

**POST INSPECTION MEMORANDUM**

**Inspector:** Kuang Chu - UTC 8/6/2012  
**Reviewed:** Joe Subits - UTC 8/7/2012  
**Peer Reviewed:** RR  
**Follow-Up Enforcement:** No Violation ✓  
**PCP\* - PCO\* - NOA - WL - LOC**  
**Director Approval\*** (17)  
12/18/12

**Date:** August 6, 2012

**Operator Inspected:**  
Chevron Pipe Line Company

**OPID:** 2731      **Region:** Western

**RECEIVED**

**JAN 08 2013**

State of Washington  
UTC  
Pipeline Safety Program

**Unit Address:**  
2900 Sacajawea Park Road  
Pasco, WA 99301-3404

**Unit Inspected:** Chevron - Pipeline Pasco & Breakout Tanks      **Unit ID:** 5145 & 55935

**Unit Type:** Interstate Hazardous Liquid

**Inspection Type:** I01 - Standard Inspection, I08-00 Protocol #9 Field Verification, and I07-IMP Field Verification & Follow up I0-9 - Integrated Inspection

**Record Location:** Pasco, WA

**Inspection Dates:** July 9-13, 2012, July 18-20

**AFODs:** (I01-4.0, I08-0.5, I09-0.5) → 2.5, 2.5

**SMART Activity Number:** ~~5145 & 55935~~ 141575, 140855

**Operator Contact:** Gary Saenz

**Phone:** (713) 432-3332

**Fax:** (713) 432-3477

**Emergency:** (888) 762-3404

**Unit Description:**

The pipeline system (Unit #5145) enters the Washington State from Salt Lake City, Utah at the Washington/Oregon border in Walla Walla County at approximately mile post (MP) 549 and extends north to Pasco Terminal at MP 569.02 in Franklin County. This pipeline provides refined products which arrive at the Pasco Terminal via a 6-inch pipeline from Oregon. A second parallel pipeline from Oregon is idle and consists of a 6-inch pipeline between the border to Burbank at MP 568.28 and an 8-inch pipeline between Burbank and the Pasco Terminal. The Pasco Terminal is equipped with three products transfer pumps connected to a 6-inch pipeline to the Spokane Terminal at MP 705. The pipelines were built between 1956 and 1959.

The breakout unit (Unit #55935) consists of 18 breakout tanks at the Pasco terminal and one breakout tank at the Spokane terminal. The breakout tank at the Spokane terminal is a surge relief tank. All the breakout tanks in this inspection unit have been modified to double bottom over the last few years. All the tank bottom plates have been lined with epoxy during the double bottom modifications. The Pasco terminal can either receive refined products from a refinery in Salt Lake City through a 6" pipeline, or by barge via the Columbia River from Portland area.

**Facilities Inspected:**

This pipeline inspection consisted of a records review at Chevron's Pasco office. The field inspection was performed at the Pasco Terminal, Spokane Terminal, Fairchild Delivery station, the Spokane River Span, various valve stations, cathodic protection test stations, road crossing casings, rectifiers, and the right-of-way.

A number of breakout tanks at the Pasco terminal and one at the Spokane Terminal were inspected. The inspection included the associated piping in the tank farm, spill impoundment, security systems, firefighting equipment, atmospheric corrosion, and tank foundation. A review was made of the records of tank monthly and annual in-service inspections, valve inspections, inspection of overpressure safety devices, and atmospheric corrosion inspections. The API 653 out-of-service internal inspection reports for T-6, 12, 15, 18, and 19 were reviewed. The API 653 in-service external inspection reports for T-1, 2, 7 and 5504 were reviewed.

**Team Members:**

Claude Allen, PHMSA Western Region, Lead  
 Dave Mulligan, PHMSA Western Region  
 Kuang Chu, Washington UTC

**Persons Interviewed:**

Persons Interviewed	Titles	Phone No.
Paul Falgout	Team Leader, Health, Environment & Safety and DOT Pipeline Safety	(337) 519-7709
Fujio Pele	Cathodic Protection Specialist	(509) 531-6749
Chris Riggins	Operator	(509) 543-6101

**Concerns:** Tank #12 at the Pasco Terminal was inspected by a certified API 653 Inspector for an out-of-service inspection in September 2011. In the inspection report, the inspector recommended that additional venting was needed. The tank has been in service since 1951 with no reported problems. After further inquiry about this issue during the field inspection, the Chevron Tank Specialist Eddie McClain contacted the inspector. The inspector stated that the recommendation was only his personal opinion and not a recommendation to install additional venting. The inspector has since revised the inspection report. Chevron's Tank Specialist should do a better job in documenting what actions have been taken following the release of the inspection report.

**Follow up on the history of prior offenses that are still open:**

Prior Offenses (for the past 5 years)		
CPF #	What type of open enforcement action(s)?	Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)

**Probable Violations/Concerns:**

See PHMSA findings.

**Recommendations:**

Maintain normal inspection cycle.

**Comments:** None

**Attachments:**

Field Data Collection Form

Version Date: 5/5/08

**Field Data Collection**  
(2012 Integrated Inspection)

**Company:** Chevron Pipe Line Company

**Unit:** Pipeline Pasco (Unit #5145) & Breakout Tanks (Unit #55935)

**Breakout Tanks, Pipe-to-Soil Potential Readings, Rectifiers and Mainline Valves (MLV)**

<b>Date</b>	<b>Location</b>	<b>Pipe (Volts) Power On</b>	<b>Pipe (Volts) Power Off</b>	<b>Casing (Volts)</b>	<b>Comments</b>
7/10/2012	Breakout tanks T-1, 2, 6, 7, 9, 18 & 4502 at Pasco Terminal  The 6" incoming line from Boise to the terminal  The 6" outgoing line to Spokane	-2.513  -2.144  -1.975			All tanks inspected were in good condition. The few isolated paint failures on tank shell were repainted during the field inspection.
7/10/2012	Walla Walla Main Line Valve (MLV) station  Rectifier  6" line				The MLV was completely closed then completely opened by manual & by remote from Houston.  Rectifier DC output: 30.41 V; 35.48 A
7/11/2012	Outside Spokane Terminal (Regal Road Compound) at MP 705.31 MLV	-0.982			The MLV was not operated as the line was delivering product. The bond to Avista was tested and was fine.
7/11/2012	Spokane Terminal  6" incoming line	-2.300			Breakout tank #5504 was inspected and was in good condition.

7/11/2012	Spokane River crossing suspended span  6" MLV & check valve on north side of river	-1.598			Good signs. The painting on the exposed pipe appeared to be good.
7/11/2012	Fairchild Air Force Base  6" line test station outside fence gate	-1.288			The surge relief tank (breakout tank) is a horizontal tank and it appeared to be in good condition.
7/11/2012	Ritzville Rectifier at MP 629  At road crossing	-2.016		-0.327	Rectifier DC output: 53.35 V; 14.7 V
7/11/2012	Kahlotus main line valve (MLV) station with a check valve  Downstream of MLV Upstream of MLV	-1.175 -1.307			There were several bullet holes on the sign. Hunters used the sign for target practice.
7/12/2012	Crossing under Highway 12 to Walla Walla	-1.548		-0.460	
7/12/2012	Walla Walla solar panel under Florida Power wind mills	-1.865			Rectifier DC output: 21.17 V; 7.29 A
7/12/2012	Burbank main line valve (MLV) station 8" idle line 6" active line	-1.167 -1.063			The 8" idle line is packed with nitrogen at 39 psig.
7/12/2012	At MP 576.6	-1.265			
7/12/2012	Road PH 15 at MP 593.2 toward Kahlotus	-1.193		-0.233	
7/12/2012	Road PH 15 at MP 597.3 toward Kahlotus	-1.000		-0.177	

Report Filters: Results: Unsat, Concern

Report Generated: 12/31/2012 for David Mulligan

## Inspection Information

Inspection Name Chevron Pipe Line Co  
 Status ACTIVE  
 Start Year 2011  
 System Type HL  
 Inspection Type INTEGRATED  
 Protocol Set ID INTEGRATED.HL.2011.01

Operator(s) CHEVRON PIPE LINE CO (2731)  
 Lead Claude E Allen  
 Team Members Jerry Davis, Huy Nguyen, Kuang Chu,  
 David Mulligan  
 Supervisor Terrence (Terry) Larson  
 Director Chris Hoidal

Submit Date	
Review Started Date	
Reviewer	
Review Complete Date	
Approver	
Approval Date	

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset ID	Planned	Required	Inspected	Total Required	% Complete
1.	UNIT 235	BOISE AREA	unit	235	393	393	393	393	100.0%
2.	UNIT 43765	NORTH POWDER, OR TO WA STATE LINE	unit	43765	393	393	393	393	100.0%
3.	UNIT 9735	POCATELLO AREA	unit	9735	393	393	393	393	100.0%
4.	UNIT 3875	SALT LAKE AREA	unit	3875	394	394	394	394	100.0%
5.	UNIT 55935	WA-UTC / BREAKOUT TANKS	unit	55935	393	393	393	393	100.0%
6.	UNIT 5145	WA-UTC/PASCO AREA	unit	5145	393	393	393	393	100.0%

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

## Plans

#	Plan Assets	Focus Directives	Topical Modules/Sub-Modules	Qst Type(s)	Extent	Notes
1.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	TD.ATM, TD.COAT, TD.CP, TD.ICP, TD.SCC	O, P, R, S	Confirm	
2.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	RPT, SRN	O, P, R, S	Detail	
3.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	AR.IL	P, R	Confirm	
4.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	AR.OT	P, R	Confirm	
5.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	AR.PTI	P, R	Confirm	
6.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	MO.LO	O, P, R, S	Confirm	
7.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	CR.SCADA	P, R	--	
8.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	CR.CRM	P, R	--	
9.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	AR.RC	P, R	Confirm	
10.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	AR.IL.ASSESSSCHEDULE.R	O, P, R, S	Detail	
11.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	AR.RMP	P, R	Confirm	
12.	UNIT 43765, UNIT 9735, UNIT 235,	n/a	CR.LD	P, R	Detail	

#	Plan Assets	Focus Directives	Topical Modules/Sub-Modules	Qst Type(s)	Extent	Notes
	UNIT 55935, UNIT 3875, UNIT 5145					
13.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	EP.ERL.ACCIDENTANALYSIS.R	P, O, R, S	Detail	
14.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	MO.LO.ABNORMALREVIEW.R	O, P, R, S	Detail	
15.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	AR.IL.METHOD.R	P, R		
16.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	MO.LM	O, P, R, S	Confirm	
17.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	FS	O, P, R, S	Confirm	
18.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	MO.LM.VALVEMAINT.O	O, P, R, S	Detail	
19.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	DC.MO	O, P, R, S	Detail	
20.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	DC.TQ	O, P, R, S	Detail	
21.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	EP.ERL.LIAISON.R	O, P, R, S	Detail	
22.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	FS.FG.FIREPROT.P	O, P, R, S	Detail	
23.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	MO.LM.PRESSREGTEST.O	O, P, R, S	Detail	
24.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	MO.LM.PRESSREGTESTHVL.R	P	Confirm	
25.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	TD.CP	O, P, R, S	Detail	
26.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	TD.SCC.SCCASSESS.R	O, P, R, S	Detail	
27.	--	n/a	TQ	P	Confirm	
28.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	TQ.QU.CONTROLLER.O	O, P, R, S	Detail	
29.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	TQ.OQ.NONQUALIFIED.O	O, P, R, S	Detail	
30.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	ALO.TQ	O, P, R, S	Confirm	
31.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	TQ.OQ.OQPLAN.P	O, P, R, S		
32.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	PD.OC	O, P, R, S	Confirm	
33.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	TQ.OQ	O, P, R, S	Confirm	
34.	--	n/a	TQ.QU	O, P, R, S		
35.	--	n/a	TQ.TR	O, P, R, S		
36.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	PD.RW.PATROL.R	O, P, R, S	Detail	
37.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	PD.SN.VISIBLE.O	P	Detail	
38.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	PD.OC.TPDONECALL.P	O, P, R, S	Detail	
39.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	PD.OC.ONECALL.O	O, P, R, S	Detail	
40.	UNIT 43765, UNIT 9735, UNIT 235,	n/a	EP.EPO, EP.ERL, EP.ETR	O, P, R, S	Confirm	

#	Plan Assets	Focus Directives	Topical Modules/Sub-Modules	Qst Type(s)	Extent	Notes
	UNIT 55935, UNIT 3875, UNIT 5145					
41.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	IM.CA	O, P, R, S		Detail
42.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	IM.HC	O, P, R, S		Confirm
43.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	IM.PM	O, P, R, S		Detail
44.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	IM.QA	O, P, R, S		Detail
45.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	IM.RA	O, P, R, S		Detail
46.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	PD.PA	O, P, R, S	--	
47.	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	n/a	ALO	O, P, R, S		Detail
48.	UNIT 3875	n/a	MO.LO.OMHISTORY.R	O, P, R, S		Detail

## Plan Implementations

#	Activity Name	SMART Act#	Modules/Submodules	Assets	Qst Type(s)	Planned	Required	Inspected	Required Total % Complete
1.	Pre-plan	133363	RPT, SRN	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	all types	888	888	888	100.0%
2.	Houston	133363	ALO, AR, CR, DC, EP, FS, IM, MO, PD, TD, TQ	UNIT 43765, UNIT 9735, UNIT 235, UNIT 55935, UNIT 3875, UNIT 5145	P, R	1153	1153	1153	100.0%
3.	North Powder, OR, 43765	139516	all planned questions	UNIT 43765	O, R	187	187	187	100.0%
4.	WUTC-Pasco Area, 5145	141575	ALO, AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ	UNIT 5145	O, R	187	187	187	100.0%
5.	WUTC-BOTanks, 55935	140855	ALO, AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ	UNIT 55935	O, R	187	187	187	100.0%
6.	Salt Lake Area, 3837	139191	ALO, AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ	UNIT 3875	O, R	188	188	188	100.0%
7.	Pocatello Area, 9735	139193	ALO, AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ	UNIT 9735	O, R	187	187	187	100.0%
8.	Boise Area, 235	139270	ALO, AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ	UNIT 235	O, R	187	187	187	100.0%

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

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

## Results (Unsat, Concern values, 14 results)

1. Question Result, ID, Concern, ALO.FS.BOVENT.O, 195.264(c)  
References

Question Text *Is normal/emergency relief venting and pressure/vacuum-relieving devices installed on aboveground breakout tanks after October 2, 2000 adequate?*

Assets Covered UNIT 55935

Issue Summary Tank #12 at the Pasco tank farm was inspected by a certified API 653 Inspector for an out-of-service inspection in September, 2011. In the inspection report, the inspector recommended that additional venting was needed. The tank has been in service since 1951 with no reported problems. After an inquiry about this issue during the field inspection, the Chevron Tank Specialist Eddie McClain contacted the inspector. The inspector stated that the recommendation was only reflecting his personal opinion and not a recommendation to install additional venting. The inspector has since revised the inspection report. Chevron's Tank Specialist should do a better job in documenting what actions have been taken following the release of the inspection report, and the reasons for not taking actions recommended by the certified inspector.

2. Question Result, ID, Concern, ALO.PROT9.CORRECTION.O, 195.501 (195.509)  
References

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

Assets Covered UNIT 235

Issue Summary Chevron's OQ plan has not been fully reviewed since 2005

3. Question Result, ID, Concern, ALO.TD.CPCURRENT.O, 195.573(c)  
References

Question Text *Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*

Assets Covered UNIT 9735

Issue Summary The rectifier at Rock Creek needs to be repaired. During the field visit, a wildfire was burning at this rectifier location and firefighters were actively working. The rectifier power was turned off. The next day, we revisited the rectifier and observed the internal wiring was charred and not operational. Low P/S readings in the vicinity were observed due to this rectifier being off line.

Inspection Team Notes The rectifier at Rock Creek needs to be repaired. During the field visit, a wildfire was burning at this rectifier location and firefighters were actively working. The rectifier power was turned off. The next day, we revisited the rectifier and observed the internal wiring was charred and not operational. Low P/S readings in the vicinity were observed due to this rectifier being off line.

4. Question Result, ID, Concern, ALO.TD.CPBO.O, 195.573(d)  
References

Question Text *Are cathodic protection monitoring tests performed correctly on breakout tank bottoms?*

Assets Covered UNIT 9735

Issue Summary Low CP levels were observed on relief tank #902 at the Pocatello terminal. At the time of inspection, the tank to soil readings were: -.830 Volts & -.804 Volts. The rectifier located at this terminal was a three-in-one rectifier split to protect the following: Pocatello mainline lateral, tanks, UPPR lateral. CP technician will investigate and correct as necessary. CP levels at the time of the previous annual survey showed adequate protection.

Inspection Team Notes Low CP levels were observed on relief tank #902 at the Pocatello terminal. At the time of inspection, the tank to soil readings were: -.830 Volts & -.804 Volts. The rectifier located at this terminal was a three-in-one rectifier split to protect the following: Pocatello mainline lateral, tanks, UPPR lateral. CP technician will investigate and correct as necessary. CP levels at the time of the previous annual survey showed adequate protection.

5. Question Result, ID, Concern, AR.IL.ILIINTEGRATION.P, 195.452(g)  
References

Question Text *Is the process for integrating ILI results with other information adequate?*

Assets Covered UNIT 235, UNIT 3875, UNIT 43765, UNIT 5145, UNIT 55935, UNIT 9735

Issue Summary Team has concerns with operator relying on vendor data to integrate corrosion related features to long seam. Also we are concerned in how a wrinkle bend is discovered from the ILI data. Communicate these two concerns during the exit interview, no violation.

Standard Issues E

6. Question Result, ID, Concern, AR.IL.ILIANALYSIS.R, 195.452(h)(1)  
References

Question Text *Do ILI results and remediation project records indicate that analysis of the ILI data and other information was adequate to identify anomalies requiring remediation?*

Assets Covered UNIT 235

Issue Summary There was an accident on the Oil Line at MP 198.1 due to corrosion at a holiday near the Hansen rectifier (Twin Falls, Hansen, ID, April 26, 2010). Interview of Syed Hussain: cause not due to CP problems. Actions taken: culvert over PL was removed, negative ground cables from rectifier was installed to both pipes (bond between #1 and #2 removed), also ACVG, stray current survey, CIS performed. Speculation by Syed Hussain: corrosion may due to farmer accidentally spilling highly-corrosive, liquid fertilizer at accident site. Mark Hildebrand asked the vendor (Rosen, MFL) to review the data--conclusion: there was no metal loss in 2007. Concerns: Per accident report, MP 198.1 is in a "could affect area." The fact that the 3/7/07 ILI did not indicate metal loss, and that there is no recommended remedial action to prevent similar corrosion.

Inspection Team Notes There was an accident at MP 198.1 due to corrosion at a holiday near the Hansen rectifier (Twin Falls, Hansen, ID, 4/26/2010). Interview of Syed Hussain: cause not due to CP problems. Actions taken: culvert over PL was removed, negative ground cables from rectifier was installed to both pipes (bond between #1 and #2 removed), also ACVG, stray current survey, CIS performed. Speculation by Syed Hussain: corrosion may due to farmer spilling highly-corrosive, liquid fertilizer at accident site. Concern for MP 198.1: the fact that the 3/7/07 ILI did not indicate the metal loss of almost 100%. Mark Hildebrand asked the vendor (Rosen, MFL) to review the data--conclusion: there was no metal loss in 2007. I have requested a final report of actions taken by CPL, and conclusion.

7. Question Result, ID, References Unsat, AR.RMP.PIPECONDITION.R, 195.404(c)(1) (195.404(c)(2))

Question Text *From the review of the results of integrity assessment and remediation projects and/or field observation, do repair records document all information needed to understand the conditions of the pipe and its environment and provide the information needed to support the Integrity Management risk model?*

Assets Covered UNIT 235

Issue Summary No final Root Cause Analysis completed for accident due to external corrosion at MP 198.1

Additional Comments

Decision

8. Question Result, ID, References Concern, DC.MO.ICEXAMINE.R, 195.589(c) (195.579(c); 195.579(a))

Question Text *Do records indicate removed pipe examined for evidence of internal corrosion?*

Assets Covered UNIT 235, UNIT 3875, UNIT 43765, UNIT 5145, UNIT 55935, UNIT 9735

Issue Summary Several pipe exposure records the team reviewed stated No for internal corrosion. Since these pipe exposure repairs did not include a cutout of the pipe to observe internal corrosion, the record should have stated N/A or Not exposed under the internal corrosion portion of the record.

9. Question Result, ID, References Concern, EP.ERL.ACCIDENTANALYSIS.R, 195.402(a) (195.402(c)(5))

Question Text *Do records indicate pipeline accidents were analyzed to determine their causes?*

Assets Covered UNIT 235

Issue Summary Since Sept 2009, accidents were at MP 69.5 (Corrine, 12/17/09), MP 198.1 (Twin Falls, Hansen, 4/26/2010), and MP 237.4 (Crows Nest Rd, ID, 3/31/11). Reviewed 7001 forms and Root Cause Analysis in Houston and in Boise. The annual CP surveys for 2009, 2010, and 2011 are missing the P/S reading for the CP test station at MP 198.1, and in 2009 the US and DS test stations indicate minimal "P/S potentials. We requested a final report of actions taken by CPL for the accident at MP 198.1. Concerns: Per accident report, MP 198.1 is in a "could affect area." It is more than two years after the accident and there is no final report of actions taken by CPL, root cause analysis, and possible remedial actions.

Inspection Team Notes Since Sept 2009, accidents were at MP 69.5 (Corrine, 12/17/09), MP 198.1 (Twin Falls, Hansen, 4/26/2010), and MP 237.4 (Crows Nest Rd, ID, 3/31/11). Reviewed 7001 forms and Root Cause Analysis in Houston and in Boise. Concern for MP 198.1: the fact that the 2007 ILI did not indicate the metal loss of almost 100%

10. Question Result, ID, References Concern, IM.QA.RECORDS.R, 195.452(l) (195.452(b)(6); 195.452(c)(2))

Question Text *From a review of records, are record keeping methods being performed as required?*

Assets Covered UNIT 235, UNIT 3875, UNIT 43765, UNIT 5145, UNIT 55935, UNIT 9735

Issue Summary The team was concerned some records for dig/pipe repairs were not in the proper folder when viewed online during the Houston inspection. When trying to view SCC investigation digs, records did not appear to be complete even though they were performed more than a year ago. Specifically the reports for MP 117.7, MP 280.53, and MP 300.06.

Standard Issues E : 195.452(l)

11. Question Result, ID, Concern, IM.RA.RAFACILITY.R, 195.452(f)(3) (195.452(g))  
References

Question Text *Has the analysis of risk of facilities been performed as required?*

Assets Covered UNIT 235, UNIT 3875, UNIT 43765, UNIT 5145, UNIT 55935, UNIT 9735

Issue Summary The team is concerned the 2nd phase of the risk analysis for facilities is not scheduled until 2013.

Standard Issues E : 195.452(l)

12. Question Result, ID, Concern, MO.LO.OMHISTORY.R, 195.404 (195.9; 195.402(c)(1))  
References

Question Text *Do records indicate current maps and records of its pipeline systems are maintained and made available as necessary?*

Assets Covered UNIT 3875

Issue Summary Alignment sheets did not show where both Kern River lines crossed CPL lines in the SLC terminal. Old alignment sheets are kept by operations staff. Staff must periodically discard old sheets and use the latest alignment sheets.

Inspection Team Notes Alignment sheets did not show where both Kern River lines crossed CPL lines in the SLC terminal. Old alignment sheets are kept by operations staff. Staff must periodically discard old sheets and use the latest alignment sheets.

13. Question Result, ID, Concern, TD.CP.MONITORCRITERIA.R, 195.589(c) (195.571)  
References

Question Text *Do records document that CP monitoring criteria used was acceptable?*

Assets Covered UNIT 3875, UNIT 9735

Issue Summary CPL does not have all rectifiers equipped with interrupters. Instant off readings are not captured on a regular basis. CPL is in the process of installing interrupters on rectifiers in areas of concern.

14. Question Result, ID, Unsat, TD.CP.ISOLATE.R, 195.589(c) (195.575(a); 195.575(b); 195.575(c); 195.575(d))  
References

Question Text *Do records document adequate electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered UNIT 235

Issue Summary No records of results of isolation tests at custody transfer electrical insulators at Holly Energy, Boise Products, United Oil, Tesoro, and Idaho PL. Casings and other isolation areas is OK.

Additional Comments

Decision

**Acceptable Use:** Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.