C
18.	480-75-610	Reporting of proposed pipeline construction 45 days prior to construction. **Administrative Manual D-1, 8**	X			
19.	480-75-620	Providing notice of hydrotest to change MOP	X			
20.	480-75-630	Every company must give prompt telephonic notice to the **NRC (800) 424-8802 & commission** within two hours of discovery.	X			
21.	480-75-630(1)(e)	Damage in excess of $25,000 (Include clean up, recovery, product loss) during the inspection period. **Administrative Manual D-1,2.1**	X			
22.	480-75-630(1)(g)	Results in news media coverage	X			
23.	480-75-630(2)	Written reports within one month of the incident. **Administrative Manual D-1, 3.1**	X			
24.	480-75-630(3)	Notification within 24 hours of emergency situations including emergency shutdowns, material defects or physical damage that impairs serviceability? **Administrative Manual D-1, 4.2**	X			

Comments:
Item # 15: A dent with metal loss of about 0.8% was reported to the UTC by letter dated Sept. 18, 2009. The dent was repaired by Sept. 25, 2009.

		SUBPART C - PASSAGE OF INTERNAL INSPECTION DEVICE PROCEDURES	S	U	N/A	N/C
25.	195.402(c) 195.422	Each new pipeline or each section of a pipeline which pipe or components has been replaced must be designed and constructed to accommodate the passage of instrumented internal inspection devices that are applicable to this section **.120(a) Administrative Manual Section E (Rev. 3/08).**	X			

Comments:

		SUBPART D – WELDING, NDT, and REPAIR /REMOVAL PROCEDURES	S	U	N/A	N/C
Compliance with welding requirements for pipe replaced or repaired in the course of pipeline maintenance is required by §195.422 and §195.200.						
26.	195.402(c) 195.422	Welding must be performed by qualified welders using qualified welding procedures. **.214(a) Maintenance Manual B-3, 1**	X			
27.		Are welding procedures qualified in accordance with Sec. 5 of API 1104 or Section IX of ASME Boiler & Pressure Code? Amdt. 195-81 pub. 6/14/04, eff. 7/14/04.	X			
28.		Welding procedures must be qualified by destructive testing. **Maintenance Manual B-3**	X			
29.		Each welding procedure must be recorded in detail including results of qualifying tests. **.214(b) Maintenance Manual B-3, 1.6**	X			

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		SUBPART D – WELDING, NDT, and REPAIR /REMOVAL PROCEDURES	S	U	N/A	N/C
30.		Welders must be qualified in accordance with **Section 6 of API Standard 1104 (19th Ed., 1999)** or **Section IX of the ASME Boiler and Pressure Vessel Code (2004 Ed. Inc addenda through 7/01/2005)**, except that a welder qualified under an earlier edition than listed in **§195.3** may weld, but may not requalify under that earlier edition. Amdt 195-81 pub. 6/14/04, eff. 7/14/04.; Amdt 195-81 corr. Pub. 9/09/04; Amt 195-86 Pub. 06/09/06 eff. 07/10/06. **.222(a)** **Maintenance Manual B-3, 1.3.3**	X			
31.		Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has--(1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 9 of API 1104. **.222(b)** **Maintenance Manual B-3, 1.3.3**	X			
	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? **Maintenance Manual B-2, 5.4**				
32.	**195.402(c) 195.422**	Arc burns must be repaired. **.226(a)**	X			
33.		Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? **(Ammon. Persulfate)**. Pipe must be removed for non-repairable notches. **.226(b)**	X			
34.		The ground wire may not be welded to the pipe/fitting being welded. **.226(c)** **Maintenance Manual B-3, 2.9**	X			
		Nondestructive Testing Procedures				
35.	**195.402(c) 195.422**	Do procedures require welds to be nondestructively tested to ensure their acceptability according to **Section 9 of API 1104 (19th)** and as per **§195.228(b)** and per the requirements of **§195.234** in regard to the number of welds to be tested? 195.**228/.234** **Maintenance Manual B-3, 7.2.7**	X			
36.		Nondestructive testing of welds must be performed: **.234(b)**				
37.		1. In accordance with written procedures for **NDT**	X			
38.		2. By qualified personnel **Maintenance Manual G-2, 2.7**	X			
39.		3. By a process that will indicate any defects that may affect the integrity of the weld	X			
40.		Records of the total number of girth welds and the number nondestructively tested, including the number rejected and the disposition of each rejected weld, must be maintained. **.266**	X			
		Repair or Removal of Weld Defect Procedures				
41.	**195.402(c) 195.422**	Welds that are unacceptable (Section 9 API 1104) must be removed and/or repaired. See .228 and .230 for exceptions. **.230** **Maintenance Manual B-3, 7.5.1**	X			

Comments:

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		SUBPART E - PRESSURE TESTING PROCEDURES	S	U	N/A	N/C
42.		Pipelines, and each pipeline segment that has been relocated, replaced, or otherwise changed, must be pressure tested without leakage (see .302(b), (c), and .305(b) for exceptions). **.302(a)** **Maintenance Manual G-3,**	X			
43. 44. 45. 46.		Except for lines converted under **§195.5**, the following pipelines may be operated without having been pressure tested per Subpart E and without having established MOP under **195.406(a)(5)** [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure] .302(c) - Intrastate liquid lines constructed before 10/21/85 (excluding HVL onshore or low stress lines). .302(b)(iii) - Carbon dioxide pipeline constructed before 07/12/91 that is located in a rural area as part of production field distribution system. .302(b)(2)(ii) - Any low-stress pipeline constructed before 8/11/1994, that does not transport HVL. .302(b)(3) - Those portions of older hazardous liquid and carbon dioxide pipelines for which an operator has elected the risk-based alternative under §195.303 and which are not required to be tested based on the risk-based criteria. .302(b)(4)/.303 ***Note:*** *(An operator that elected to follow a risk-based alternative must have developed plans that included the method of testing and a schedule for the testing by December 7, 1998. The compliance deadlines for completion of testing are as shown in the table in §195.303, and in no case was testing to be completed later than 12/07/2004).*				
47.		Have pipelines <u>other than those described above</u> been pressure tested per Subpart E?	X			
48.	195.402(c) 195.422 480-93-420	If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under **195.406(a)(5),** in accordance with **.302(c)?** ***Note:*** *Establishing MOP under 195.406(a)(5) only applies to specified "older" pipelines constructed prior to the dates in .302(b).*			X	
49.		Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required. **.304** **Maintenance Manual G-3, 4.1 & 4.2**	X			
50.		All pipe, all attached fittings, including components, must be pressure tested in accordance with **§195.302**. **.305(a)** **Maintenance Manual G-3, 1.3**	X			
51.		A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory. **.305(b)**	X			
52.		Appropriate test medium **.306**	X			
53.		Pipe associated with tie-ins must be pressure tested. **.308** **Maintenance Manual G-3, 1.4**	X			
54.		Test records must be retained for useful life of the facility. **.310(a)**	X			
		Does the record required by paragraph **(a)** of this section include: **.310(b)**				
55.		Pressure recording charts. **.310(b)(1)**	X			
56.		Test instrument calibration data. **.310(b)(2)** **Maintenance Manual G-3, 4.5.5**	X			
57.		Name of the operator, person responsible, test company used, if any. **.310(b)(3)**	X			
58.		Date and time of the test. **.310(b)(4)**	X			

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		SUBPART E - PRESSURE TESTING PROCEDURES	S	U	N/A	N/C
59.		Minimum test pressure. **.310(b)(5)**	X			
60.		Test medium. **.310(b)(6)** **Maintenance Manual G-3, 4.4.11**	X			
61.		Description of the facility tested and the test apparatus. **.310(b)(7)**	X			
62.		Explanation of any pressure discontinuities, including test failures, that appear on the pressure recording charts. **.310(b)(8)** **Maintenance Manual G-3, 1**	X			
63.		Where elevation differences in the test section exceed **100 feet**, a profile of the elevation over entire length of the test section must be included **.310(b)(9)** **Maintenance Manual G-3, 4.4.4**	X			
64.		Temperature of the test medium or pipe during the test period. Amdt 195-78 pub. 9/11/03, eff. 10/14/03. **.310(b)(10)** **Maintenance Manual G-3, 4.6.7**	X			
65.		Signature of certifying agent. **WAC 480-75-420 (4)(b)** **Maintenance Manual G-3, 7**	X			
66.		Beginning and ending times of the test. **WAC 480-75-420 (4)(c)** **Maintenance Manual G-3, 7**	X			
67.		Highest and lowest pressure achieved. **WAC 480-75-420 (4)(e)** **Maintenance Manual G-3, 7**	X			
68.		Is report submitted to the commission 45 days prior to a hydro test, if test was used to raise the MOP (after 9/26/02)? **WAC 480-75-620** **Maintenance Manual G-3, 1.5**	X			

Comments:

			SUBPART F - OPERATIONS & MAINTENANCE PROCEDURES	S	U	N/A	N/C
69.	195.402(a)	a.	Has the operator prepared a manual for normal operations & maintenance activities & handling abnormal operations & emergencies? **.402**	X			
70.		b.	Procedures for reviewing the manual at intervals not exceeding 15 months, but at least each calendar year?	X			
71.		c.	Appropriate parts must be kept at locations where O&M activities are conducted.	X			

Comments:
Item #48: The pipeline was hydro tested per Subpart E.
Item #70: Operations Manual was reviewed October 2009 and Maintenance Manual was reviewed March 2010.

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		SUBPART F - MAINTENANCE & NORMAL OPERATION PROCEDURES	S	U	N/A	N/C
		Written procedures must be **followed** to provide safety during maintenance and normal operations. Does the operator have procedures for: **.402(c)**				
72.		Has the operator determined which pipeline facilities are located in areas that would require an immediate response by the operator to prevent hazards to the public if the facilities failed or malfunctioned? **.402(c)(4)** **Administrative Manual Section A-1**	X			
73.		Analyzing pipeline accidents to determine their causes? **.402 (c)(5)** **IMP 5.1**	X			
74.		Minimizing the potential for hazards identified under paragraph **(c)(4)** and minimizing the possibility of recurrence of accidents analyzed under paragraph **(c)(5)**? **.402(c)(6)** **Administrative Manual Section D-1, 5.1**	X			
75.		Starting up and shutting down any part of the pipeline system in a manner designed to assure operation within limits prescribed by **§195.406**, considering the hazardous liquid or carbon dioxide in transportation, variations in the altitude along the pipeline, and pressure monitoring and control devices? **.402(c)(7)**	X			
76.		In the case of a pipeline that is not equipped to fail safe monitoring from an attended location pipeline pressure during startup until steady state pressure and flow conditions are reached and during shut-in to assure operation within limits prescribed by **§195.406**? **.402(c)(8)**			X	
77.	195.402(a)	In the case of facilities not equipped to fail safe that are identified under **§195.402(c)(4)** or that control receipt and delivery of hazardous liquid, detecting abnormal operating conditions by monitoring pressure, temperature, flow or other appropriate operational data and transmitting this data to an attended location? **.402(c)(9)**			X	
78.		Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards **.402(c)(10)**			X	
79.		Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per §195.59.			X	
80.		Minimizing the likelihood of accidental ignition of vapors in areas near facilities identified under paragraph **(c)(4)** of this section where the potential exists for the presence of flammable liquids or gases? **.402(c)(11)** **Maintenance Manual I-2**	X			
81.		Establishing and maintaining liaison with fire, police, and other appropriate public officials to learn the responsibility and resources of each hazardous liquid pipeline emergency. **.402(c)(12)** **Maintenance Manual J, 2.1**	X			
82.		Periodically reviewing the work done by operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found? **.402(c)(13)** **Administrative Manual Section E-1, 8.8**	X			
83.		Taking adequate precautions in excavated trenches to protect personnel from hazards of unsafe accumulations of vapor or gas, making available when needed at the excavation site, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line. **.402(c)(14)** **Maintenance Manual E-11 & E-12**	X			

Comments:
Items #76 & #78: McChord Pipeline has a full time monitoring in place and pro-active monitoring 24/7.
Item #79: No offshore facilities. No crossing on navigable waterways.

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MAINTENANCE & NORMAL OPERATION PROCEDURES CONT:			S	U	N/A	N/C
84.	480-75-300	Providing leak detection under flow and no flow conditions and including a procedure for responding to alarm **Maintenance Manual D-17**	X			
85.	480-75-330	Responding to breakout tank overfill alarms			X	
86.	480-75-400	Backfilling pipe **Maintenance Manual E-11, 8**	X			
87.	480-75-410	Using a holiday detector to check coating condition prior to backfilling **Maintenance Manual E-8, 9**	X			
88.	480-75-460	100% Inspection of welds. **Maintenance Manual B-3, 7.2.2**	X			
89.	480-75-550	Reviewing change in class location for pipelines installed after 9/26/2003. **Maintenance Manual E-6**	X			
90.	480-75-660(2)(a)(ii)	Providing a schedule of inspection and testing for mechanical and electrical components within the pipeline system **Maintenance Manual D-1**	X			
91.	480-75-660(2)(a)(iii)	Describing the process for ensuring structural integrity of the pipeline by in-line inspections, hydro testing or other appropriate technique **IMP, Section 5**	X			
92.	480-75-660(2)(a)(iv)	Describing failsafe systems including emergency shutdown and isolation procedures **Operations Manual Section IV**	X			
93.	480-75-660(2)(a)(v)	Describing emergency management training for operators **Administrative Manual Section B-1, 3.3**	X			
94.	480-75-660(2)(a)(vi)	Responding to earthquakes including threshold for line shutoff and restart procedures.	X			
95.	480-75-660(2)(a)(vii)	Assessing impacts on the pipeline system due to landslides. **Maintenance Manual D-2**	X			

Comments:

ABNORMAL OPERATION PROCEDURES (CONTROL CENTER FUNCTION)				S	U	N/A	N/C
	195.402(a)	The O&M manual must contain written procedures to provide safety when operating design limits have been exceeded. Does the operator have procedures for: **.402(d)**					
		Responding to, investigating, and correcting the cause of: **.402(d)(1)**					
96.		i.	Unintended closure of valves or shutdowns? **Operations Manual Section IV. 3**	X			
97.		ii.	An increase or decrease in pressure or flow rate outside normal operating limits? **Operations Manual Section IV. 2**	X			
98.		iii.	Loss of communications? **Operations Manual Section IV. 4**	X			
99.		iv.	The operation of any safety device? **Operations Manual Section IV. 2.7**	X			
100.		v.	Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property? **Operations Manual Section IV. 5**	X			

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		ABNORMAL OPERATION PROCEDURES (CONTROL CENTER FUNCTION)	S	U	N/A	N/C
101.		Checking variations from normal operation after abnormal operations have ended at sufficient critical locations in the system to determine continued integrity and safe operations? **.402(d)(2)** **Operations Manual Section IV. A**	X			
102.		Correcting variations from normal operation of pressure and flow equipment controls? **.402(d)(3)** **Operations Manual Section IV.**	X			
103.		Does operating personnel notify responsible operator personnel where notice of an abnormal operation is received? **.402(d)(4)** **Operations Manual Section V. 3 &** **Administrative Manual Section C-2**	X			
104.		Periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found? **.402(d)(5)** **Administrative Manual Section C-2**	X			

Comments:

		EMERGENCY PROCEDURES	S	U	N/A	N/C
		The O&M manual must include written procedures to provide safety when an emergency condition occurs. Does the operator have procedures for: **.402(e)**				
105.		Receiving, identifying, and classifying notices of events which need immediate response by the operator or fire, police, or other, and notifying appropriate operator's personnel for corrective action? **.402(e)(1)** **Note:** Including third-party damage **Administrative Manual Section C-1**	X			
106.		Making a prompt and effective response to a notice of each type of emergency, fire, explosion, accidental release of hazardous liquid, operational failure, natural disaster affecting the pipeline? **.402(e)(2)** **Note:** Including third party damage **Administrative Manual Section C-1 & D-1**	X			
107.	195.402(a)	Making personnel, equipment, instruments, tools, and materials available at the scene of an emergency? **.402(e)(3)** **Administrative Manual Section C-2**	X			
108.		Taking action; such as emergency shutdown or pressure reduction, to minimize release of liquid at a failure site? **.402(e)(4)** **Administrative Manual Section C-2.2 &** **Operations Manual Section IV**	X			
109.	195.402(a)	Controlling the release of liquid at the failure site? **.402(e)(5)** **Administrative Manual Section C-2**	X			
110.		Minimizing the public **.402(e)(6)**exposure and accidental ignition, evacuation, and halting traffic on roads, railroads, etc.? **Administrative Manual Section C-2**	X			
111.		Notifying fire, police, and others of hazardous liquid emergencies and preplanned responses including **HVLs**? **.402(e)(7)** **Administrative Manual Section C-2.4.4**	X			
112.		Determining extent and coverage of vapor cloud and hazardous areas of **HVLs** by using appropriate instruments? **.402(e)(8)**			X	

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		EMERGENCY PROCEDURES	S	U	N/A	N/C
113.		Post accident review of employees activities to determine if procedures were effective and corrective action was taken? **.402(e)(9)** **Administrative Manual Section C-2.5**	X			

Comments:
Item #112: The pipeline does not transport HVL.

		EMERGENCY RESPONSE TRAINING PROCEDURES (CONTROL CENTER & FIELD)	S	U	N/A	N/C
	195.402(a)	Each operator shall establish and conduct a written continuing training program to instruct operating and maintenance personnel to: **.403(a)**				
114.		Carry out the emergency response procedures established under §195.402. **.403(a)(1)** **Administrative Manual Section B-1.1**	X			
115.		Know the characteristics and hazards of liquids or carbon dioxide transported, including in the case of **HVL**, flammability, of mixtures with air, odorless vapors, and water reactions. **.403(a)(2)** **Administrative Manual Section B-1.2**	X			
116.		Recognize conditions that are likely to cause emergencies; predict the consequences of malfunction or failures and take appropriate actions. **.403(a)(3)** **Administrative Manual Section B-1.2**	X			
117.		Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage. **.403(a)(4)** **Administrative Manual Section B-1.2**	X			
118.		Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition. **.403(a)(5)** **Administrative Manual Section B-1.3**	X			
119.		Instructions to enable O&M personnel to recognize and report potential safety related conditions. **.402(f)** **Administrative Manual Section D-1.7**	X			
		At intervals not exceeding 15 months, but at least once each calendar year: **.403(b)**				
120.		Review with personnel their performance in meeting the objectives of the emergency response training program **.403(b)(1)** **Administrative Manual Section D-1.7**	X			
121.		Make appropriate changes to the emergency response training program **.403(b)(2)** **Administrative Manual Introduction, 3**	X			
122.		Require and verify that supervisors maintain a thorough knowledge of the emergency response procedures for which they are responsible. **.403(c)** **Administrative Manual Section B-4**	X			

Comments:

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		MAPS and RECORDS PROCEDURES	S	U	N/A	N/C
123.	195.402(a) & WAC 480-75-600	Making construction records, maps, and operating history available as necessary for safe operation and maintenance. **.402(c)(1)** **Maintenance Manual B-1**	X			
		Each operator shall maintain current maps and records of its pipeline system that include at least the following information: **.404(a)** Updated within 6 months **480-75-600**				
		Location and identification of the following facilities: **.404(a)(1)**				
124.		i. Breakout tanks			X	
125.		ii. Pump stations	X			
126.		iii. Scraper and sphere facilities	X			
127.		iv. Pipeline valves	X			
128.		v. Facilities to which **§195.402(c)(9)** applies	X			
129.		vi. Rights-of-way	X			
130.		vii. Safety devices to which **§195.428** applies	X			
131.		All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines. **.404(a)(2)**	X			
132.		The maximum operating pressure of each pipeline. **.404(a)(3)**	X			
133.		The diameter, grade, type, and nominal wall thickness of all pipe. **.404(a)(4)**	X			
		Each operator shall maintain for at least **3 years** daily operating records for the following: **.404(b)**				
134.		The discharge pressure at each pump station. **.404(b)(1)**	X			
135.		Any emergency or abnormal operation to which the procedures under **§195.402** apply. **.404(b)(2)**	X			
		Each operator shall maintain the following records for the periods specified: **.404(c)**				
136.		The date, location, and description of each repair made on the pipe and maintain it for the **life of the pipe**. **.404(c)(1)** **Maintenance Manual C-2**	X			
137.		The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least **1 year**. **.404(c)(2)**	X			
138.		Each inspection and test required by **Subpart F** shall be maintained for at least **2 years, or until the next inspection or test is performed, whichever is longer**. **.404(c)(3)**	X			

Comments:
Item #124: The facility does not have any breakout tank.

		MAXIMUM OPERATING PRESSURE PROCEDURES (MOP) - ALL SYSTEMS	S	U	N/A	N/C
	195.402(a)	Except for surge pressures and other variations from normal operations, the MOP may not exceed any of the following: **.406(a)**				
139.		The internal design pressure of the pipe determined by **§195.106**. Amt. 195-86 Pub. 06/09/06 eff. 07/10/06 **.406(a)(1)**	X			
140.		The design pressure of any other component on the pipeline. **.406(a)(2)**	X			
141.		**80%** of the test pressure **(Subpart E)**. **.406(a)(3)** **Maintenance Manual G-3, 4.1**	X			

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		MAXIMUM OPERATING PRESSURE PROCEDURES (MOP) - ALL SYSTEMS	S	U	N/A	N/C
142.		**80%** of the factory test pressure or of the prototype test pressure for any individual component. **.406(a)(4)** **Maintenance Manual G-3, 1.3**	X			
143.		**80%** of the test pressure or the highest operating pressure for a minimum of **4 hours** for a pipeline that has not been tested under **Subpart E. .406(a)(5)**			X	
144.		The pipeline may not be operated at a pressure that exceeds **110% of the MOP** during surges or other variations from normal operations: **.406(b)**	X			
145.		Adequate controls and protective equipment must be installed to prevent the pressure from exceeding **110%** of the **MOP**. **Operations Manual Section VI.4**	X			

Comments:
Item #143: The pipeline was hydro tested per Subpart E.

		COMMUNICATION PROCEDURES (CONTROL CENTER)	S	U	N/A	N/C
146.	.402(a)	Operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline system. **.408(a)** **Operations Manual Section II. 2**	X			
		Does the communication system required by paragraph **(a)** include means for: **.408(b)**				
147.		Monitoring operational data as required by **§195.402(c)(9). .408(b)(1)** **Operations Manual Section II.3.3**	X			
148.		Receiving notices from operator personnel, the public, and others about abnormal or emergency conditions and initiating corrective actions. **.408(b)(2)** **Administrative Manual Section C-1.2**	X			
149.		Conducting two-way vocal communication between a control center and the scene of abnormal operations and emergencies. **.408(b)(3)** **Administrative Manual Section C-1**	X			
150.		Providing communication with fire, police, and other appropriate public officials during emergency conditions, including a natural disaster. **.408(b)(4)** **Operations Manual Section IV.11**	X			

Comments:

		LINE MARKER PROCEDURES	S	U	N/A	N/C
151.	480-75-540	Markers checked annually and replaced within 30 days	X			
152.	195.402(a)	Line markers must be placed over each buried pipeline in accordance with the following: **.410(a)** **Maintenance Manual D-2.4**	X			
153.		Located at each public road crossing, railroad crossing, and sufficient number along the remainder of each buried line so that its location is accurately known **.410(a)(1)** **Maintenance Manual D-2.4**	X			
154.		Must have the correct characteristics and information **.410(a)(2)** **Maintenance Manual D-2.4**	X			

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		LINE MARKER PROCEDURES	S	U	N/A	N/C
155.		Must be placed where pipelines are aboveground in areas that are accessible to the public **.410(c)** **Maintenance Manual D-2.4**	X			

Comments:

		INSPECTION RIGHTS-of-WAY & CROSSINGS UNDER NAVIGABLE WATER PROCEDURES	S	U	N/A	N/C
156.	480-75-540	**Depth of Cover** - For pipelines constructed after 4/1/70, depth of cover surveys every five years or every three years for areas subject to erosion or subsoiling. **Maintenance Manual D-2**	X			
157.	195.402(a)	Operator must inspect the right-of-way weekly (unless weather impedes flyovers when applicable) **WAC 480-75-530** **Maintenance Manual D-1 & Exhibit A**	X			
158.		Operator must inspect each crossing under a navigable waterway to determine the crossing condition at intervals not exceeding 5 **years. .412(b)**			X	

Comments:
Item #158: The pipeline does not cross navigable waterways.

		UNDERWATER INSPECTION PROCEDURES of OFFSHORE PIPELINES	S	U	N/A	N/C
159.	195.402(a)	Procedure to identify its pipelines in the Gulf of Mexico and its inlets in waters less than 15 feet (4.6 meters) that are at risk of being an exposed underwater pipeline or a hazard to navigation. Gathering lines of 4 ½ inches (114mm) nominal outside diameter or smaller are exempt. (Procedures must be in effect August 10, 2005.) **.413(a)**			X	
160.		Each operator shall conduct appropriate periodic underwater inspections of its pipelines in the Gulf of Mexico and its inlets in waters less than 15 feet (4.6 meters) deep as measured from mean low water based on the identified risk. **.413(b)**			X	
		When the operator discovers that a pipeline it operates is exposed on the seabed or constitutes a hazard to navigation, does the operator: **.413(c)**				
161.		Promptly, but no later than 24 hours after discovery, notify the NRC by phone. **.413(c)(1)**			X	
162.		Promptly, but not later than **7 days** after discovery, mark the location of the pipeline in accordance with **33 CFR Part 64** at each end of the pipeline segment and at intervals of not over **500 yards long**, except that a pipeline segment less than **200 yards long** need only be marked at the center. **.413(c)(2)**			X	
163.		Within **6 months** after discovery, or not later than **November 1** of the following year if the **6 month** period is after **November 1** of that year the discovery is made, place the pipeline so that the top of the pipe is **36 inches** below the seabed for normal excavation or **18 inches** for rock excavation. **.413(c)(3)**			X	
164.		Offshore pipeline condition reports - must be filed within 60 days after the inspections **.57**			X	

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Comments:
Item #159 to #164: The pipeline is not located in the Gulf of Mexico or offshore.

		VALVE MAINTENANCE PROCEDURES	S	U	N/A	N/C
165.	195.402(a)	Operator must maintain each valve that is necessary for the safe operation of its pipeline system in good working order at all times. **.420(a)** **Administrative Manual Section D-3**	X			
166.		Operator must inspect each mainline valve to determine that it is functioning properly at intervals not exceeding **7½ months**, but at least **twice** each calendar year. **.420(b)** **Administrative Manual Section D-1 & Exhibit A**	X			
167.		Operator must provide protection for each valve from unauthorized operation and from vandalism. **.420(c)** **Administrative Manual Section D-3**	X			

Comments:

		PIPELINE REPAIR PROCEDURES	S	U	N/A	N/C
168.	WAC 480-75-440	Repairs made in accordance with **ASME B31.4** **Administrative Manual Section E, 9 & IMP 7.6**	X			
169.	195.402(a)	Operator must, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons and property. **.422(a)**	X			
170.		No operator may use any pipe, valve, or fitting, for replacement in repairing pipeline facilities, unless it is designed and constructed as required by this part. **.422(b)**	X			

Comments:

		PIPE MOVEMENT PROCEDURES	S	U	N/A	N/C
171.	480-75-500	For evaluating pipe conditions during pipe movement including API 1117 stress calculations? **Maintenance Manual E-15.1**	X			
172.	195.402(a)	When moving any pipeline, the operator must reduce the pressure for the line segment involved to **50% of the MOP**. **.424(a)** **Maintenance Manual E-15, 3.2.4**	X			
		For **HVL** lines **joined** by welding, the operator must: **.424(b)**				
173.		Move the line when it does not contain **HVL**, unless impractical. **.424(b)(1)**			X	
174.		Have procedures under **§195.402** containing precautions to protect the public. **.424(b)(2)**			X	
175.		Reduce the pressure for the line segment involved to the lower of **50% of the MOP** or the lowest practical level that will maintain the **HVL** in a liquid state. **(Minimum = V.P. + 50 psig) .424(b)(3)**			X	

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		PIPE MOVEMENT PROCEDURES	S	U	N/A	N/C
		For **HVL** lines **not joined** by welding, the operator must: **.424(c)**				
176.		Move the line when it does not contain **HVL**, unless impractical. **.424(c)(1)**			X	
177.		Have procedures under **§195.402** containing precautions to protect the public. **.424(c)(2)**			X	
178.		Isolate the line to prevent flow of the **HVL**. **.424(c)(3)**			X	

Comments:
Items #173 to #178: Pipeline does not transport HVL product.

		SCRAPER and SPHERE FACILITY PROCEDURES	S	U	N/A	N/C
179.	195.402(a)	Operator must have a relief device capable of safely relieving the pressure in the barrel before insertion or removal of scrapers or spheres. **.426** **Maintenance Manual D-16.1.3**	X			
180.		Operator must have a suitable device to indicate that pressure has been relieved, or a means to prevent insertion. **Maintenance Manual D-16 & Exhibit A**	X			

Comments:

		OVERPRESSURE SAFETY DEVICE PROCEDURES	S	U	N/A	N/C
181.	195.402(a)	Operator must inspect and test each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment to determine that it is functioning properly, in good mechanical condition, has adequate capacity, and is reliable. **.428(a)** **Maintenance Manual D-1 & Exhibit A (Annually) and Maintenance Manual D-5 at Pump Station**	X			
		Operator must inspect and test overpressure safety devices at the following intervals:				
182.		1. **Non-HVL** pipelines at intervals not to exceed **15 months**, but at least once each calendar year.	X			
183.		2. **HVL** pipelines at intervals not to exceed **7½ months**, but at least **twice** each calendar year.			X	
184.		Operator must inspect and test relief valves on HVL breakout tanks at intervals not exceeding **5 years**. **.428(b)**			X	
185.		Aboveground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to section 5.1.2 of API Standard 2510. Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 unless operator noted in procedures manual (§195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank. **.428(c)**			X	
186.		After October 2, 2000, the requirements of paragraphs (a) and (b) of this section for inspection and testing of pressure control equipment apply to the inspection and testing of overfill protection systems. **.428(d)**			X	

Comments:
Item #183-#186: Pipeline does not transport HVL product and breakout tanks are not used.

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Comments:
Item #183-#186: Pipeline does not transport HVL product and breakout tanks are not used.

		FIREFIGHTING EQUIPMENT PROCEDURES	S	U	N/A	N/C
187.	195.402(a)	Operator must maintain adequate firefighting equipment at each pump station and breakout tank areas. **.430** **Maintenance Manual D-14**	X			
		The equipment must be:				
188.		a. In proper operating condition at all times.	X			
189.		b. Plainly marked so that its identity as firefighting equipment is clear.	X			
190.		c. Located so that it is easily accessible during a fire.	X			

Comments:

		BREAKOUT TANK PROCEDURES	S	U	N/A	N/C
191.	195.402(a)	Inspection of in-service breakout tanks. **(annually/ 15mo)** includes anhydrous ammonia and any other breakout tank that is not inspected per **432 (b) & (c); .432(a)**			X	
192.		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).** -Owner/operator visual, external condition inspection interval n.t.e. one month. (more frequent inspections may be needed based on conditions at particular sites) -External inspection, visual, by an Authorized Inspector at least every five years or at the quarter corrosion rate life of the shell, which ever is less. -External ultrasonic thickness measurement of the shell based on the corrosion rate. If the corrosion rate is not known, the maximum interval shall be five years. **.432(b)**			X	
193.		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. .432(c)**			X	
194.		The intervals of inspection specified by documents referenced in paragraphs (b) and (c) of this section begin on **May 3, 1999**, or on the operator's last recorded date of the inspection, whichever is earlier. -Based on thickness of the tank bottom and the corrosion rate but n.t.e. 20 years. **.432(d)**			X	
		Note: For Break-out tank unit inspection, refer to Breakout Tank Form				

Comments:
Item #191-#194: Breakout tanks are not used.

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			SIGN PROCEDURES	S	U	N/A	N/C
195.	* .402(a)	.434	Operator must maintain signs visible to the public around each pumping station and breakout tank area. **Maintenance Manual D-10**	X			
196.			Signs must contain the name of the operator and a telephone number (including area code) where the operator can be reached at all times. Amdt 195-78 pub. 9/11/03, eff. 10/14/03.	X			

Comments:

		SECURITY of FACILITY PROCEDURES	S	U	N/A	N/C
197.	195.402(a)	Operator must provide protection for each pumping station and breakout tank area and other exposed facilities from vandalism and unauthorized entry. **.436** **Maintenance Manual D-10**	X			

Comments:

		SMOKING OR OPEN FLAME PROCEDURES	S	U	N/A	N/C
198.	195.402(a)	Operator must prohibit smoking and open flames in each pump station and breakout tank area where there is the possibility of the presence of hazardous liquids or flammable vapors. **.438** **Maintenance Manual D-10**	X			

Comments:

		PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)	S	U	N/A	N/C
1.	192.402(a)	Public Awareness Program in accordance with API RP 1162. .440 **Administrative Manual Section G-2**				
2.		The operators program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .440(d)				
3.		(1) Use of a one-call notification system prior to excavation and other	X			
4.		(2) Possible hazards associated with unintended releases from a hazardous liquids or carbon dioxide pipeline facility; **Administrative Manual Section G-2**	X			
5.		(3) Physical indications of a possible release;	X			
6.		(4) Steps to be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release;	X			
7.		(5) Procedures to report such an event (to the operator).	X			
8.		Does program include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations. .440(e)	X			
9.		The operator's program and the media used must be comprehensive enough to reach all areas the operator transports gas. .440(f) **Administrative Manual Section G-4**	X			
10.		Is the program conducted in English and any other languages commonly understood by a significant number of the population? .440(g)	X			

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Comments:

			DAMAGE PREVENTION PROGRAM PROCEDURES (Also in accordance with API 1162)	S	U	N/A	N/C
199.		.442(a)	Is there a written program in place to prevent damage by excavation activities applicable to the operator's pipelines? **Administrative Manual Section G-4**	X			
200.		.442(b)	Does the operator participate in a qualified One-Call program? **Administrative Manual Section G-4**	X			
201.		.442(c)(1)	Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located. **Administrative Manual Section G-4.D.2.**	X			
		.442(c)(2)	Provide for notification to the public in the vicinity of the pipeline and actual notification to the persons identified in paragraph **(c)(1)** of this section of the following, as often as needed to make them aware of the damage prevention program:				
202.			i. The program's existence and purpose. **Administrative Manual Section G-4.E.1**	X			
203.			ii. How to learn the location of underground pipelines before excavation activities are begun.	X			
204.	.402(a)	.442(c)(3)	Provide a means of receiving and recording notification of planned excavation activities. **Administrative Manual Section G-4.E.1**	X			
205.		.442(c)(4)	If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings. **Administrative Manual Section G-4.E.1**	X			
206.		.442(c)(5)	Provide for marking of buried pipelines in the area of excavation activity within **2 business days. RCW 19.122** **Administrative Manual Section G-4**	X			
		.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
207.			i. The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline. **Administrative Manual Section G-4.D.1**	X			
208.			ii. In the case of blasting, any inspection must include leakage surveys.	X			
209.			Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? **Administrative Manual Section J-6.2.4.6**	X			
			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-1.5.1**	X			
210.			**Damage Prevention (Operator Internal Performance Measures)**				
211.			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			
212.			Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?			X	

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DAMAGE PREVENTION PROGRAM PROCEDURES (Also in accordance with API 1162)				S	U	N/A	N/C
213.			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	
214.			Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? **Administrative Manual Appendix C & OQ Covered Task #13**	X			
215.			Review operator locating and excavation procedures for compliance with state law and regulations. **Administrative Manual Appendix C & OQ Covered Task #14**	X			
216.			Are locates are being made within the timeframes required by state law and regulations? Examine record sample. **Maintenance Manual J-6**	X			
217.			Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? **Administrative Manual Appendix C & OQ Covered Task #13**	X			

DAMAGE PREVENTION PROGAM PROCEDURES (State Requirements)		S	U	N/A	N/C
218.	Terminating the flow of hazardous liquid in pipeline immediately upon receiving information of third party damage. **RCW 19.122.035 (2)** **Administrative Manual Section C-2**	X			
219.	Has the pipeline company visually inspected the damaged pipeline **RCW 19.122.035 (2)** **Maintenance Manual E.2**	X			
220.	Has the pipeline company determined if the damaged pipeline should be repaired or replaced **RCW 19.122.035 (2)** **Maintenance Manual E.2**	X			

Comments:
Item #212-#213: McChord Pipeline does not use contractors for Damage Prevention Program.

CPM/LEAK DETECTION PROCEDURES				S	U	N/A	N/C
221.	.402(a)	.444 & WAC 480-75-300	If a CPM system is installed, does the operators procedures for the Computational Pipeline Monitoring (CPM) leak detection system comply with API 1130 in operating, maintaining, testing, record keeping, and dispatching training? **Maintenance Manual D-17.1.3**	X			

Comments:

Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002			S	U	N/A	N/C
	49 U.S.C. 60132, Subsection (b)	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			

PIPELINE INTEGRITY MANAGEMENT IN HIGH CONSEQUENCE AREAS PROCEDURES			S	U	N/A	N/C
	.452	This form does not cover Liquid Pipeline Integrity Management Programs				

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		SUBPART G - OPERATOR QUALIFICATION PROCEDURES	S	U	N/A	N/C
	.501 -.509	Refer to Operator Qualification Inspection Forms and Protocols (OPS web page)				

		SUBPART H - CORROSION CONTROL PROCEDURES 195.402(a)	S	U	N/A	N/C
222.		Do procedures require that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures for which they are responsible for insuring compliance? **.555** **Maintenance Manual D-6.1.5**	X			
		Except bottoms of aboveground breakout tanks, each buried or submerged pipeline must have an external coating for external corrosion control if the pipeline is : **.557**				
223.		a) Constructed, relocated, replaced, or otherwise changed after the applicable dates : 3/31/70 - interstate pipelines excluding low stress 7/31/77 -interstate offshore gathering excluding low stress 10/20/85-intrastate pipeline excluding low stress 7/11/91- carbon dioxide pipelines 8/10/94 - low stress pipelines NOTE: This does not include the movement of pipe under **195.424**.			X	
224.		b) Converted under **195.5** and 1) Has an external coating that substantially meets **195.559** before the pipeline is placed in service or;			X	
225.		2) Is a segment that is relocated, replaced, or substantially altered?			X	
226.	**195.402(a)**	**Coating Materials;** Coating material for external corrosion control must: a. Be designed to mitigate corrosion of the buried or submerged pipeline; b. Have sufficient adhesion to the metal surface to prevent under film migration of moisture; c. Be sufficiently ductile to resists cracking; d. Have enough strength to resist damage due to handling and soil stress; e. Support any supplemental cathodic protection; and f. If the coating is an insulating type, have low moisture absorption and provide high electrical resistance. **.559** **Maintenance Manual E.8**	X			
227.		a. All external pipe coatings required under **195.557** must be inspected just prior to lowering the pipe in the ditch or submerging the pipe. **Maintenance Manual E.8.9**	X			
228.		b. All coating damage discovered must be repaired. **Maintenance Manual E.8.9**	X			
229.		a. Is cathodic protection applied to pipelines that have been subjected to the conditions listed in **195.557(a) within one (1) year**? **.563**	X			
		b. Each buried or submerged pipeline converted under **195.5** must have cathodic protection if the pipeline-				
230.		1) Has cathodic protection that substantially meets **195.571** before the pipeline is placed in service, or	X			
231.		2) Is a segment that is relocated, replaced, or substantially altered?	X			
232.		c. All other buried or submerged pipelines that have an effective external coating must have cathodic protection.	X			
233.		d. Bare pipelines, breakout tank areas, 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			
234.		e. Unprotected pipe must have cathodic protection if required by **195.573(b)**.			X	
235.		Test leads installation and maintenance. **.567** **Maintenance Manual D-6**	X			
236.		For placement of test stations at casing? **WAC 480-75-340** **Maintenance Manual D-6, Exhibit 1**	X			

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		SUBPART H - CORROSION CONTROL PROCEDURES 195.402(a)	S	U	N/A	N/C
237.		Examination of Exposed Portions of Buried Pipelines. **.569** **Maintenance Manual G-1**	X			
238.		Examination of pipe prior to backfilling. **WAC 480-75-520** **Maintenance Manual E-8.9**	X			
239.		Cathodic protection must comply with one or more of the applicable criteria and other considerations for cathodic protection contained in paragraphs **6.2 and 6.3 of NACE Standard RP0169-96** (incorporated by reference). **.571** **Maintenance Manual D-6.2.1.1**	X			
240.		a. (1) Pipe to soil monitoring **(annually / 15months). .573** **Maintenance Manual D-1, Exhibit A**	X			
241.		Separately protected short sections of bare ineffectively coated pipelines **(every 3 years not to exceed 39 months).**			X	
242.		(2) **Before 12/29/2003 or not more than 2 years** after cathodic protection installed, whichever comes later, identify the circumstances in which a close-interval survey or comparable technology is practicable and necessary to accomplish the objectives of paragraph **10.1.1.3 of NACE RP0169-96.** **Maintenance Manual D-6.2.1**	X			
		b. Unprotected buried or submerged pipe must be evaluated and cathodically protected in areas in which active corrosion is found as follows;				
243.		1) Determine areas of active corrosion by electrical survey (closely spaced pipe-to-soil survey), or where electrical survey is impractical, by other means that include review of analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipe environment			X	
244.		2) Before 12/29/2003 - at least **once every 5 years not to exceed 63 months.** Beginning 12/29/2003 - at least **once every 3 years not to exceed 39 months.**			X	
245.		**b.** Rectifiers, Reverse Current Switches, Diodes, Interference Bonds whose failure would jeopardize structural protection **- at least 6 times each year, intervals not to exceed 2½ mos.** **Maintenance Manual D-1, Exhibit 1**	X			
246.		d. Inspect each cathodic protection system used to control corrosion on the bottom of an aboveground breakout tank to ensure that operation and maintenance of the system are in accordance with API Recommended Practice 651. (Not required if it is noted in the corrosion control procedures why compliance with all or certain operation and maintenance provisions of API Recommended Practice 651 is not necessary for the safety of the tank.)			X	
247.		e. Any deficiencies identified in corrosion control must be corrected as required by **195.401(b).** **Maintenance Manual D-6. 2.8**	X			
248.		Remediation of corrosion system deficiencies initiated within 90 days of discovery **WAC 480-75-510** **Maintenance Manual D-6. 2.4**	X			
249.		Are there adequate provisions for electrical isolations? **.575** **Maintenance Manual E-14**	X			
250.		a. For pipelines exposed to stray currents, is there a program to minimize the detrimental effects. b. Design & install CP systems to minimize effects on adjacent metallic structures. **.577** **Maintenance Manual D-6. 3.7**	X			
251.		a. For pipelines that transport any hazardous liquid or carbon dioxide that would corrode the pipe, are corrosive effects investigated and adequate steps taken. **Maintenance Manual D-6. 1.4**	X			

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SUBPART H - CORROSION CONTROL PROCEDURES 195.402(a)			S	U	N/A	N/C
252.		b. Internal Corrosion - Inhibitors - do procedures show that they are to be used in conjunction with coupons or other monitoring equipment to determine the effectiveness of the inhibitors in mitigating internal corrosion. **.579** **Maintenance Manual D-6. 1.4**	X			
253.		Coupons or other monitoring equipment must be examined **at least 2 times each year, not to exceed 7 ½ months.**			X	
254.		c. Whenever pipe is removed from a pipeline, the internal surface of the pipe must be inspected for evidence of corrosion as well as the adjacent pipe. **Maintenance Manual G-1.3.2**	X			
255.		Are pipelines protected against Atmospheric Corrosion using required coating material? (See exception to this statement). **.581** **Maintenance Manual E-8**	X			
		Atmospheric corrosion monitoring - **.583**				
256.		**ONSHORE** - At least **once every 3 years but at intervals not exceeding 39 months.** **Maintenance Manual D-1**	X			
257.		**OFFSHORE** - At least **once each year, but at intervals not exceeding 15 months.**			X	
258.		a. Are procedures in place and are they followed to either reduce the **MOP**, or repair/replace pipe if general corrosion has reduced the wall thickness? **.585** **Maintenance Manual E-2.10**	X			
259.		c. Are procedures in place and are they followed to either reduce the **MOP**, or repair/replace if localized corrosion has reduced the wall thickness? **Maintenance Manual E-2.10**	X			
260.		Are applicable methods used in determining the strength of corroded pipe **(ASME B-31G, RSTRENG)? .587** **Maintenance Manual E-2.10**	X			
261.		Corrosion Control Records Retention (Some are required for **5 yrs**; Some are for the **service life**). **589** **Maintenance Manual D-6**	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 Drug and Alcohol Program Check.				

Comments:
Item #223-225: The pipeline was constructed in 1957 and not converted.
Item #234, 241, 243, 244: All sections of the pipeline is coated and protected by CP, i.e. there is no bare pipe in the system.
Item #246: There are no breakout tanks on the pipeline.
Item #253: Coupons are not used in the pipeline because the history (1957) of the pipeline has not shown internal corrosion.
Item #257: The pipeline is not located offshore.

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Oil Pollution Act (49 CFR 194)

		Field Verification of Facility Response Plan Information				Y	N	N/A
262.	194.111	Is there a copy of the approved Facility Response Plan present? [See Guidance OPA-1]				X		
		RSPA Tracking Number:	1248	Approval Date:	12/15/2009			
263.	194.107	Are the names and phone numbers on the notification list in the FRP current?[OPA-2] **Appendix C & Table 3.1**				X		
264.	194.107	Is there written proof of a contract with the primary oil spill removal organization (OSRO)? [OPA-3] **Appendix E**				X		
265.	194.107	Are there complete records of the operator's oil spill exercise program? [OPA-4] **Yes, last exercise was September 10, 2009.**				X		
266.	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
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.htm