

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.
Results All

Inspection Information

Inspection Name	[8805] ALA Energy (Petrogas) PA	Operator(s)	ALA ENERGY LLC (39663)	Plan Submitted	06/18/2024
		Lead	Derek Norwood	Plan Approval	06/24/2024 by Dennis Ritter
Status	LOCKED	Team Members	Lex Vinsel, Tom Green	All Activity Start	06/25/2024
Start Year	2024	Observer(s)	David Cullom, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Jason Hoxit	All Activity End	06/28/2024
System Type	HL	Supervisor	Dennis Ritter	Inspection Submitted	11/14/2024
Protocol Set ID	WA.HL.2024.01	Director	Scott Rukke	Inspection Approval	11/14/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary
Public Awareness Plan Inspection

Facilities visited and Total AFOD
Facility in Ferndale, WA

Summary of Significant Findings
(DO NOT Discuss Enforcement options)
One probable violation due to lack of records for 2021 and 2022 annual implementation audit

Primary Operator contacts and/or participants
Michael Evans, Operations Superintendent

SUPERINTENDENT | OPERATIONS

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Midstream Operations

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Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86236 (1580)	Petrogas	unit	86236	Offshore GOM CO2 Rural Low Stress Reg Rural Gather Abandoned	55	55	55	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	86236 (1580)	--	PD	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Public Awareness (P A)	--	06/25/2024 06/28/2024	--	all planned questions	all assets	all types	55	55	55	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Public Awareness (PA)	COMPLETED	06/26/2024	Public Awareness (PA)	86236 (1580)

Results (all values, 55 results)

68 (instead of 55) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERL: Emergency Response Liquids

1. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 86236 (1580)

Result Notes Reviewed Stakeholder Letters sent out Dec. 20, 2023.

FS.FG: Facilities General

2. Question Result, ID, References **Sat, FS.FG.FACPROTECT.O, 195.436** (also presented in: PD.SN)
 Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*
 Assets Covered **86236 (1580)**
 Result Notes **Facilities are protected from vandalism and unauthorized entry.**
3. Question Result, ID, References **Sat, FS.FG.IGNITION.O, 195.438** (also presented in: PD.SN)
 Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*
 Assets Covered **86236 (1580)**
 Result Notes **Protective fence has no smoking or open flames signs attached.**
4. Question Result, ID, References **Sat, FS.FG.IGNITION.R, 195.404(c) (195.438)** (also presented in: PD.SN)
 Question Text *Do records show precautions taken to prevent ignition sources in areas with a potential for accumulating flammable vapors or leaking hazardous liquids?*
 Assets Covered **86236 (1580)**
 Result Notes **Reviewed sample of hot work permits.**
5. Question Result, ID, References **Sat, FS.FG.SIGNAGE.O, 195.434** (also presented in: PD.SN)
 Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*
 Assets Covered **86236 (1580)**
 Result Notes **Pipeline Markers are placed at each end of the pipeline.**
6. Question Result, ID, References **Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434)** (also presented in: PD.SN)
 Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*
 Assets Covered **86236 (1580)**
 Result Notes **O&M - Pipeline System Facility Manual - Section 4.2**

Pipeline Markers are present over the pipeline as required.
7. Question Result, ID, References **Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438)** (also presented in: PD.SN)
 Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*
 Assets Covered **86236 (1580)**
 Result Notes **O&M - Pipeline System Facility Manual - Section 4.12**
8. Question Result, ID, References **Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436)** (also presented in: PD.SN)
 Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*
 Assets Covered **86236 (1580)**
 Result Notes **O&M - Pipeline System Facility Manual - Section 4.2**

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

9. Question Result, ID, References **Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b))** (also presented in: PD.RW)
 Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*
 Assets Covered **86236 (1580)**
 Result Notes **Reviewed records of Patrols and Monitoring Records are at the other building, NOT available on Tues.**
10. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 195.412(a)** (also presented in: PD.RW)
 Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
 Assets Covered **86236 (1580)**

Result Notes ROW conditions are acceptable for the type of patrolling used.

11. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: PD.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 86236 (1580)

Result Notes Pipeline markers are visible at both ends of the pipeline segment.

12. Question Result, ID, References Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: PD.RW)

Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*

Assets Covered 86236 (1580)

Result Notes Maintenance and Inspection Procedures (MIP) (Rev 2021) Section 6.0 Pipeline and Facility Marking Instructions.

13. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP 1162, Section 8) (also presented in: PD.RW)

Question Text *Does the process address how line markers are to be placed and maintained?*

Assets Covered 86236 (1580)

Result Notes Maintenance and Inspection Procedures (MIP) (Rev 2021) Section 6.0 Pipeline and Facility Marking Instructions.

PD.DP: Damage Prevention

14. Question Result, ID, References NA, PD.DP.ONECALL.P, 195.442(a) (195.442(b))

Question Text *Does the process require participation in qualified one-call systems?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

15. Question Result, ID, References NA, PD.DP.PROGRAM.P, 195.442(a)

Question Text *Does the operator have a damage prevention program approved and in place?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

16. Question Result, ID, References NA, PD.DP.PUBLICNOTIFY.P, 195.442(a) (195.442(c)(2))

Question Text *Does the process include public notification requirements?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

17. Question Result, ID, References NA, PD.DP.EXCAVATEMARK.P, 195.442(a) (195.442(b), 195.442(c)(4), 195.442(c)(5))

Question Text *Does the process require marking proposed excavation sites?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

18. Question Result, ID, References NA, PD.DP.EXCAVATE.P, 195.442(a) (195.442(c)(6))

Question Text *Does the process include inspection of pipelines that could be damaged by excavation activities?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

19. Question Result, ID, References NA, PD.DP.TPD.P, 195.442(a) (195.442(b), 195.442(c)(1))

Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

20. Question Result, ID, References NA, PD.DP.TPDONECALL.P, 195.442(a) (195.442(b), 195.442(c)(3))

Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

21. Question Result, ID, References NA, PD.DP.ONECALL.O, 195.442(c)(3)

Question Text *Observe operator's process for a "One Call" Ticket.*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

22. Question Result, ID, References NA, PD.DP.PROGRAM.R, 195.442(a)

Question Text *Do records indicate the damage prevention program is being carried out as written?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

PSFM 4.3.1 & 7.7 Based on the exemption presented by 195.442(d)(2), the facility is exempt from the Damage Prevention Rules.

23. Question Result, ID, References **Sat, PD.DP.NOTICETOEXCAVATOR.P,**

Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*

Assets Covered **86236 (1580)**

Result Notes **PSFM Section 7.7.2 - Information Provided to Excavators**

24. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**

Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*

Assets Covered **86236 (1580)**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

25. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.P,**

Question Text *Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-75-630(6)?*

Assets Covered **86236 (1580)**

Result Notes **Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024**

PSFM Section 7.7 Pipeline Damage Reports

26. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**

Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-75-630(6)?*

Assets Covered **86236 (1580)**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

27. Question Result, ID, References **Sat, PD.DP.LOCATES.P,**

Question Text *Is there a process to locate hazardous liquid pipelines within the timeframe outlined in RCW 19.122?*

Assets Covered **86236 (1580)**

Result Notes **Pipeline System Facility Manual (PSFM) Rev 6 Last Rev Date June 19, 2024**

PSFM Section 4.3.1 - Damage Prevention

28. Question Result, ID, References **NA, PD.DP.LOCATES.R,**

Question Text *Do records indicate hazardous liquid pipeline locations have been marked in the timeframe outlined in RCW 19.122?*

Assets Covered **86236 (1580)**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

PD.PA: Public Awareness

29. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 195.440(b) (API RP 1162, Section 2.7 Step 4)**

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered **86236 (1580)**

Result Notes **Public Awareness Plan (PAP) Rev 4, December 20, 2023**

PAP Section 1.0 - Introduction

30. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162 Section 3)**
 Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*
 Assets Covered **86236 (1580)**
 Result Notes **Public Awareness Plan (PAP) Rev 4, December 20, 2023**
- PAP Section 3.0 Stakeholder Identification**
31. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 195.440(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)**
 Question Text *Does the operator's program documentation demonstrate management support?*
 Assets Covered **86236 (1580)**
 Result Notes **Michael Evans is the person in charge and support for the programs is shown on the stakeholder letter, signed by Michael Evans, Superintendent of Operations.**
32. Question Result, ID, References **Sat, PD.PA.PROGRAM.P, 195.440(a) (195.440(h))**
 Question Text *Has the continuing public education (awareness) program been established as required?*
 Assets Covered **86236 (1580)**
 Result Notes **Public Awareness Plan (PAP) Rev 4, December 20, 2023**
- PAP Section 4.0 Key Messages/Content**
33. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**
 Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*
 Assets Covered **86236 (1580)**
 Result Notes **Reviewed Stakeholder letters sent out on December 20, 2023. Appear adequate.**
34. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 195.440(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)**
 Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where hazardous liquid or carbon dioxide is transported?*
 Assets Covered **86236 (1580)**
 Result Notes **Public Awareness Plan (PAP) Rev 4, December 20, 2023**
- PAP 5.0 Message Delivery Methods and Media**
- Program appears adequate.**
35. Question Result, ID, References **Sat, PD.PA.SUPPLEMENTAL.P, 195.440(c) (API RP 1162 Section 6.2)**
 Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience along all pipeline systems, as described in API RP 1162?*
 Assets Covered **86236 (1580)**
 Result Notes **Public Awareness Plan (PAP) Rev 4, December 20, 2023**
- PAP 7.1 Objectives, Bullet 2**
36. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 195.440(d) (195.440(f))**
 Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §195.440(d)?*
 Assets Covered **86236 (1580)**
 Result Notes **Reviewed text of Stakeholder Letters (sample) sent on December 20, 2023.**

37. Question Result, ID, References **Sat, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f))**
 Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?*
 Assets Covered **86236 (1580)**
 Result Notes **Public Awareness Plan (PAP) Rev 4, December 20, 2023**
- PAP 5.0 Message Delivery Methods and Media, and Appendix D: Public Awareness Outreach Action Plan.**
38. Question Result, ID, References **Sat, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1)**
 Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1?*
 Assets Covered **86236 (1580)**
 Result Notes **All stakeholder communication is delivered annually.**
39. Question Result, ID, References **NA, PD.PA.LANGUAGE.P, 195.440(g) (API RP 1162 Section 2.3.1)**
 Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
 Assets Covered **86236 (1580)**
 Result Notes **No such requirement existed in the scope of inspection review.**
40. Question Result, ID, References **NA, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 Section 2.3.1)**
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
 Assets Covered **86236 (1580)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
41. Question Result, ID, References **Sat, PD.PA.EVALPLAN.P, 195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E)**
 Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*
 Assets Covered **86236 (1580)**
 Result Notes **Public Awareness Plan (PAP) Rev 4, December 20, 2023**
- PAP 7.0 Program Evaluation Procedure**
42. Question Result, ID, References **Unsat, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**
 Question Text *Has an audit or review of the public awareness program implementation been performed annually since the program was developed?*
 Assets Covered **86236 (1580)**
 Result Issue Summary **No records available for 2021 and 2022 for the annual implementation audit**
 Standard Issues **C (Documentation/administrative - no significant impact) : 195.440(i) : No record/documentation.**
 Result Notes **Annual review since 2015 but missed 2021 & 2022**
43. Question Result, ID, References **Sat, PD.PA.AUDITMETHODS.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**
 Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of the public awareness program implementation?*
 Assets Covered **86236 (1580)**
 Result Notes **2023 - Internal Audit and regulatory inspections.**
44. Question Result, ID, References **Sat, PD.PA.PROGRAMIMPROVE.R, 195.440(c) (API RP 1162 Section 8.3)**
 Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*
 Assets Covered **86236 (1580)**

PAP Review and Revision Log

Review and Revisions Descriptions appear adequate.

45. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 Sections 8.4)
Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*
Assets Covered 86236 (1580)
Result Notes Last Efficacy of Program conducted in 2018. Due for another this year.
46. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 195.440(c) (API RP 1162 Section 8.4.1)
Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
Assets Covered 86236 (1580)
Result Notes Last Efficacy of Program conducted in 2018. Due for another this year.
47. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(c) (API RP 1162 Section 8.4.2)
Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*
Assets Covered 86236 (1580)
Result Notes 2018 was a baseline year for the Public Awareness Program Audit Findings.
48. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 195.440(c) (API RP 1162 Section 8.4.3)
Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*
Assets Covered 86236 (1580)
Result Notes Key informant interview results indication stakeholder awareness of key topics
49. Question Result, ID, References NA, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 Section 8.4.4)
Question Text *Did the operator attempt to measure bottom-line results of the program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*
Assets Covered 86236 (1580)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
50. Question Result, ID, References Sat, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)
Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*
Assets Covered 86236 (1580)
Result Notes Changes were to improve the documentation of mailings and any activities associated with the Public Awareness Program. (PAP)

PD.RW: ROW Markers, Patrols, Monitoring

51. Question Result, ID, References NA, PD.RW.INFORMATION.P, 195.402(c)(3) (195.452(f)(3), 195.452(g))
Question Text *Does the process require damage prevention information to be gathered and recorded during pipeline patrols and surveillance and then analyzed?*
Assets Covered 86236 (1580)
Result Notes No such requirement existed in the scope of inspection review.
52. Question Result, ID, References NA, PD.RW.INFORMATION.R, 195.404(c) (195.402(c)(3), 195.452(f)(3), 195.452(g))
Question Text *Do records show damage prevention information being gathered and recorded during pipeline patrols and surveillance and then analyzed is available for review?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

No Damage Prevention Program required due to 195.442 (d)(2) as operator has control over all pipeline.

PD.SP: Special Permits

53. Question Result, ID, References NA, PD.SP.REPAIR.P, 190.341(d)(2)

Question Text *If a pipeline is operated under a special permit have processes been modified to incorporate the requirements of the permit for required repairs?*

Assets Covered 86236 (1580)

Result Notes No such requirement existed in the scope of inspection review.

54. Question Result, ID, References NA, PD.SP.REPAIR.R, 190.341(d)(2)

Question Text *If a pipeline is operated under a special permit, do records indicate that required repairs were performed?*

Assets Covered 86236 (1580)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

55. Question Result, ID, References NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)

Question Text *If a pipeline is operated under a special permit, verify that the requirements have been implemented.*

Assets Covered 86236 (1580)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

PD.PA: Public Awareness

56. Question Result, ID, References Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also presented in: EP.ERL)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 86236 (1580)

Result Notes Reviewed Stakeholder Letters sent out Dec. 20, 2023.

PD.RW: ROW Markers, Patrols, Monitoring

57. Question Result, ID, References Sat, MO.RW.PATROL.P, 195.402(a) (195.412(a), 195.412(b)) (also presented in: MO.RW)

Question Text *Does the process require inspection of ROW surface conditions and crossings under navigable waterways, as well as reporting and mitigation of findings from said inspections?*

Assets Covered 86236 (1580)

Result Notes Maintenance and Inspection Procedures (MIP) (Rev 2021) Section 6.0 Pipeline and Facility Marking Instructions.

58. Question Result, ID, References Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: MO.RW)

Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*

Assets Covered 86236 (1580)

Result Notes Reviewed records of Patrols and Monitoring Records are at the other building, NOT available on Tues.

59. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 195.412(a) (also presented in: MO.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered 86236 (1580)

Result Notes ROW conditions are acceptable for the type of patrolling used.

60. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: MO.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 86236 (1580)

Result Notes Pipeline markers are visible at both ends of the pipeline segment.

61. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 195.402(a) (195.410(a), 195.410(c), API RP 1162, Section 2.7, API RP References 1162, Section 8) (also presented in: MO.RW)

Question Text *Does the process address how line markers are to be placed and maintained?*

Assets Covered 86236 (1580)

Result Notes Maintenance and Inspection Procedures (MIP) (Rev 2021) Section 6.0 Pipeline and Facility Marking Instructions.

PD.SN: Facilities Signage and Security

62. Question Result, ID, Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: FS.FG) References

Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*

Assets Covered 86236 (1580)

Result Notes Facilities are protected from vandalism and unauthorized entry.

63. Question Result, ID, Sat, FS.FG.IGNITION.O, 195.438 (also presented in: FS.FG) References

Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*

Assets Covered 86236 (1580)

Result Notes Protective fence has no smoking or open flames signs attached.

64. Question Result, ID, Sat, FS.FG.IGNITION.R, 195.404(c) (195.438) (also presented in: FS.FG) References

Question Text *Do records show precautions taken to prevent ignition sources in areas with a potential for accumulating flammable vapors or leaking hazardous liquids?*

Assets Covered 86236 (1580)

Result Notes Reviewed sample of hot work permits.

65. Question Result, ID, Sat, FS.FG.SIGNAGE.O, 195.434 (also presented in: FS.FG) References

Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*

Assets Covered 86236 (1580)

Result Notes Pipeline Markers are placed at each end of the pipeline.

66. Question Result, ID, Sat, FS.FG.IGNITION.P, 195.402(c)(3) (195.438) (also presented in: FS.FG) References

Question Text *Does the process prohibit smoking and open flames in each pump station and breakout tank area, or where there is the possibility of the leakage of a flammable hazardous liquid or the presence of flammable vapors?*

Assets Covered 86236 (1580)

Result Notes O&M - Pipeline System Facility Manual - Section 4.12

67. Question Result, ID, Sat, FS.FG.PROTECTION.P, 195.402(c)(3) (195.436) (also presented in: FS.FG) References

Question Text *Does the process require facilities to be protected from vandalism and unauthorized entry?*

Assets Covered 86236 (1580)

Result Notes O&M - Pipeline System Facility Manual - Section 4.2

68. Question Result, ID, Sat, FS.FG.SIGNAGE.P, 195.402(c)(3) (195.434) (also presented in: FS.FG) References

Question Text *Does the process require operator signs to be posted around each pump station and breakout tank area?*

Assets Covered 86236 (1580)

Result Notes O&M - Pipeline System Facility Manual - Section 4.2

Pipeline Markers are present over the pipeline as required.

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