**Operator and General Audit Information**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Company:** | **Name:** | | | |
|  | | | |
| **Mailing and Official Address (If different):** | | | |
|  | | | |
| **Doing Business as or Affiliation:** | | | |
|  | | | |
| **PHMSA Operator Identification (OPID) No.** | |  | | |
| **LA DNR Pipeline Number (PL Number)** | |  | | |
| **Unit ID Number/ Unit Name inspected** | |  | | |
| **Operator’s Local Address:** |  | | **Lead Inspector:** |  |
| **Attending Inspectors:** |  |
| **Dates of Inspection:** |  |

**Company Representatives Participating**

|  |  |
| --- | --- |
| **Key Persons** | **Name / Title / Mailing Address / Phone / Email** |
| **Primary Operator or Representative Interviewed** |  |
| **Others Interviewed, Providing Information or Present during the Inspection** |  |
|  |
|  |

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**Integrity Management - High Consequence Areas**

**1. IMP High Consequence Areas HCA Identification**Does the process require the identification of HCA-affecting pipe segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary? (Procedures)

**195.452(f) (1), 195.452(a), 195.452(d)(3), 195.452(b)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. IMP High Consequence Areas HCA Identification**Do records indicate that locations and boundaries of HCA-affecting pipe segments are correctly identified and maintained up-to-date? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(a), 195.452(b)(2), 195.452(d)(3), 195.452(j)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. IMP High Consequence Areas HCA Identification**Are locations and boundaries of pipe segments that can affect HCAs correctly identified and maintained up-to-date in accordance with the program? (Observation)

**195.452(b)(5), 195.452(a), 195.452(b)(2), 195.452(f)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. IMP High Consequence Areas Direct Intersect Method and Direct Intersect Exceptions**Does the process include all locations where pipeline segments directly intersect a high consequence area? (Procedures)

**195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. IMP High Consequence Areas Direct Intersect Method and Direct Intersect Exceptions**Do records indicate that all locations where a pipeline segment is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate technical justification is provided? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**6. IMP High Consequence Areas Release Locations and Spill Volumes**Does the process include methods to determine the locations and volume of potential commodity releases? (Procedures)

**195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**7. IMP High Consequence Areas Release Locations and Spill Volumes**Do records indicate that identified release locations and spill volumes are consistent with the documented process? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**8. IMP High Consequence Areas Overland Spread of Liquid Pool**Does the process include an analysis of overland spread of hazardous liquids to determine the extent of commodity spread and its effects on HCAs? (Procedures)

**195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**9. IMP High Consequence Areas Overland Spread of Liquid Pool**Do records indicate that the analysis of overland spread is consistent with the documented process? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**10. IMP High Consequence Areas Water Transport Analysis**Does the process include the analysis of water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs? (Procedures)

**195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**11. IMP High Consequence Areas Water Transport Analysis**Do records indicate that water transport analysis is consistent with the documented process? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**12. IMP High Consequence Areas Air Dispersion Analysis**Does the process include the analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs? (Procedures)

**195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**13. IMP High Consequence Areas Air Dispersion Analysis**Do the records indicate that the analysis of air dispersion of vapors is consistent with the documented process? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**14. IMP High Consequence Areas Identification of Segments that Could Indirectly Affect an HCA (Buffer Zone)**Does the process include all locations of pipeline segments that do not intersect, but could indirectly affect, an HCA (buffer zone)? (Procedures)

**195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**15. IMP High Consequence Areas Identification of Segments that Could Indirectly Affect an HCA (Buffer Zone)**Do the records indicate that endpoints of pipeline segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**16. IMP High Consequence Areas Timely Completion of Segment Identification**Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation? (Procedures)

**195.452(f)(1), 195.452(b)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**17. IMP High Consequence Areas Timely Completion of Segment Identification**Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation? (Records)

**195.452(l)(1)(ii), 195.452(f)(1), 195.452(b)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **18. IMP High Consequence Areas Timely Development of IM Program** Was a written IM program in place for Category 3 pipelines? (Procedures) |
| **195.452(b)(1) (195.12;195.452(a)(3))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **19. IMP High Consequence Areas Timely Development of IM Program** Was a written IM program in place for Category 3 pipelines? (Records) |
| **195.452(l)(1)(ii) (195.12;195.452(a)(3))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Integrity Management - Risk Analysis**

**1. Risk Analysis Input Information**Are field conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information? (Observation)

**195.452(b)(5), 195.452(f)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Risk Analysis Input Information**Does the process include an analysis and integration of all available information about the integrity of the entire pipeline and the consequences of a failure? (Procedures)

**195.452(f)(3), 195.452(g), 195.452(j)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Risk Analysis Input Information**Do the records indicate that all available information has been integrated into the risk analysis? (Records)

**195.452(l)(1)(ii), 195.452(f)(3), 195.452(g), 195.452(j)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Risk Analysis Comprehensiveness of Approach**Does the process include methodology for evaluating risk to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments? (Procedures)

**195.452(f)(3), 195.452(g), 195.452(j)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. Risk Analysis Results**Do the records indicate that the results of the risk analysis process are useful for drawing conclusions and insights for decision making? (Records)

**195.452(l)(1)(ii), 195.452(f)(3), 195.452(g), 195.452(j)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**6. Subdivision of Pipeline Segments for Risk Analysis Purposes**Does the risk analysis process consider and incorporate the variation in risk factors along the pipeline such that segment-specific risk results and insights are obtained? (Procedures)

**195.452(f)(3), 195.452(g), 195.452(j)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**7. Risk Analysis Comprehensiveness of Approach**Do the records indicate the evaluation of the methodology(ies) used for evaluating risks to HCAs and the integration of all relevant risk factors and all available information when evaluating pipeline segments? (Records)

**195.452(l)(1)(ii), 195.452(f)(3), 195.452(g), 195.452(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Assessment and Repair – External Corrosion Direct Assessment (ECDA)**

**1. Qualification of Operator/Vendor Personnel Who Evaluate ECDA Results**From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform? (Observation)

**195.505, 195.452(b)(5), 195.452(f)(8), 195.555**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Qualification of Operator/Vendor Personnel Who Evaluate ECDA Results**Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria? (Procedures)

**195.505, 195.452(f)(8), 195.555**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Qualification of Operator/Vendor Personnel Who Evaluate ECDA Results**Do the records indicate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform? (Records)

**195.507, 195.452(l)(1), 195.555**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. ECDA Plan**Is there a process in place for conducting ECDA? (Procedures)

**195.588(b)(1), 195.588(b)(2) - (5), 195.452(f)(5), 195.452(j)(5)(iii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. ECDA Pre-Assessment**Do the records indicate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3? (Records)

**195.589(c), 195.588(b)(2), 195.452(l)(1)(ii), 195.452(j)(5)(iii), 195.452(f)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**6. Integration of ECDA Results with Other Information**Does the process include integrating ECDA results with other information? (Procedures)

**195.452(f)(3), 195.452(g), 195.588(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**7. Integration of ECDA Results with Other Information**Do the records indicate that the operator integrated other data/information when evaluating data/results? (Records)

**195.452(l)(1)(ii), 195.452(f)(3), 195.452(g), 195.588(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**8. ECDA Region Identification**Do the records indicate that the operator identified ECDA Regions? (Records)

**195.589(c), 195.588(b)(2)(ii), 195.588(b)(3), 195.588(b)(5)(ii), 195.452(l)(1)(ii), 195.452(f)(5) 195.452(j)(5)(iii), 195.588(b)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**9. ECDA Indirect Examination**Do the records indicate that the ECDA indirect inspection process complied with NACE SP0502-2010? (Records)

**195.589(c), 195.588(b)(3), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**10. ECDA Direct Examination**Do the records indicate that excavations, direct examinations, and data collection were performed in accordance with NACE SP0502-2010, Section 5? (Records)

**195.589(c), 195.588(b)(4), 195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5)(iii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**11. ECDA Direct Examination**Were ECDA direct examinations conducted in accordance with the plan? (Observation)

**195.588(b)(4), 195.588(b)(1), 195.452(b)(5), 195.452(f)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**12. Quality of ECDA Data Analysis**Do the records indicate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely? (Records)

**195.452(l)(1)(ii), 195.452(g), 195.452(f)(3), 195.452(j)(5)(iii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**13. ECDA Change Control**Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan? (Procedures)

**195.588(b)(4)(iii), 195.452(f)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**14. ECDA Change Control**Do the records indicate that changes in the ECDA plan have been implemented and documented? (Records)

**195.589(c), 195.588(b)(4)(iii), 195.452(l)(1)(ii), 195.452(f)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**15. ECDA Post-Assessment**Do the records indicate that the requirements for post assessment were implemented? (Records)

**195.589(c), 195.588(b)(5), 195.452(l)(1)(ii), 195.452(f)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Assessment and Repair - Stress Corrosion Cracking Direct Assessment (SCCDA)**

|  |
| --- |
| **1. Qualification of Personnel Who Conduct SCCDA** Does the process require that operator and vendor personnel, including supervisors, who apply SCCDA methodology and/or review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria? (Procedures) |
| **195.588(c) (195.452(f)(5);195.555)** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

|  |
| --- |
| **2. Qualification of Personnel Who Conduct SCCDA** Do the records indicate that operator/vendor personnel, including supervisors, who apply SCCDA methodology and/or conduct assessments or review assessment results, are qualified for the tasks they perform? (Records) |
| **195.507 (195.452(l)(1)(ii);195.588(c);195.555)**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

|  |
| --- |
| **3. SCCDA - The Plan** Where operator uses direct assessment on an onshore pipeline to evaluate the effects of stress corrosion cracking, does the operator have a Stress Corrosion Cracking Direct Assessment (SCCDA) Plan that includes all the requirements of 195.588(c) and all the requirements and recommendations of NACE SP0204-2008 (IBR)? (Procedures) |
| **195.588(c) (195.452(f)(5))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **4. SCCDA - Pre-Assessment (Data Collection and Evaluation)** Do the records indicate that data was collected and evaluated / integrated in accordance with the Pre-Assessment data gathering and integration requirements? (Records) |
| **195.589(c) (195.452(l)(1)(ii);195.588(c);195.452(g))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| **5. SCCDA - Indirect Inspections** Do the records indicate that the operator conducted Indirect Inspections via aboveground or other types of measurements, in accordance with NACE SP0204-2008, Section 4? (Records) |
| **195.589(c) (195.452(l)(1)(ii);195.588(c))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| **6. SCCDA - Remediate & Mitigate** Do the records indicate that the operator prioritized and conducted mitigation activities to address locations at which significant SCC has been detected, in accordance with NACE SP0204, Section 6? (Records) |
| **195.589(c) (195.452(l)(1)(ii);195.588(c))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **7.** **SCCDA - Post-Assessment** Do the records indicate that the operator conducted the Post-Assessment Step to determine whether SCC mitigation is required, in accordance with NACE SP0204-2008, Section 6? (Records) |
| **195.589(c) (195.452(l)(1)(ii);195.588(c);195.452(g))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **8. SCCDA - Periodic Reassessment Interval** Do the records indicate that the operator determined a re-assessment interval based on analysis of SCCDA results? (Records) |
| **195.589(c) (195.452(l)(1)(ii);195.588(c))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **9. SCCDA - Determining Effectiveness** Do the records indicate that the operator evaluated the effectiveness of the SCCDA approach used in its SCCDA Plan? (Records) |
| **195.589(c) (195.452(l)(1)(ii);195.588(c))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **10. SCCDA - Performance Observations** From field observations, was SCCDA performed in accordance with the SCCDA plan? (Observation) |
| **195.588(c) (195.505)**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

**Assessment and Repair - Integrity Assessments**

|  |
| --- |
| **1.** **ILI Method for Baseline Assessments (Beginning July 1, 2020)** Beginning July 1, 2020, does the Baseline Assessment Plan include inline inspection tools to assess line pipe based on the range of relevant threats to the pipeline segment? (Procedures) |
| **195.452(f)(2) (195.452(c)(1)(i);195.452(c)(1)(i)(A))**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |
| **2. ILI Method for Baseline Assessments (Beginning July 1, 2020)** For baseline assessments performed on or after July 1, 2020, were the assessments completed using the appropriate assessment method(s)? (Records) |
| **195.452(l)(1)(ii) (195.452(c)(1)(i))**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

**3. IMP Assessment Methods**Does the process specify assessment methods that are appropriate for the pipeline integrity threats? (Procedures)

**195.452(f)(5), 195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**4. IMP Assessment Methods**Do the records indicate that the assessment methods shown in the assessment plan are appropriate for the pipeline specific integrity threats? (Records)

**195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5), 195.452(c)(1)(i)(A), 195.591, 195.588**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **5. IMP Baseline and/or Continual Assessments Prioritized Assessment Schedule** Does the process for assessment include a prioritized schedule in accordance with 195.452(d) for baseline assessments and 195.452 (j) for continual assessments that is based on all the risk factors required by 195.452(e)? (Procedures) |
| **195.452(f)(5) (195.452(j)(3);195.452(j)(5);195.452(e);195.452(g);195.591;195.452(d)(1);195.452(n))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **6. IMP Baseline and/or Continual Assessments Prioritized Assessment Schedule** Do the records indicate that assessments are implemented as specified in the assessment plan? (Records) |
| **195.452(l)(1)(ii) (195.452(b)(5);195.452(c);195.452(d);195.452(f)(5);195.452(j)(3);195.452(j)(5);195.591)** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**7. Qualification of Personnel Who Evaluate Integrity Assessment Results and Perform Information Analysis**Does the process specify qualification requirements for personnel who review and evaluate integrity assessment results and information analysis? (Procedures)

**195.452(f)(8), 195.452(g), 195.452(h)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**8. Qualification of Personnel Who Evaluate Integrity Assessment Results and Perform Information Analysis**Do the records indicate that personnel who review and evaluate integrity assessment results and information analysis are qualified? (Records)

**195.452(l)(1)(ii), 195.452(f)(8), 195.452(g), 195.452(h)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**9. Industry Practices**Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing integrity assessments? (Procedures)

**195.452(f)(5), 195.452(b)(6)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**10. Industry Practices**Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments? (Records)

**195.452(l)(1)(ii), 195.452(b)(6)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Assessment and Repair - In-Line Inspection (Smart Pigs)**

**1. Qualification of Personnel Performing ILI**Does the process identify the qualification requirements for personnel who perform ILI (In Line Inspections)? (Procedures)

**195.452(f)(5), 195.591**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Qualification of Personnel Performing ILI**Do the records indicate that personnel who perform ILI (In Line Inspections) are qualified and certified (where applicable)? (Records)

**195.591, 195.452(l)(1)(ii), 195.452(f)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Qualification of Personnel Who Evaluate ILI Results and Perform Information Analysis**Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis? (Procedures)

**195.452(f)(8), 195.452(g)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Qualification of Personnel Who Evaluate ILI Results and Perform Information Analysis**Do the records indicate that personnel who review and evaluate ILI integrity assessment results and information analysis are qualified? (Records)

**195.452(l)(1)(ii), 195.452(f)(8), 195.452(g)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. ILI Specifications**Does the process include adequate ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization? (Procedures)

**195.452(f)(5), 195.452(h), 195.452(j), 195.591**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**6. ILI Specifications**Do the records indicate that ILI requirements for the qualification of in-line inspection systems, including personnel, equipment, processes, and software utilization were included and followed? (Records)

**195.452(l)(1)(ii) (195.452(f)(5);195.452(h);195.452(j);195.591)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**7. Validation of ILI Results**Does the process include the validation of ILI results? (Procedures)

**195.452(f)(4), 195.452(j)(5)(i), 195.452(h), 195.591**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**8. Validation of ILI Results**Do the records for validating ILI assessment results indicate that the process was implemented? (Records)

**195.452(l)(1)(ii), 195.452(j)(5)(i), 195.452(f)(4), 195.452(h), 195.452(c)(1), 195.591**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**9. Integration of ILI Results with Other Information**Does the process for evaluating ILI results include integration of all available information about the integrity of the pipeline? (Procedures)

**195.452(f)(3), 195.452(g), 195.452(h)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**10. Integration of ILI Results with Other Information**Do the records indicate that the operator integrated other data/information when evaluating ILI tool data/results? (Records)

**195.452(l)(1)(ii), 195.452(g), 195.452(f)(3), 195.452(h)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**11. Compliance with ILI Procedures**Have the ILI Procedures been followed? (Observation)

**195.452(b)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **12. Petitioning the PHMSA Administrator When Lines Cannot be Modified to Accommodate ILI** Beginning July 1, 2020, does the process include provisions to petition the PHMSA Administrator when IM-covered segments cannot be modified to accommodate ILI? (Procedures) |
| **195.402(c)(3) (195.452(n))**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

|  |
| --- |
| **13. Petitioning the PHMSA Administrator when Lines Cannot be Modified to Accommodate ILI** Were petitions filed because pipelines could not be modified to accommodate ILI? (Records) |
| **195.452(n)**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

**Assessment and Repair - Integrity Assessment Via Pressure Test**

**1. Pressure Test Acceptance Criteria and Procedures**Does the process define acceptance criteria for a successful pressure test? (Procedures)

**195.452(f)(5), 195.304, 195.305, 195.306, 195.308, 195.452(j)(5)(ii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Quality and Effectiveness of Corrosion Control Program**Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment? (Procedures)

**195.452(f)(3), 195.452(g)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Conduct of Pressure Tests**Was the pressure test conducted in accordance with the Procedures? (Observation)

**195.452(b)(5), 195.452(c)(1)(i)(b), 195.452(j)(5)(ii), 195.304**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Conduct of Pressure Tests**Do the pressure test records indicate compliance with Part 195, Subpart E? (Records)

**195.310, 195.452(f)(2), 195.452(f)(5), 195.452(c), 195.452(l)(1)(ii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. Quality and Effectiveness of Corrosion Control Program**When pressure testing was used as the integrity assessment method, do the records indicate that the effectiveness of the corrosion control program was documented? (Records)

**195.452(l)(1)(ii), 195.452(f)(3), 195.452(g)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Assessment and Repair - Other Technology**

**1. Other Technology Process**If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe? (Procedures)

**195.452(f)(5), 195.452(c)(1)(i)(D), 195.452(j)(5)(iv)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Other Technology Process**Do the records indicate that the Other Technology integrity assessments were performed in accordance with Procedures and vendor recommendations? (Records)

**195.452(l)(1)(ii), 195.452(j)(5)(iv), 195.452(f)(5), 195.452(c)(1)(i)(D)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Other Technology Process**Has the process for the use of "Other Technology" been followed? (Observation)

**195.452(b)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Qualification Requirements for Personnel Who Evaluate Results of Other Technology Integrity Assessments**Does the process specify qualification requirements for personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology? (Procedures)

**195.452(f)(8), 195.452(j)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. Qualification Requirements for Personnel Who Evaluate Results of Other Technology Integrity Assessments**Do the records pertaining to the selected integrity assessments indicate that personnel who review and evaluate the results of an integrity assessment and information analysis using Other Technology are qualified? (Records)

**195.452(l)(1)(ii), 195.452(f)(8), 195.452(j)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Assessment and Repair - Repair Criteria (HCA)**

**1. Timely Discovery**Does the integrity assessment process define "discovery of condition" and the required time frame for anomalies in a pipeline segment that can affect an HCA? (Procedures)

**195.452(f)(4), 195.452(h)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. IM Schedule**Does the process include developing a prioritized schedule for evaluating and remediating all identified repair conditions consistent with the repair criteria and within the time frames found in 195.452(h)(4)? (Procedures)

**195.452(f)(4), 195.452(h)(3), 195.452(h)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| --- |
| **3. Consideration of Risk Consequence Factors when Scheduling Repairs in IM-Covered Segments** For assets covered by the IM program, does the process require that the risk to life, property, and the environment be considered in prioritizing the correction of conditions? (Procedures) |
| **195.402(c)(3) (195.401(b)(3))**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

**4. Timely Discovery**Do the records indicate that “discovery of condition” results for all anomalies occurred promptly, but no later than 180 days after the completion of the integrity assessment? (Records)

**195.452(l)(1)(ii), 195.452(h)(2), 195.452(f)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. Inclusion of All IM Repair Criteria**Does the process include criteria for remedial action to address integrity issues raised by the assessment methods and information analysis? (Procedures)

**195.452(f)(4), 195.452(h)(1), 195.452(h)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**6. Remedial Actions (IM)**Do records indicate that anomaly remediation and documentation of remediation was performed in accordance with the process? (Records)

**195.452(l)(1)(ii), 195.452(h)(3), 195.452(h)(4), 195.452(b)(5), 195.569**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**7. Inclusion of All IM Repair Criteria**Do records indicate that prompt action was taken to address all anomalous conditions discovered through the integrity assessment or information analysis? (Records)

**195.452(l)(1)(ii), 195.452(f)(4), 195.452(h)(1), 195.452(h)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**8. Remedial Actions (IM)**From an observation of a remediation or repair at an excavation site, are anomaly remediation activities adequate, performed in accordance with the categorized remediation/repair schedule, and documented? (Observation)

**195.452(b)(5), 195.402(a), 195.402(c)(14), 195.422(a), 195.569, 195.589(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**9. Remedial Actions (IM)**Does the process require that remedial actions be performed in a manner that addresses the integrity issues raised by the assessment methods used and information analysis? (Procedures)

**195.452(f)(4), 195.452(h)(1), 195.422(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**10. Pressure Reduction**Does the process for pressure reduction meet the code requirements? (Procedures)

**195.452(f)(4), 195.428, 195.452(h)(1)(i), 195.452(h)(1)(ii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**11. Pressure Reduction**Do the integrity assessment records indicate that the pressure reduction taken was acceptable and promptly implemented? (Records)

**195.452(l)(1)(ii), 195.404(a), 195.404 (b), 195.452(h)(1)(ii), 195.452(h)(4)(i), 195.55(a), 195.56**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**12. IM Schedule**Do the records indicate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(4)? (Records)

**195.452(l)(1)(ii), 195.452(h)(3), 195.452(h)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

|  |
| --- |
| **13. Consideration of Risk Consequence Factors when Scheduling Repairs in IM-Covered Segments** Do records demonstrate that the risk to life, property, and the environment was considered when prioritizing the correction of conditions occurring on assets covered by the IM program? (Records) |
| **195.401(b)(3) (195.452(l)(1)(ii);195.404(c)(1);195.589(c))**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

**14. Crack Remediation Criteria**If the pipeline is susceptible to cracking, does the process include criteria for remedial actions to address integrity issues raised by the assessment method? (Procedures)

**195.452(f)(4), 195.452(h), 195.588(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**15. Crack Remediation Criteria**If the pipeline is susceptible to cracking, do the records indicate that the remedial actions have been documented? (Records)

**195.452(l)(1)(ii), 195.452(f)(4), 195.452(h)(4)(iii)(G), 195.588(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Assessment and Repair - Repair Methods and Practices**

**1. Safety While Making Repair**Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property? (Procedures)

**195.402(c)(14), 195.422(a), 195.452(h)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Safety While Making Repair**Are repairs made in a safe manner and to prevent injury to persons and/or property damage? (Observation)

**195.422(a), 195.402(c)(14), 195.452(h)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Permissible Repair Methods**Does the process identify permissible repair methods for each type of defect? (Procedures)

**195.402(c)(3), 195.452(h)(1), 195.585**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Permissible Repair Methods**From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with Procedures and applicable sections of 49 CFR Part 195? (Records)

**195.404(c)(1), 195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1), 195.401(b)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. Qualification of Personnel Performing Pipeline Repair**From the records review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed? (Records)

**195.505(b), 195.507(a), 195.505(c), 195.452(h)(1), 195.452(b)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**6. Repair Records**Do the repair records document all the information needed to understand the conditions of the pipe and its environment and also provide the information needed to support the Integrity Management program, when applicable? (Records)

**195.404(c)(1), 195.422(a), 195.422(b), 195.452(h)(1), 195.401(b)(1), 195.401(b)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**7. Replacement Components**Were all replaced line pipe and/or components designed and constructed as required by Part 195? (Records)

**195.404(a)(1), 195.422(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**8. Pipe Movements**From a review of selected records, were pipeline movements performed in accordance with 195.424? (Records)

**195.424(a) 195.424(b), 195.424(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**9. Welder Qualification**From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding Procedures? (Records)

**195.214(a), 195.214(b), 195.222(a), 195.222(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**10. Repair of Weld Defects**From the review of the results of integrity assessment and remediation projects, were defects on new welds repaired in accordance with 195.226 or 195.230? (Records)

**195.226(a), 195.226(b), 195.226(c), 195.230(a), 195.230(b), 195.230(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**11. Inspection of Welds**From the review of the results of remediation projects, were new welds inspected and examined in accordance with 195.228 or 195.234? (Records)

**195.228(a), 195.228(b), 195.234(a), 195.234(b), 195.234(c), 195.234(d), 195.234(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**12. Non-Destructive Examination (NDE) of Pipeline for Cracking When Exposed for Repair**Does the process include appropriate NDE method(s) and other information gathering during the evaluation of cracks and cracking? (Procedures)

**195.452(f)(4), 195.452(h)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**13. Non-Destructive Examination (NDE) of Pipeline for Cracking When Exposed for Repair**Do the records indicate that appropriate NDE method(s) were used and other information was gathered related to the evaluation of cracking? (Records)

**195.452(l)(1)(ii), 195.452(f)(4), 195.452(h), 195.404(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Integrity Management - Information Analysis**

|  |
| --- |
| **1. Performing Information Analysis per the Updated Requirements Promulgated October 1, 2019** Beginning July 1, 2020 does the information analysis process include the updated requirements of 195.452(g) (Procedures) |
| **195.452(f)(3) (195.452(g))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| --- |
| **2. Performing Analysis that Identifies Spatial Relationships among Anomalous Information** Does the information analysis identify spatial relationships among anomalous information? (Procedures) |
| **195.452(f)(3) (195.452(g))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| **3. Information Analysis Records using Pipeline Attributes for Identifying Spatial Relationships** Do records indicate that all data elements are used to perform information analysis to identify spatial relationships between anomalous information? (Records) |
| **195.452(l)(1)(ii) (195.452(g))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Integrity Management - Preventive and Mitigative Measures**

**1. P&M Measures - Identification & Evaluation**Does the Integrity Management Program include a process for the identification and evaluation of preventive & mitigative measures (P&M measures), resulting from the risk analysis, to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area (HCA)? (Procedures)

**195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C Section III, API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**2. P&M Measures - Identification & Evaluation**Do records demonstrate that the process of identification and evaluation for Preventive & Mitigative Measures (P&M Measures) has been applied in accordance with the documented process? (Records)

**195.452(l)(1)(ii), 195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C Section VI, API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**3. P&M Measures Actions Implemented**Have preventive and mitigative actions been implemented as described in the records? (Observation)

**195.452(b)(5), 195.452(i)(1), 195.452(i)(2), 195.452(i)(3), 195.452(i)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**4. Mitigative Measure Actions Considered**Do the records indicate that mitigative actions have been considered and implemented? (Records)

**195.452(l)(1)(ii), 195.452(f)(6), 195.452(i)(1), 195.452(i)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**5. Preventive Measure Actions Considered**Do the records indicate that preventive actions have been considered and implemented? (Records)

**195.452(l)(1)(ii), 195.452(f)(6), 195.452(i)(1), 195.452(i)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**6. P&M Measures - Risk Analysis**Does the Integrity Management Program include conducting a risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection? (Procedures)

**195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C Section II, API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**7. P&M Measures - Risk Analysis**Do records demonstrate that an adequate risk analysis of the pipeline segment(s) to identify additional preventive & mitigative actions to enhance public safety or environmental protection was performed? (Records)

**195.452(l)(1)(ii), 195.452(f)(6), 195.452(i)(1), 195.452(i)(2), 195 Appendix C Section VI, API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**8. P&M Measures - Leak Detection Capability Evaluation**Does the Integrity Management Program include a process for the evaluation of leak detection capabilities and modifying, as necessary, to protect the high consequence areas? (Procedures)

**195.452(f)(6), 195.452(i)(3), 195 Appendix C Section III, API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**9. P&M Measures - Leak Detection Capability Evaluation**Do records indicate that all required and other relevant leak detection evaluation factors have been evaluated to ensure the protection of HCAs? (Records)

**195.452(l)(1)(ii), 195.452(f)(6), 195.452(i)(3), 195 Appendix C Section VI, API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**10. P&M Measures - Evaluation for EFRDs**Does the Integrity Management Program include a preventive & mitigative (P&M) measures process that specifically addresses the identification, evaluation, and application of EFRDs to protect high consequence areas in the event of a hazardous liquid pipeline release? (Procedures)

**195.452(f)(6), 195.452(i)(4), 195.452(i)(1), 195.452(i)(2), API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**11. P&M Measures - Evaluation for EFRDs**Do the records demonstrate that all required and other relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate? (Records)

**195.452(l)(1)(ii), 195.452(f)(6), 195.452(i)(4), 195 Appendix C Section VI, API Standard 1160**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**12. P&M Measures - Evaluation for EFRDs (Other Factors)**

Does the process consider the inclusion of OTHER factors in the evaluation of EFRDs? (Procedure)

**195.452(f)(6) (195.452(i)(4); 195.452(i)(1); 195.452(i)(2); API Standard 1160)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**13. P&M Measures - Evaluation for EFRDs (Other Factors)**

Do the records demonstrate that OTHER relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate?

**195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(4); API Standard 1160; 195 Appendix C, Section VI; API Standard 1160)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Integrity Management - Continual Evaluation and Assessment**

**1. IMP Periodic Evaluation**Does the process include requirements for performing continual evaluations of pipeline integrity? (Procedures)

**195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**2. IMP Periodic Evaluation**Do records indicate that periodic evaluations of pipeline integrity are being performed and are on a technically justified frequency? (Records)

**195.452(l)(1)(ii), 195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(2), 195.452(g), 195.452(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **3. Reviewing Risk Factors during the Annual Verification of Existing IM-Covered Segments** Does the segment verification process describe how risk factors used in segment identification are verified annually? (Procedures) |
| **195.452(f)(5) (195.452(j)(2))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **4. Identification of Risk Factors when Annually Verifying Existing IM-Covered Segments** For the annual verification of risk factors, does the process include all risk factors that were used in determining pipeline segments that could-affect an HCA? (Procedures) |
| **195.452(f)(5) (195.452(j)(2))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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| **5. Re-Analyzing Existing IM-Covered Segments Based on Changes to Risk Factors Discovered During the Annual Segment Verification** Does the verification process include re-analyzing segments to validate or re-establish endpoints of HCA segments when risk factors change? (Procedures) |
| **195.452(f)(5) (195.452(j)(2))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **6. Verifying IM Covered Segments** Was annual verification of risk factors used in segment identification completed? (Records) |
| **195.452(l)(1)(ii) (195.452(j)(2))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| --- |
| **7. IMP High Consequence Areas HCA Identification** Are locations and boundaries of pipe segments that can affect HCAs correctly identified, maintained up-to-date, and verified in accordance with the program? (Observation) |
| **195.452(b)(5) (195.452(a);195.452(b)(2);195.452(f)(1);195.452(j)(2))** |

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**8. IMP Continual Evaluation and Assessment Intervals**Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval? (Procedures)

**195.452(f)(5), 195.452(e), 195.452(g), 195.452(j)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**9. IMP Continual Evaluation and Assessment Intervals**Do the records indicate that the assessment intervals are consistent with the risks identified for the pipe segment and the results of previous assessments? (Records)

**195.452(l)(1)(ii), 195.452(f)(5), 195.452(e), 195.452(j)(1), 195.452(j)(3), 195.452(g)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**10. IMP Continual Evaluation and Assessment Methods**Does the process specify assessment methods that are appropriate for the specific integrity threats to the pipe segment? (Procedures)

**195.452(f)(5), 195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**11. IMP Continual Evaluation and Assessment Methods**Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment? (Records)

**195.452(l)(1)(ii), 195.452(f)(5), 195.452(j)(5), 195.452(g), 195.452(c)(1)(i)(A), 195.591**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**12. IMP Continual Evaluation and Assessment Interval Variance Notification**Does the process include methodology for submitting variance notifications to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval? (Procedures)

**195.452(f)(5), 195.452(j)(4), 195.452(m)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**13. IMP Continual Evaluation and Assessment Interval Variance Notification**Do the records indicate that variance notifications been submitted to PHMSA for integrity assessment intervals longer than the 5-year maximum assessment interval? (Records)

**195.452(l)(1)(ii), 195.452(f)(5), 195.452(m), 195.452(j)(4)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Integrity Management - Facilities**

**1. Identification of Facilities that Could Affect an HCA**Does the program include a written process for identification of facilities that could affect an HCA? (Procedures)

**195.452(f)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**2. Identification of Facilities that Could Affect an HCA**Do the records indicate that locations and boundaries of HCA-affecting facilities are correctly identified and maintained up-to-date? (Records)

**195.452(l)(1)(i), 195.452(b)(2), 195.452(d)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**3. Facilities Risk Analysis**Does the process include approaches to identify and evaluate the risks of facilities that can affect HCAs? (Procedures)

**195.452(f)(3), 195.452(g), 195.452(j)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**4. Facilities Risk Analysis**Do the records indicate that the analysis of risk of facilities has been performed as required? (Records)

**195.452(l)(1)(ii), 195.452(f)(3), 195.452(g), 195.452(j)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**5. Facilities Releases that Could Affect an HCA**Does the process include methods to determine the facility locations/scenarios and worst case volume of potential commodity releases? (Procedures)

**195.452(f)(1), 195.452(l)(1)(i)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**6. Facilities Releases that Could Affect an HCA**Do the records indicate that identified release locations and spill volumes at facilities are consistent with the program requirements? (Records)

**195.452(l)(1)(ii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**7. Facilities Releases Spread that Could Affect an HCA**Does the process include an analysis of overland spread & water transport of hazardous liquids to determine the extent of commodity spread from the facility and its effects on HCAs? (Procedures)

**195.452(f)(1), 195.452(l)(1)(i)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**8. Facilities Releases Spread that Could Affect an HCA**Do the records indicate the analysis of overland spread & water transport is consistent with the program/process requirements? (Records)

**195.452(l)(1)(ii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**9. Facilities Releases that Could Affect an HCA - Air Dispersion**Where the facility handles HVLs or Volatile Liquids, does the process include an analysis of the air dispersion of vapors released from the facility to determine effects on HCAs? (Procedures)

**195.452(f)(1), 195.452(l)(1)(i)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**10. Facilities Releases that Could Affect an HCA - Air Dispersion**Where the facility handles HVLs or Volatile Liquids, do the records indicate that the analysis of air dispersion of vapors from the facility is consistent with the process requirements? (Records)

**195.452(l)(1)(ii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**11. Periodic Evaluation of Facilities that Could Affect an HCA**Does the process include requirements for performing continual evaluations of facility integrity? (Procedures)

**195.452(f)(5), 195.452(g), 195.452(j)(1), 195.452(j)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**12. Periodic Evaluation of Facilities that Could Affect an HCA**Do the records indicate that periodic evaluations of integrity at facilities affecting HCAs have been performed? (Records)

**195.452(l)(1)(ii), 195.452(j)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**13. Preventive Measures Considered for Facilities that Could Affect an HCA**Does the process include requirements for identification of facility preventive measures to protect the HCAs? (Procedures)

**195.452(f)(6), 195.452(i)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**14. Preventive Measures Considered for Facilities that Could Affect an HCA**Do the records indicate that facility preventive measures to protect the HCAs have been considered and implemented? (Records)

**195.452(l)(1)(ii), 195.452(i)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**15. Mitigative Measures Considered for Facilities that Could Affect an HCA**Does the process include requirements for identification and implementation of facility mitigative measures to protect the HCAs? (Procedures)

**195.452(f)(6), 195.452(i)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**16. Mitigative Measures Considered for Facilities that Could Affect an HCA**Do the records indicate that facility mitigative measures to protect the HCAs have been considered and implemented? (Records)

**195.452(l)(1)(ii), 195.452(i)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**17. Preventive & Mitigative Measures Implemented for Facilities that Could Affect an HCA**Does an on-site observation provide indications that facility preventive & mitigative measures to protect the HCAs were implemented as proposed? (Observation)

**195.452(i)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Integrity Management - Quality Assurance**

**1. Measuring Program Effectiveness**Does the process for evaluating IM program effectiveness include the elements necessary to conduct a meaningful evaluation? (Procedures)

**195.452(f)(7), 195.452(k)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**2. Measuring Program Effectiveness**Do the records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary? (Records)

**195.452(l)(1)(ii), 195.452(f)(7), 195.452(k)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**3. Record Keeping**Does the process ensure that the records required for the integrity management program are maintained? (Procedures)

**195.402(c)(3), 195.452(l)(1)**

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| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**4. Performance Metrics**Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance? (Procedures)

**195.452(f)(7), 195.452(k)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**5. Performance Metrics**Do the records indicate that performance metrics are providing meaningful insight into integrity management program performance? (Records)

**195.452(l)(1)(ii), 195.452(f)(7), 195.452(k)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**6. Record Keeping**Do the records indicate that the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity? (Records)

**195.452(l)(1)(ii)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Maintenance and Operations - Low-Stress Rural Pipelines**

|  |
| --- |
| **1. Categorizing Rural Low Stress Pipelines** Does the process require that rural low stress pipelines be properly categorized? (Procedures) |
| **195.12(b) (195.12(b)(1);195.12(b)(2);195.12(b)(3);195.452(a))**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | |  |  | | --- | | **2. Categorizing Rural Low Stress Pipelines** Do the records indicate that rural low stress pipelines were properly categorized? (Records)  **195.12(f) (195.12(b)(1);195.12(b)(2);195.12(b)(3);195.452(a))** | | |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | |   **3. Categorizing Rural Low Stress Pipelines** Are locations and boundaries of segments that can affect a USA correctly identified? (Observation) | | **195.12(b) (195.12(b)(1);195.12(b)(2);195.12(b)(3);195.452(a))** | |

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**4. Rural Low Stress Pipelines with Economic Compliance Burden**Where applicable, does the process include reporting of 195.12(d) “economic compliance burden” in accordance with 195.452(m)? (Procedures)

**195.12(d), 195.12(b), 195.452(m)**

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**5. Rural Low Stress Pipelines with Economic Compliance Burden**Where applicable, do the records indicate reporting of 195.12(d) “economic compliance burden” in accordance with 195.452(m)? (Records)

**195.12(f)(2), 195.12(b), 195.12(m)**

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **6. Developing an IM Plan (Low Stress)** Do the records indicate that an IM Plan was developed by the applicable deadline for Low Stress Category 1 and 2 pipeline segments? (Records) |
| **195.452(l)(1)(ii) (195.12(c);195.452(a))** |

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **7. Completing Baseline Assessments (Low Stress)** Does the process require that baseline assessments be completed within the timeframe for the applicable pipeline segment category and within the prioritized schedule based on risk? (Procedures) |
| **195.452(f) (195.12(c);195.452(c))** |

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **8. Completing Baseline Assessments (Low Stress)** Do the records indicate that baseline assessments have be completed within the time frame for the applicable pipeline segment category and within the prioritized schedule based on risk? (Records) |
| **195.452(l)(1)(ii) (195.12(c);195.452(a))** |

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **10. IM Program Applicability to Low Stress Pipelines** Does the Operator have 195.12 Category 1 or Category 2 Low Stress pipelines in rural areas for which the operator must have an integrity management program in compliance with 195.452? (Procedures) |
| **195.452(a) (195.12(c))** |

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **11. IM Program Applicability to Low Stress Pipelines** Do the records indicate that the process to continually carry out the requirements of 195.452 was met? (Records) |
| **195.452(l)(1)(ii) (195.12(c);195.452(a)(4))** |

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **12. Changes in USAs (Low Stress)** Does the process require that changes in USAs be handled in accordance with 195.12(e)? (Procedures) |
| **195.12(e) (195.12(e)(1);195.12(e)(2);195.452(d)(3))** |

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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| **13. Changes in USAs (Low Stress)** Do the records indicate that changes in USAs were handled in accordance with 195.12(e)? (Records) |
| **195.12(f) (195.12(e)(1);195.12(e)(2);195.452(l)(1)(ii))**   |  |  |  |  | | --- | --- | --- | --- | | No Issue | Potential Issue | Not Applicable | Not Checked | |  |  |  |  | | **Notes** | | | | |  | | | | |

**Reporting - Notices and Reporting**

**3. IMP Notifications**Does the process include a requirement for submitting an IMP notification for each of the following circumstances: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)? (Procedures)

**195.452(f)(5), 195.452(j)(4), 195.452(h)(1), 195.452(m)**

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**4. IMP Notifications**Do the records indicate that the operator submitted IMP notification(s) for any of the following circumstances, when it was necessary to do so: A) Unable to Meet Remediation Deadlines, B) Pressure Reductions, C) Use of Other Technology, D) Variance from Five-Year Assessment Intervals (Unavailable Technology), E) Variance from Five-Year Assessment Intervals (Engineering Basis)? (Records)

**195.452(l)(1)(ii), 195.452(m), 195.452(j)(4), 195.452(h)(1), 195.452(c)(1)**

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**Reporting - Regulatory Reporting (Traditional)**

**2. Annual Report IM Inspection Data**Do the records indicate that the Annual Report Part F Data is complete and accurate? (Records)

**195.49**

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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**3. Annual Report IM Assessment Completion Data**Is Annual Report Part G data complete and accurate? (Records)

**195.49**

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| No Issue | Potential Issue | Not Applicable | Not Checked |
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| **Notes** | | | |
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