IDAHO PIPELINE CORPORATION

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September 17, 2019

Via: Electric Mail & USPS

Dustin Hubbard
Director, Western Region PHMSA
12300 W. Dakota Ave., Suite IIO
Lakewood CO 80226

Ref: CPF 5-2018-6016M Order Directing Amendment

Dear Director Hubbard,

On September 5 through 8, and September 18 through 21, 2017 representatives of the Pipelines and Hazardous Materials Safety Administration (PHMSA), inspected Idaho Pipeline Corporation's ((IDPC) procedures for operations and maintenance at IDPC's Boise, Idaho facility. On August 12, IDPC received Order Directing Amendment, dated August 8, 2019 in referenced case CPF 5-2018-6016M. Idaho Pipeline Corporation submits this response to the issues raised in the CPF 5-2018-6016M case.

1. Amend its O&M procedures to include the steps or processes IDPC will follow for the gathering of data needed for reporting accidents in a timely and effective manner, in accordance with § 195, Subpart B.

IDPC Response

In regard to Item #1, IDPC O&M Change # 5, dated August 29, 2019 changed to address the concerns of identifying process of gathering data needed for reporting accidents in a timely and effective manner. Amended procedures in section 1-4 Reporting Accidents, and Safety Related Condition Reporting process designating IDPC Terminal Manager (TM) or designated representative as being responsible for compiling data for reporting accidents and clarifies deadlines for timely reporting.

2. Amend its O&M procedures for the inspection of in-service breakout tanks in accordance with 49 C.F.R. § 195.432(a). At a minimum, IDPC's procedures should include all steps, based on its system, which would be followed to perform routine in-service inspections of breakout tanks.

IDPC Response

In regard to Item #2, IDPC O&M Change # 5, dated August 29, 2019, changes made in section 6, Break Out Tank procedure to include performing routine in-service breakout tank inspections.

3. Establish adequate written procedures for analyzing the causes of pipeline accidents, in accordance with § 195.402(c)(5).

IDPC Response

In regard to Item #3, IDPC O&M change # 5, dated August 29, 2019, procedure changes in section 1.4.6 Accident Reports, clarifying written process used when analyzing the causes of pipeline accidents, and added Appendix A-1, Pipeline Accident Investigation Guide to manual.

4. Establish adequate written procedures for establishing and maintaining liaison with fire, police, and other appropriate public officials to learn the responsibility and resources of each government organization that may respond to a hazardous liquid pipeline emergency and

acquaint the officials with IDPC's ability in responding to a hazardous liquid pipeline emergency and means of communication, in accordance with § 195.402(c)(12).

IDPC Response

In regard to Item #4, IDPC O&M change # 5, dated August 29, 2019, IDPC changed manual to address the concerns of establishing written procedures for establishing and maintaining liaison with fire, police, and appropriate public officials. Written procedure includes on-going face-to-face recurring meetings with first responders in addition to the annual outreach media delivered to stakeholders compliant with IDPC Public Awareness Plan.

5. Amend its O&M procedures for periodically reviewing the work done by its personnel to determine the effectiveness of the procedures used in normal O&M, and take corrective action where deficiencies are found, in accordance with § 195.402(c)(13). Rather than paraphrasing code requirements, IDPC procedures should set forth the steps or processes in which it will achieve compliance specifically for its system. For example, who would perform the review, how often, the method of evaluating the procedure for effectiveness, and documentation of review.

IDPC Response

In regard to Item #5, IDPC O&M change # 5, dated August 29, 2019, IDPC has amended procedure to clarify requirement for TM to perform periodic review of work done by personnel to determine effectiveness of normal operation and maintenance procedures. Change clarifies frequency and methods for conducting and documenting periodic work performed reviews and assigs responsibility to perform review actions to TM or designated representative to take appropriate corrective action taken when determining deficiencies in procedure exist.

6. Amend its emergency procedures to include steps or a process for receiving, identifying, and classifying notices of events which need immediate response by IDPC or notice to fire, police, or other appropriate public officials and communicating this information to appropriate IDPC personnel for corrective action, in accordance with § 195.402(e)(1).

IDPC Response

In regard to Item #6, IDPC O&M change # 5, dated August 29, 2019, IDPC has amended manual to clarify process for receiving, identifying, and classifying notice of events requiring immediate response by IDPC, fire, policy, or other appropriate officials and documents process to communicate emergency operations process to communicate corrective actions to appropriate IDPC personnel.

7. Amend its emergency procedures to include steps or a process for prompt and effective response to a notice of each type of emergency, including fire or explosion occurring near or directly involving a pipeline facility, accidental release of hazardous liquid from a pipeline facility, operation failure causing a hazardous condition, and natural disaster affecting pipeline facilities, in accordance with § 195.402(e)(2).

IDPC Response

In regard to Item # 7, IDPC O&M Change # 5, August 29, 2019 changed O&M section 3 Emergency Operations procedures to include process for prompt and effective response to a notice of each type of emergency, including fire or explosion involving pipeline facilities or occurring near pipeline facility, accidental release of hazardous liquid from pipeline facility, operation failure causing a hazardous condition and natural disaster affecting pipeline facilities.

8. Establish adequate written emergency procedures for having personnel, equipment, instruments, tools and material available, as needed, at the scene of an emergency, in accordance with § 195.402(e)(3).

IDPC Response

In regard to Item # 8, IDPC O&M Change #5, dated August 29, 2019, O&M Section 3 and 4 written emergency procedures changes to clarify procedures for having personnel, equipment, instruments, tools and material available at scene of emergency

9. Establish adequate written emergency procedures for the process of taking necessary action, such as emergency shutdown or pressure reduction, to minimize the volume of hazardous liquid that is released from any section of IDPC's pipeline in the event of a failure, in accordance with § 195.402(e)(4).

IDPC Response

In regard to Item # 9, IDPC O&M Change #5, dated August 29, 2019 written procedure for responding to notice of any emergency requires following steps required by CL-E-01, Emergency Shutdown Procedures. Process shuts down any pumping operations and isolates portion of line associated in the failure event, thus minimizing volume of hazardous liquid released.

10. Establish adequate written emergency procedures on controlling the release of hazardous liquid at an accident scene to minimize the hazards, including possible intentional ignition in the cases of flammable highly volatile liquid, in accordance § 195.402(e)(5)

IDPC Response

In regard to Item # 10, IDPC O&M Change #5, dated August 29, 2019 written procedure for controlling the release of hazardous liquid and minimize possible ignition sources to minimize possible ignition of released flammable liquid.

11. Establish adequate written emergency procedures on how to minimize the public exposure to injury and probability of accidental ignition, in accordance with § 195.402(e)(6)

IDPC Response

In regard to Item # 11, IDPC O&M Change #5, dated August 29, 2019, changes to Section 3 provides written procedure to minimize public exposure to injury and probably of accidental ignition by assisting with evacuation of residents and assisting with halting traffic on road and railroad in the affected area.

12. Amend its emergency procedures to include steps or a process for notifying fire, police, and other appropriate public officials of hazardous liquid pipeline emergencies, and coordinating with them preplanned and actual responses during an emergency, including additional precautions necessary for an emergency involving a pipeline system transporting a highly volatile liquid, in accordance with § 195.402(e)(7)

IDPC Response

In regard to Item # 12, IDPC O&M Change #5, dated August 29, 2019, changes to Section 1, 2, and 3 provides written procedure for notifying fire, police, and other appropriate public officials of hazardous liquid pipeline emergencies and coordinating with them preplanned and actual responses during an emergency

13. Amend its emergency procedures to include steps or a process for providing a post-accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found, in accordance with § 195.402(e)(9).

IDPC Response

In regard to Item # 13, IDPC O&M Change #5, dated August 29, 2019, procedure changes to Section 3 provides written procedure for post-accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action when deficiencies are found.

14. Amend its O&M procedures to include steps or a process for enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 195.55, in accordance with § 195.402(f).

IDPC Response

In regard to Item # 14, IDPC O&M Change #5, dated August 29, 2019, written procedure changes to Sections 1.4 and 3.6 provides for process to enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions subject to reporting.

15. Amend its emergency response training procedures to include steps or a process for how IDPC will conduct a training program to instruct emergency response personnel, in accordance with § 195.403(a)(1) - (5).

IDPC Response

In regard to Item # 15, IDPC O&M Change #5, dated August 29, 2019, written procedure changes to Section 3.5 clarifies process for training program to instruct related assigned responsibilities for emergency response personnel.

16. Amend its emergency response training procedures to include steps or a process on how IDPC will make appropriate changes to the emergency response training program, as necessary, to ensure that the training is effective, in accordance with § 195.403(b)(2)

IDPC Response

In regard to Item # 16, IDPC O&M Change #5, dated August 29, 2019, written procedure changes to Section 1.2 and 3.5 established process to make appropriate changes to provide for an effective emergency response training program.

17. Amend its emergency response procedures to include an explanation of how IDPC will require and verify that its supervisors maintain a thorough knowledge of the emergency response procedures for which they are responsible to ensure compliance, in accordance with § 195.403(c).

IDPC Response

In regard to Item # 17, IDPC O&M Change #5, dated August 29, 2019 written procedure changes to Section 3.4 includes process to require and verify that supervisors maintain through knowledge of emergency response procedures for which they are responsible.

18. Amend its O&M procedures for operating, maintaining, and repairing the pipeline in accordance with § 195.402(c)(3). In particular, IDPC must establish adequate written procedures regarding protection against ignitions for above-ground breakout tanks required by § 195.405(a) and API RP 2003, which is incorporated by reference. In the alternative, IDPC must establish adequate written procedures that explain why compliance with all or certain provisions of API RP 2003 is not that explain why compliance with all or certain provisions of API RP 2003 is not necessary for the safety of a particular breakout tank.

IDPC Response

In regard to Item # 18, IDPC O&M Change #5, dated August 29, 2019, changes to Section 6.8 provide written procedure regarding protection against ignitions for above ground breakout tanks.

19. Establish adequate written procedures for operating, maintaining, and repairing the pipeline in accordance with § 195.402(c)(3) Specifically, IDPC must establish written procedures regarding the review and consideration of potentially hazardous conditions, safety practices, and procedures for above ground breakout tanks found in API Pub 2026, pursuant to S § 195.405(b).

IDPC Response

In regard to Item # 19, IDPC O&M Change #5, dated August 29, 2019, Section 6.9 provides written procedures to review and consider potentially hazardous conditions, safety practices, and procedure for above ground breakout tanks.

20. Amend its written damage prevention program procedures in accordance with § 195.442(a). Specifically, IDPC must clearly define its Damage Prevention Program, and address the regulatory requirements listed in § 195.442

IDPC Response

In regard to Item # 20, IDPC O&M Change #5, dated August 29, 2019, amended Section 5.3 and 5.15 clarifies written Damage Prevention Program and compliance of § 195.442

21. Establish an adequate written Operator Qualification (OQ) program to ensure through evaluation that individuals performing covered tasks are qualified, in accordance with § 195.505(b). Specifically, IDPC must establish a process or procedures for establishing evaluation methods for initial and subsequent qualification, and pass/fail criteria for written test and/or performance evaluations.

IDPC Response

In regard to Item # 21, IDPC O&M Change #5, dated August 29, 2019 section 7 revised to document compliance with regulatory requirements for Operator Qualification Procedures. A process establishing procedures for evaluation methods for initial and subsequent qualification to include pass/fail criterial shown in OQ Plan Change 1, dated January 8, 2012 sections 6.5 and 6.6

22. Establish adequate written OQ program procedures that include provisions to allow individuals who are not qualified pursuant to Part 195, Subpart G, to perform a covered task if directed and observed by an individual who is qualified, in accordance with § 195.505(c).

IDPC Response

In regard to Item # 22, IDPC O&M Change #5, dated August 29, 2019 section 7.4.3 clarified process for an individual not qualified on a covered task to perform covered task when directly observed by an individual qualified on that particular covered task. IDPC OQ Plan Change # 1 dated January 8, 2012 section 6.8 clearly established the process for a qualified person directing and observing non qualified individual performing a covered task.

23. Establish adequate written OQ program procedures that include provisions for communicating changes that affect covered tasks to individuals performing those tasks, in accordance with § 195.505(f).

IDPC Response

In regard to Item # 23, IDPC O&M Change #5, dated August 29, 2019, section 7.4.6 establishes process requiring changes that affect covered task must be communicated to individuals prior to perform associated covered task. IDPC OQ Plan Change # 1 dated January 8, 2012 section 7 documents Management of Change process.

24. Establish adequate written procedures for operating, maintaining, and repairing the pipeline in accordance with § 195.402(c)(3). Specifically, IDPC must amend its corrosion control procedures

for maintaining current records or maps as required by § 195.589(a). IDPC must also establish procedures that require current maps/and or records to show the location of cathodically protected pipelines, cathodic protection facilities (including galvanic anodes, installed at January 28, 2002), and neighboring structures bonded to cathodic protection systems.

IDPC Response

In regard to Item # 24, IDPC O&M Change #5, dated August 29, 2019 amended Section 1.2.2 Maps and Records clarify procedure to maintain current maps and records to require making and maintaining records of cathodic protection facility locations to include galvanic anodes and neighboring structures bonded to cathodic protection system.

IDPC is committed to working with PHMSA to ensure compliance with pipeline safety regulations. PHMSA comments and suggestions are appreciated and my help strengthen IDPC plans and operations. With the volume of changes made addressing PHMSA concerns to IDPC O&M, we will provide excerpts of the O&M section changes for your review.

If you have any question or would like to discuss this matter further, please do not hesitate to contact Robert Wood, National Pipeline Manager, email Robert.Wood@panamericanpipelines.com or (813) 1981-1851 direct number.

Sincerely,

Robert L. Rose

Robert L. Rose
President
Idaho Pipeline Corporation
P.O. Box 35236
Sarasota FL 34242

cc: R. Wood
B. Adams

Ref: Excerpts of IDPC O&M change 5, dated August 29, 2019

1.

1.4 Reporting accidents

1.4.1 IDPC TM or designated representative is required to complete accident reports required in this section. When accident report is required, report will be submitted through at https://portal.phmsa.dot.gov/PHMSAPortal2, ODES 2.0 Forms, Create Reports, Hazard Liquid. Instructions for completing PHMSA F-7000-1 should be read before you begin submission process. PHMSA F-7000-1 and instructions may be obtained from https://www.phmsa.dot.gov/forms/pipeline-forms.

1.4.2 Immediate notice of certain accidents

1.4.2.1 IDPC TM or designated representative must make notification at the earliest practicable moment but not later than one hour after confirmed discovery, of a release of the hazardous liquid release resulting in a reportable accident

1.4.2.2 IDPC TM or designated representative will notify NRC by telephone at 1-800-424-8802, email NRC Watch at NRC@uscg.gov or electronically at http://www.nrc.uscg.mil. Prior to making call obtain the following information that is to be provided when notifying NRC:

- 1.4.2.2.1 Name and address and identification number of the operator (Idaho Pipeline Corporation, OPS ID 8014)
- 1.4.2.2.2 Name and telephone number of the reporter
- 1.4.2.2.3 The location of the failure
- 1.4.2.2.4 The time of the failure
- 1.4.2.2.5 The facilities and personal injuries if any
- 1.4.2.2.6 Initial estimate of amount of product released. If released volume is unknown use calculations of estimated discharges located in IDPC FRP, Figure 1.2. Line section 1 has been identified as Worst-Case Discharge volumes of 118 Bbls, line section 2 has been identified as Worst-Case Discharge volume of 239 Bbls, line section 3 has been identified as Worst-Case Discharge of 109 Bbls, Tank 1 has been identified as Worst-Case Discharge of 4,800 Bbls, and Tank 2 has been identified as Worst-Case Discharge of 4,800 Bbls. Released volume estimate should be updated as appropriate when submitting PHMSA F-7000-1
- 1.4.2.2.7 Other significant facts known that are relevant to the cause or extent of the damages. "Known" is vital, care must be exercised not to speculate on cause or extent of damages.
- 1.4.2.2.8 IDPC TM or designated representative must revise or confirm the initial report when revised estimate of the amount of product release, location of failure, time of failure, estimate number of fatalities and injuries, and other significant facts that are relevant to the cause of the accident or extent of damages within 48 hours after confirmed discovery of an accident. Confirmation is required even if there are no chances or revisions to the initial report.

1.4.6 Accident Reports

1.4.6.1 IDPC TM or designated representative will prepare and submit a PHMSA F 7000-1 Accident Report, if required. The report will be prepared and submitted as soon as practicable but not later than 30 days after discovery of the accident. Refer to PHMSA F 7000-1 Instructions for submission requirements

1.4.6.2 Whenever IDPC becomes aware of any changes or additions to the original report, IDPC must file a supplemental report within 30 days

1.4.6.3 Accident Investigation:

1.4.6.3.1 Reports (except Safety Related Condition Reports) must be submitted electronically unless an alternative method is authorized IAW 49 CFR 195.58(d). IDPC must contact PHMSA at 202-366-8075, or electronically to informationresourcesmanager@dot.gov to make arrangements for submitting a report that is due after request for alternate reporting is submitted but before an authorization or denial is received

1.4.6.3.2 IDPC TM or designated representative will investigate and analyze all maintenance, operator qualification, and inspection documents to determine cause of any accident. If required IDPC will consult with 3rd party to conduct portions of the investigation.

1.4.6.3.3 IDPC TM will utilize Pipeline Accident Investigation Guide, Appendix A-1 of this manual when Analyzing Pipeline Accidents

2.

6.1 Routine In-Service inspections (monthly)

6.1.1 Check for evidence of leaks, shell distortions, signs of settlement, corrosion, condition of foundations, paint coatings, and appurtenances

6.1.2 Check tank vents for obstructions (annually)

3.

1.4.6.3 Accident Investigation:

1.4.6.3.1 Reports (except Safety Related Condition Reports) must be submitted electronically unless an alternative method is authorized IAW 49 CFR 195.58(d). IDPC must contact PHMSA at 202-366-8075, or electronically to informationresourcesmanager@dot.gov to make arrangements for submitting a report that is due after request for alternate reporting is submitted but before an authorization or denial is received.

1.4.6.3.2 IDPC TM or designated representative will investigate and analyze all maintenance, operator qualification, and inspection documents to determine cause of any accident. If required IDPC will consult with 3rd party to conduct portions of the investigation.

1.4.6.3.3 IDPC TM will utilize Pipeline Accident Investigation Guide, Appendix A-1 of this manual when Analyzing Pipeline Accidents

4.

1.11.3 IDPC TM advantages face-to-face opportunities with attendance of the Local Emergency Planning Commission (LEPC), Utility Coordinating Committee (UCC), and face-to-face meetings with local fire, police and other emergency responders to discuss emergency response capabilities with a hazardous liquid pipeline emergency. Records of these meetings will be kept in the Public Awareness File in the office file cabinet

5.

2.1.6 IDPC TM or designated representative will periodically review work performed by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance. This review will be conducted at least once each calendar year, at interval not to exceed fifteen (15) months and should be scheduled prior to annual O&M manual review.

2.1.6.1 Until a second employee is hired, the TM will continue documenting review of procedure effectiveness and any corrective actions taken when determining deficiencies in procedures exist. Once a second employee is hired, IDPC TM will perform and document work performed by personnel to determine the effectiveness of procedures.

2.1.6.2 IDPC TM should consider results of monthly walk around inspection of facility and review of accounting documents when considering effectiveness of the work performed

6.

3.2 RECEIVING REPORT OF AN EMERGENCY

3.2.1 There are several ways that IDPC can be made aware of a leak or an emergency situation, such as

- 3.2.1.1 Pressure gauges indicate low pressure indicating a leak or rupture
- 3.2.1.2 Pipeline Patrol
- 3.2.1.3 Report from landowner, passerby, resident, excavators, etc
- 3.2.1.4 Report from Idaho Air National Guard personnel of a loss of pressure,
- 3.2.1.5 Marathon Operations Control Center, San Antonio, or
- 3.2.1.6 911, emergency responders

3.3 RECEIVING, IDENTIFYING, CLASSIFYING, AND NOTIFYING OF EMERGENCIES.

3.3.1 When an emergency is reported the following items shall be completed

- 3.3.1.1 Record the name and telephone number of the person making the report.
- 3.3.1.2 Determine location and condition of the emergency
- 3.3.1.3 Record time and date emergency was reported
- 3.3.1.4 Use Emergency Checklist E-01, Emergency Shutdown Procedure located in Appendix B of this manual to shut down the pipeline, minimize the pressure on the pipeline system, and minimize the amount of product that could be released
- 3.3.1.5 Notify fire and police departments immediately, Dial 911 as appropriate
- 3.3.1.6 Notify the Facility Supervisor
- 3.3.1.7 If emergency is a release of product, call for assistance to get appropriate work/repair and leak detection equipment dispatched to site. Oil Spill Response Contractors (OSRC) are listed in the Facility Response Plan Appendix C located in the IDPC office library
  - 3.3.1.7.1 Minimize sources of ignition such as motors, electric pumps, open flames etc....

3.3.2 Initial response steps to be taken by on-scene personnel. Evaluate the scene and make a preliminary assessment of the situation

- 3.3.2.1 Approach the spill area from an upwind and/or uphill direction if possible, use personal protective equipment appropriate for the situation
- 3.3.2.2 Until confirmed otherwise, the spill environment must be presumed to be hazardous. That presumption remains until the characteristics of the spilled material have been determined and area has been monitored and evaluated
- 3.3.2.3 If the first IDPC person at the site of spill does not have information and equipment to make the determination, an immediate request for assistance should be made
- 3.3.2.4 Responding IDPC personnel should assist emergency responders (Fire and or Police) in life-saving actions, minimize public exposure, evacuation, roadblocks and traffic control as appropriate

3.3.2.5 TM or designated representative will notify Oil Spill Response Contractor and brief on known status of condition as soon as possible after confirming type and estimated size of emergency. OSRC will mobilize necessary safety, repair, and emergency response equipment to the scene of the emergency as soon as possible. Contact numbers listed in IDPC Facility Response Plan; Appendix C located in IDPC office library.

3.3.2.6 At present time, no rail is within area of IDPC facilities. If in the future, railroad is determined to be in an affected accident area, TM in coordination with on-scene first responders should take appropriate action to notify railroad on situation to halt rail traffic through area until such time area is determined safe.

3.3.3 Incident levels classified by the State of Idaho into four response action levels and appropriate notification requirement

3.3.3.1 Regulatory: A release of a Reportable Quantity or less of regulated hazardous materials that does not require and emergency response. Notification to agencies on regulatory call down list is made by fax or email the following business day

3.3.3.2 Level 1: An incident involving any, public or private sector, response to hazardous materials that can be contained, extinguished, and/or abated using resources immediately available to the responders having jurisdiction. A Level 2 incident presents little risk to the environment and/or public health with containment and clean-up

3.3.3.3 Level 2: An incident involving hazardous materials that is beyond the capabilities of the first responders on the scene and may be beyond the capabilities of the public-sector response agency having jurisdiction. Level 2 incidents may require the services of a State of Idaho Regional Response Team (RRT), or other state/federal assistance. This level may pose immediate and/or long-term risk to the environment and/or public health and could result in a local declaration of disaster

3.3.3.4 Level 3: An incident involving hazardous materials that will require multiple resources that do not exist within the State of Idaho. Level 3 incidents generally pose extreme, immediate, and/or long-term risk to the environment and/or public health.

3.3.4 Notification Matrix: Agencies and Organizations notified shall be based on actual or potential size of spill, and the threat posed as outlined in figure 3.1

7.

3.1.1 FIRE OR EXPLOSION

3.1.1.1 Any fire or explosion directly involving a pipeline facility will be considered an emergency.

3.1.1.2 A fire or explosion that occurs close enough to a pipeline facility to be an immediate threat to the facility will be considered an emergency

3.1.2 Fire Plan

3.1.2.1 IDPC employees will upon reporting for assignment be instructed on the characteristics of petroleum fires, firefighting and the proper use and application of existing firefighting equipment

3.1.2.2 Boise Fire Department will provide firefighting coverage. (Dial 911 to report a fire)

3.1.2.3 An inspection of all firefighting equipment shall be made periodically and recorded

3.1.2.4 The first and most effective method of fighting fires is good effective housekeeping. Close surveillance must be given to the piping, pumping and manifold areas, closely controlling the possibilities of leaks, and immediately remedying any leaks that may occur. Fires due to vapor leaks, or minor product spills, personnel trained in the proper use of firefighting equipment should extinguish them immediately.

3.1.2.5 Fire prevention is accomplished by ensuring proper construction, elimination of foreseeable procedures, good housekeeping, and proper maintenance and inspection of firefighting equipment

3.1.2.6 To implement the above, the TM will make periodic inspections of these premises. The inspection should include, but not limited to the following

3.1.2.6.1 Monthly inspection of all extinguishers, making certain they are fully charged, properly placed and ready to use

3.1.2.6.2 Monthly inspection of electrical equipment, grounds, fire prevention devises and corrects any adverse conditions and adequacy of secondary containment

3.1.2.6.3 Weekly inspect system and tankage areas to assure that adequate steps have been taken to eliminate potential hazards and sources of ignition such as dry grass and weeds

3.1.2.6.4 Daily inspection of pump areas shall be made to be certain there are no product leaks, spills, or evidence or poor housekeeping and that there is adequate protection against potential sources of ignition

3.1.2.6.4.1 Post "No Smoking" signs at proper locations and enforce rules

3.1.2.7 The TM shall handle spilled flammable liquids. A cleanup procedure shall be established, and a vapor hazard limit shall be set up

3.1.2.8 Annual fire drill shall be conducted to ensure that proper handling of fire equipment

3.1.2.9 In case of a fire, immediate actions will be taken by informing the Fire Department and TM. Direct responsibility for first action rests with the operator on duty to take the following steps

3.1.2.9.1 Sound Alarm

3.1.2.9.2 Shutdown Operations

3.1.2.9.3 Close all valves upstream and downstream of area of fire event.

3.1.2.9.4 Warn all immediate neighbors, attempt to evacuate the affected area

3.1.2.9.5 Control small fire by using fire extinguishers at hand. Use dirt when appropriate

3.1.2.9.6 Call 911, notify fire department and standby to brief and direct first responders as appropriate

3.1.2.9.7 Start Oil Spill containment procedures

3.1.2.9.8 Obtain additional help (man and equipment) as needed to control fire

3.1.2.10 All cleanup operations and disposal of all damaged material shall begin as soon as possible once the fire is brought under control and extinguished

3.1.3 ACCIDENTAL SPILLS AND/OR LEAKS

3.1.3.1 Any release of hazardous vapors or liquids in sufficient quantities to pose a threat to personnel, public, property or environment will be considered an emergency situation

3.1.3.2 Acts of sabotage or threats of sabotage (such as bomb threats) will be considered an emergency situation

3.1.4 NATURAL DISASTERS

3.1.4.1 Any natural disaster such as earthquake, forest fire, or flash flooding will be an emergency situation.

3.1.4.2 Monitor news media and any information releases from local officials

3.1.4.3 Inspect facilities and make provisions for any additional steps that may be required to protect life and property

3.1.4.4 Establish an action plan considering orderly procedures for possible evacuation of facilities

3.1.4.5 After all clear following any natural disaster event, perform damage assessment confirming system is safe for operations

8.

3.4.3 IDPC has written agreement with responsible contractor to ensure IDPC has personnel, equipment, instruments, tools, and material available as needed at the scene of an emergency compliant with § 194.5. Contractor under agreement has committed to having the availability of qualified personnel and equipment available to respond within 12-hours for worst case discharge as identified by IDPC facility response plan. Boise Fire Department coordinated with and is expected to provide appropriate fire response as necessary. IDPC has operation and maintenance spill kit and fire extinguishers intended for any minor operation and maintenance release or small fire that may occur. IDPC also has access to T.J. Construction Company, Dale Service, Inc. and Master Environmental contractors with qualified personnel and equipment that may be contracted if additional personnel and equipment is required for response of an Emergency. Idaho Air National Guard may also be able to provide personnel and equipment support.

3.1.1.1 Record the name and telephone number of the person making the report.

3.1.1.2 Determine location and condition of the emergency

3.1.1.3 Record time and date emergency was reported

3.1.1.4 Use Emergency Checklist E-01, Emergency Shutdown Procedure located in Appendix B of this manual to shut down the pipeline, minimize the pressure on the pipeline system, and minimize the amount of product that could be released

3.1.1.5 Notify fire and police departments immediately, Dial 911 as appropriate

3.1.1.6 Notify the Facility Supervisor

3.1.1.7 If emergency is a release of product, call for assistance to get appropriate work/repair and leak detection equipment dispatched to site. Oil Spill Response Contractors (OSRC) are listed in the Facility Response Plan Appendix C located in the IDPC office library

9.

3.3.1.4 Use Emergency Checklist E-01, Emergency Shutdown Procedure located in Appendix B of this manual to shut down the pipeline, minimize the pressure on the pipeline system, and minimize the amount of product that could be released

10.

3.3.1.7 If emergency is a release of product, call for assistance to get appropriate work/repair and leak detection equipment dispatched to site. Oil Spill Response Contractors (OSRC) are listed in the Facility Response Plan Appendix C located in the IDPC office library

3.3.1.7.1 Minimize sources of ignition such as motors, electric pumps, open flames etc....

3.3.2.4 Responding IDPC personnel should assist emergency responders (Fire and Police) in life saving actions, minimize public exposure, evacuate individual that is not associated with response activities, set up roadblocks and establish traffic control as appropriate.

3.3.2 Initial response steps to be taken by on-scene personnel. Evaluate the scene and make a preliminary assessment of the situation

3.3.2.5 TM or designated representative will notify Oil Spill Response Contractor and brief on known status of condition as soon as possible after confirming type and estimated size of emergency. OSRC will mobilize necessary safety, repair, and emergency response equipment to the scene of the emergency as soon as possible. Contact numbers listed in IDPC Facility Response Plan; Appendix C located in IDPC office library.

11.

3.3.1.7 If emergency is a release of product, call for assistance to get appropriate work/repair and leak detection equipment dispatched to site. Oil Spill Response Contractors (OSRC) are listed in the Facility Response Plan Appendix C located in the IDPC office library

3.3.1.7.1 Minimize sources of ignition such as motors, electric pumps, open flames etc....

3.3.2.4 Responding IDPC personnel should assist emergency responders (Fire and Police) in life saving actions, minimize public exposure, evacuate individual that is not associated with response activities, set up roadblocks and establish traffic control as appropriate.

3.3.2 Initial response steps to be taken by on-scene personnel. Evaluate the scene and make a preliminary assessment of the situation

3.3.2.6 At present time, no rail is within area of DICP facilities. If in the future, railroad is determined to be in an affected accident area, TM in coordination with on-scene first responders should take appropriate actions to notify railroad on situation to halt rail traffic through area until such time area is determined safe.

3.3.2.7 TM or designated representative will notify Oil Spill Response Contractor and brief on known status of condition as soon as possible after confirming type and estimated size of emergency. OSRC will mobilize necessary safety, repair, and emergency response equipment to the scene of the emergency as soon as possible. Contact numbers listed in IDPC Facility Response Plan; Appendix C located in IDPC office library.

12.

1.11.3 IDPC TM advantages face-to-face opportunities with attendance of the Local Emergency Planning Commission (LEPC), Utility Coordinating Committee (UCC), and face-to-face meetings with local fire, police and other emergency responders to discuss emergency response capabilities with a hazardous liquid pipeline emergency. Records of these meetings will be kept in the Public Awareness File in the office file cabinet

2.1.5.8 IDPC personnel periodically meets with fire, police, and other public officials to ensure all remain current on responsibility and resources of each organization that could respond to a hazardous liquid pipeline emergency. Records of these meetings will be kept in the IDPC office.

3.3.1.4 Use Emergency Checklist E-01, Emergency Shutdown Procedure located in Appendix B of this manual to shut down the pipeline, minimize the pressure on the pipeline system, and minimize the amount of product that could be released

3.3.1.5 Notify fire and police departments immediately, dial 911

13.

3.4.2 As soon as practical the IDPC TM or designated representative must perform a post-accident review of employee activities to determine whether the procedures were effective and take corrective action where deficiencies are found. All information will be collected after the

emergency, and review has been completed. The IDPC TM or designated representative will consolidate this information and complete an after-action report, along with incorporating changes to procedures to improve the response, available equipment, and overall actions, even if no deficiencies are noted, but recommended changes would improve the overall actions.

14.

1.4.3 Safety Related Condition Criteria

1.4.3.2 IDPC will utilize the System Inspection Guide procedures to identify any safety related conditions and report the existence of any of the following safety related conditions involving pipelines in service:

1.4.3.3 General Corrosion that has reduced the wall thickness to less than that required for the maximum operating pressure and localized corrosion pitting to a degree where leakage might result

1.4.3.4 Any unintended movement or abnormal loading of the pipeline that impairs serviceability/

1.4.3.5 Any material defect or physical damage that impairs the serviceability of the pipeline

1.4.3.6 A malfunction or operator error that would causes the pressure of a pipeline to rise above 110 percent of the maximum operating pressure

1.4.3.7 Any leak in a pipeline that constitutes an emergency

1.4.3.8 Any safety-related condition that could result in an imminent hazard and causes for purposes other than abandonment, a 20 percent or more reduction in the operating pressure or shutdown of operation of a pipeline

3.6.1 IDPC's emergency response training program instructs emergency response personnel to:

3.6.2 Carry out emergency response procedures IAW IDPC's Response Plan

3.6.2.1 Use SDS's to explain the characteristics of products handled

3.6.2.2 Instructs personnel to recognize conditions that likely cause emergencies, predict consequences of malfunctions or failures, and take corrective action

3.6.2.3 Take necessary steps to control any accidental release of Jet-A product to minimize the potential for fire, explosion, toxicity, or environmental damage. IAW Checklist E-01.

3.6.2.4 Learn potential causes, types, sizes and consequences of fire, appropriate use of firefighting equipment, and other personal safety equipment. Personnel will receive annual training on fire extinguisher operations.

3.6.2.5 Instructions to enable personnel to recognize and report potential safety related conditions

3.6.2.5.1 Identify General corrosion that has reduced wall thickness less than that required form mop, and localized corrosion pitting where leakage may result

3.6.2.5.2 Natural disaster causing pipe movement or displacing debris or equipment on top of pipe affecting serviceability

3.6.2.5.3 Damage or defect that results in change of pipeline serviceability or exceeding MOP

3.6.2.5.4 Leak constituting an emergency, and

3.6.2.5.5 Condition that could lead to imminent hazard

3.6.2.5.6 Utilizing on-line EWN training to recognize and react to Abnormal Operating Conditions

15.

3.5.1 Continuing training program provides all operational and maintenance personnel instructions regarding the procedures covering their assigned duties. Program includes:

- 3.5.1.1 Operating and maintenance procedures for assigned duties
- 3.5.1.2 Conditions that constitute a safety related condition
- 3.5.1.3 Characteristic and hazards of hazardous liquids
- 3.5.1.4 conditions that are likely to cause emergencies, predicting consequences of facility malfunction or failures and hazardous liquid spills, and appropriate corrective action
- 3.5.1.5 Steps necessary to control accidental release to minimize potential for fire, explosion, toxicity, or environmental damage
- 3.5.1.6 Proper use of firefighting procedures and equipment; and appropriate precautions for safe repair of facilities, such as isolation and purging.
- 3.5.1.7 Work performance of operator personnel reviewed periodically to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.
- 3.5.1.8 Training program may consist of one-on-one training, round table discussions, and shall also include conducting quarterly safety briefings covering these and non-work-related topics.

16.

1.2.4 TM and/or designated representative is responsible for all record keeping responsibility for records, manuals, and plans required by Regulations and this Manuals.

- 1.2.4.1 Manuals, plans, and operation and maintenance records required by this plan will be maintained as prescribed by this manual.
- 1.2.4.2 Records of plans and manuals required to be maintained will be forwarded to National Pipeline Manager for off-site record keeping. Expect that most if not all off-site records will be shared and available for review through drop box sharing.

3.5.2 At intervals not exceeding 15 months but at least once each calendar year IDPC TM will utilize actual and drill response reports to:

- 3.5.2.1 Review with personnel their performance in meeting emergency response training program
- 3.5.2.2 Make appropriate changes to emergency response training program
- 3.5.2.3 Require and verify that supervisors maintain through knowledge of emergency response procedures
- 3.5.2.4 IDPC TM should consider any recommendations for change to emergency response training. If determined changes are warranted, employees and contractors will be made aware of the change within 30-days of implementing

17.

3.4.1 IDPC TM is responsible to maintain a thorough knowledge of all emergency response procedures established under Title 49 CFR Part 195.402(e) that are in use on the IDPC pipeline system and for which they are responsible for insuring compliance. This will include participation in company emergency response exercises and maintaining "qualified" status on emergency response related CBT evaluations, to include Emergency Plan and Recognizing Emergency Conditions under IDPC OQ Plan. The CBT courses are scheduled reevaluations on yearly basis.

18.

6.8 Ignition Protection

6.8.1 To protect against ignitions arising out of static electricity, lightning, and stray currents IDPC personnel will follow the below API recommended Practice 2003 405(a)

6.1.1.1 During initial fill or when fuel level is below receipt line, receipt velocity will be limited to 3 ft per second until the level is 2 pipe diameters above the receipt line

6.1.1.2 Ensure metal gauging tape remains in contact with gauging hatch during entire gauging operation

6.1.1.3 Fuel will be allowed to settle prior to gauging tanks. A minimum of 30 minutes for all transfers of fuel out of a tank and 2 hours for receiving fuel into a tank.

6.1.1.4 Ensure metal gauging tape remains in contact with gauging hatch during entire gauging operation

6.8.2 To prevent against ignition hazards from lightning, personnel will ensure all hatches are closed and roofs are in good condition

19.

6.9 Potential Hazards Associated with Entry upon floating roofs. IDPC will not descend onto floating pan, instead IDPC TM or designated representative will verity 3rd party contractors confined entry plan is compliant with API Pub 2026 access/egress requirements. This section intended to summarize API RP requirements and may be used by IDPC TM or designated representative reviewing contractors confined entry plan and discussions appropriate topics during such review.

6.9.1 Entry into tanks constitutes permit required confined space entry. IDPC personnel will not perform any task associated with entry into tank/decent onto floating pans

6.9.2 Prior to entry into any tank/decent onto floating pans IDPC TM will assure that contractor supervisor has conducted: atmospheric testing requirements, briefed all personnel on potential hazards and all required safety equipment is provided and used by all personnel entering tank/descending onto floating pans

6.9.3 Atmospheric Testing

6.9.3.1 Potential atmospheric hazards must be determined prior descent upon floating roof

6.9.3.2 Tester must atmospheric hazards in sequence oxygen, flammability, and toxic air contaminates. Initial atmospheric testing will be obtained outside fixed roof opening. Additional atmospheric testing of space between fixed roof and floating pan will confirm presents of atmospheric hazards.

6.9.3.3 Continued atmospheric testing will be conducted at beginning of each shift, prior to reentry, after any prolonged periods of inactivity or work interruption, prior to starting hot work, and any time conditions are suspected to have changed.

6.9.3.3.1 Testing of the atmosphere in the work area space above of the floating roof shall be continuous or conducted as necessary to assure the continuation or maintenance of permitted safe working conditions.

6.9.3.3.2 Testing result will determine need for continuous or intermittent monitoring and use of approved respiratory protective equipment.

6.9.3.4 If subsequent testing indicates exposure limits or permit conditions are exceeded, determination must make if work can continue or not. If work is allowed to continue, decision must be made indicating under what conditions and requirements. Otherwise, continued entry shall be denied. Work stopped until, the entry supervisor or attendant shall cancel the permit, and work shall cease until such time as entry requirements is obtained.

6.9.4 Oxygen Content Hazard

6.9.4.1 Oxygen testing is considered in determine if enough oxygen is present to conduct flammable vapor testing, to determine if entry can be made without air supplied respiratory protection, and if toxic atmosphere levels are correct for upper flammable limits or lower flammable limits.

6.9.4.2 Safe entry into confirmed space requires oxygen content between 19.5% and 23.5%. oxygen content below 19.5% will require air supplied respiratory protection while no entry will be permitted when oxygen content above 23.5 is present

6.9.5 Flammable Vapor Hazards

6.9.5.1 Atmospheric vapor testing is performed to determine if flammable or combustible vapors are present. Inspect floating roof, pontoons, or seal area for presence of flammable or combustible liquids.

6.9.5.2 LFL above 10% LFL is unsafe for entry and will require corrective action (corrective action may be to vent space for mitigation of the unsafe condition) within space above floating roof reducing concentration of flammable vapor 10% or less for safe entry. Continue testing atmosphere until LFL is found to be safe for entry.

6.9.5.3 Consider possible secondary confined spaces that may exist such as inside pontoons, floats, seal areas or underneath floating as separate confined spaces requiring the same atmospheric testing for permitting entry.

6.9.6 Toxic vapor hazards

6.9.6.1 The atmosphere above the floating roof may contain hazardous hydrocarbon vapors, toxic vapors, or inert gases that exceed established exposure levels for safe entry without approved respiratory and personal protective equipment.

6.9.6.2 A determination shall be made of the toxic substances known or suspected to be present in a confined space atmosphere. Information for potential exposures and proper precautions may be obtained from

6.9.6.2.1 Employer, tank owner or operator, or from the manufacturer or supplier of the material.

6.9.6.2.2 OSHA standards

6.9.6.2.3 ACGIH publications, or

6.9.6.2.4 the safety data sheet (SDS) for the product involved.

6.9.6.3 Atmospheric testing for contaminants shall be conducted by a tester before entry onto a floating roof in order to determine if toxic exposures are present in excess of established permissible exposure limits.

6.9.6.3.1 Test results and potential for increased or continued exposure will determine the need for continuous or intermittent monitoring and the selection and use of respiratory protective equipment

6.9.6.4 Contractor will document the basis for determining that all potential hazards in a permit-required confined space have been eliminated. This certification will be available to all entrants containing the date, location, and signature of the person making the determination.

6.9.6.5 IDPC will provide contractor a copy of SDS for Jet fuel stored in the tank. The SDS addresses toxic substances and their potential effects, permissible exposure levels, and personal protection information.

6.9.7 Vapor Exposures

6.9.7.1 Even when the floating roof structure is in good mechanical condition, vapors may escape past the roof seals and gauge pipe well seals or other openings in the floating roof. The quantity of vapors escaping during normal tank operation is usually negligible provided that the seals are in good condition and neither the shell nor the roof is distorted

6.9.7.2 Escaping vapors may also accumulate in pontoons of the floating roof as a result of leakage. Pontoons should be considered as confined spaces and atmospheric testing and appropriate permit system and entry procedures should be followed whenever workers are required to enter a pontoon

6.9.7.3 Some of the factors which affect the quantity of vapors that may escape include, but are not limited to, the following:

6.9.7.3.1 Condition of seals—Vapors may escape past seals that are in poor condition.

6.9.7.3.2 Petroleum products entering the tank—Product may enter the tank may lead to the creation of an increased quantity of vapors.

6.9.7.3.3 Mixing or agitation—Tank contents, vapors under the roof may escape past the seal or vent. Vapor release can cause entrained liquid to blow past the seal and accumulate on top of the floating roof.

6.9.7.3.4 Tank operations—IDPC policy is not to allow any confined space entry onto floating roof while pumping out of the tank. However, it is understood that this policy this would not eliminate the possibility that previous wetted walls of the tank may lead to the creation of an increased quantity of vapors in the space above the floating roof.

6.9.7.3.5 Roof out of flotation—IDPC policy is not to permit confined space entry onto floating roof when liquid in tank is not sufficient to float roof unless tank has been emptied for out-of-service inspection and area below floating roof has been verified safe for confined space entry.

6.9.7.3.6 Returning a tank to service—IDPC policy is not to permit confined space entry onto floating roof when tank is being refilled.

6.9.7.3.7 Abnormal roof condition—Vapors will be present if the floating roof sinks beneath the surface of the product or if it is hung up inside the tank in a tilted position.

6.9.8 Fire Hazards

6.9.8.1 Some of the potential fire hazards associated with descent upon floating roofs include, but are not limited to, the following:

6.9.8.1.1 A flammable vapor air mixture may exist in the atmosphere above the floating roof (e.g., a roof seal can leak).

6.9.8.1.2 A flammable or combustible liquid may be present on the floating roof

6.9.8.1.3 A flammable or combustible liquid or vapor may be present in the pontoon or in the seal area

6.9.8.1.4 When the floating roof is out of flotation, and the liquid level is below the roof support, a flammable vapor air mixture may exist in the atmosphere below the roof

6.9.8.1.5 When filling a tank whose roof has been out o floating and the liquid level has been below the roof level, vapors may be forced through the roof seal and into the atmosphere above the floating roof.

6.9.8.1.6 Absorbent buoyant materials used in the construction of some floating roofs may retain flammable or combustible liquids

6.9.9 Physical Hazards

6.9.9.1 Entry onto floating roofs presents potential physical hazards including, but not limited to, restricted entry and exit, limited visibility in internal and covered open top floating-roof tanks, tripping and falling. IDPC TM shall coordinate and assure contractors that safe work practices address potential physical hazards associated with entry onto floating roofs in their facilities.

6.9.9.2 Falling and tripping hazards may include:

6.9.9.2.1 Falling from a ladder or stairway.

6.9.9.2.2 Falling from a tank roof or walkway onto the floating roof.

6.9.9.2.3 Slipping, tripping, or falling upon the floating roof.

6.9.9.2.4 IDPC policy is not to permit confined entry onto float roof while tank is in service. However, corrosion may occur to floating roofs; therefore, falling through a corroded covered open top floating roof remains a concern.

6.9.9.3 IDPC tanks are floating pan with covered roof tanks constructed of steel with pontoons for flotation and, when in good condition, will support the weight of workers and equipment. Floating roofs shall be visually inspected from above for structural stability prior to descent. Because some mechanical deficiencies and corrosion may not be noticeable from the top platform, if there is any doubt about the integrity of a floating roof, metal-thickness readings or other appropriate structural testing or measurements should be obtained using proper safety precautions.

6.9.9.4 If weak areas are found during inspection or are known to exist in the floating roof, access to these areas shall be prohibited until suitable reinforcement has been provided.

6.9.9.5 Adequate lighting, suitable for the area's hazard classification, shall be provided for work to be performed on the floating roof.

6.9.9.6 The outside roofs. ladders, stairways, and rails, and other roof supports and appurtenances shall be inspected to assure they can hold and support the

weight of any equipment or material which is to be placed on top of them, or attached to them, for lowering onto the floating roof, prior to such use.

20.

5.15 Damage Prevention Program

5.3.1 IDPC's written Damage Prevention Program for purpose of preventing damage to the pipeline from excavation activities. IDPC participates in the Idaho One Call Program "Dig-Line" (Idaho Statue Title 55, Chapter 22, Underground Facilities Damage Prevention). As such, IDPC receives one-call dig ticket from Dig-Line identifying intent of individual, excavator company, homeowners, farmers, municipality, and other utilities intending to excavate, blast, bore, tunnel, backfill, remove aboveground structures, and conducting earthmoving operations. As a rule, IDPC does not authorize blasting in the impact area of such blasting.

5.3.2 Program provides for:

5.3.2.1 Identity of persons who normally engage in excavation activities in IDPC's pipeline area.

5.3.2.2 Provides for notification and education of the public and excavators digging in the vicinity of the pipeline

5.3.2.2.1 IDPC's coordinates, attends site meetings, and directly observes excavation in close proximity to verity pipeline does not sustain damage during excavation and backfilling activities

5.3.2.2.2 PAP brochure materials, coordination conversation with excavators, and face to face meetings provide information explain how to identify the location of underground pipelines, emergency reporting, and notification of Dig Line prior to any excavation.

5.3.2.3 The Idaho Dig Line Program provides a means of receiving and recording notification of planned excavation activities. When planned excavation is within established area of IDPC facilities, Dig-Line forwarders dig ticket to IDPC utility action. Dig tickets are maintained on file in the IDPC office. A crossing report will be filed with each applicable notification that affects IDPC facilities.

5.3.2.4 IDPC makes positive response to persons who give notice of their intent to excavate. When excavation is in close proximity to the pipeline, type of temporary marking is utilized to mark pipeline location.

5.3.2.5 Program includes provisions for locating and marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins. Any known exposed pipeline will be inspected, and results documented on crossing report.

5.3.2.6 Provisions for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:

5.3.2.6.1 The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline and

5.3.2.6.2 IDPC will not allow blasting in the vicinity of their pipeline, any inspection must include leakage surveys

21.

6.5 Training, written or computer-based instruction and exams:

Classroom instruction and/or computer-based training with associated exams will be used to ascertain the knowledge elements required. New hires will be pre-tested and/or trained as appropriate prior to performing a covered task. New hires will be observed and directed by qualified personnel until such time as they are qualified to perform the task. The exam criteria evaluate the individual's knowledge required to perform a covered task. The passing score for course exams is set at 80 percent of the questions answered correctly. Individual examination scores are stored in the records management system. More record keeping information can be found on page 19 (0. 6.18 Record Keeping)
6.6 Performance Field Evaluations and / or On-the-job Observations criteria:

The performance field evaluation (observation) process ascertains the individual's skill and ability to perform a covered task. Documentation of the employee's response and observation of the employee performance of a covered task are recorded on the performance field evaluation checklist. Performance field evaluations are scored as pass/fail. Then the evaluation result is entered and maintained in the records management system.

The performance field evaluations areas needing improvement will be reviewed with the individual to ensure individuals have the proper knowledge, skill and ability, and are instructed in the proper procedures to perform the covered tasks

22.

IDPC Response

In regard to Item # 22, IDPC O&M Change #5, dated August 29, 2019 section 7.4.3 clarified process for an individual not qualified on a covered task changed to include provisions to allow individual not qualified to perform a covered task to perform the covered task when directly observed by an individual qualified on that particular covered task. IDPC OQ Plan Change # 1 dated January 8, 2012 section 6.8 clearly established the process for a qualified person directing and observing no qualified individual performing a covered task.

6.8 Allow Individuals that are Not Qualified Pursuant to 195.505 (Qualification Program) to perform a covered task if directed and observed by an Individual that is Qualified:

A non-qualified person or new hire is allowed to perform a covered task when directed and observed by a person who is qualified in the covered task being performed. A Qualified person will direct and observe a non-qualified or newly hired employee until the individual can successfully complete the evaluation/qualification process. A Qualified person must be close enough to direct and observe the work and react to abnormal conditions, and to take immediate corrective action. The span of control shall be task specific and a qualified employee can only direct and observe the performance of one covered task at a time. Ideally the non-qualified to qualified individuals performing a task will be a one-to-one ratio. However, multiple non-qualified individual ratios may be authorized on case by case bases for training and for use as helpers to qualified individuals as long as proper span of control can be maintained.

Guidelines for new hires for OQ Qualified individuals: When an individual with OQ qualifications is newly hired, that individual's OQ qualifications do not automatically transfer. The new individual's supervisor, in conjunction with the OQ Administrator, must review any available documentation for that individual's OQ qualifications and will decide if any of the OQ qualifications before those evaluations will transfer. The new individual must pass an initial OQ qualification for any covered task not approved.

23.

7.0 Management of Change Process

A Management of Change (MOC) Process is defined and is required to ensure that IDPC has established procedures to communicate changes that may affect the performance of covered tasks performed by IDPC, any contracted employee, and/or those covered under Mutual Assistance. The MOC process seeks to ensure that changes that impact IDPC are factored into the evaluation and re-qualification of individuals that perform covered tasks affected by the approved change. The Facility Manager or designated representative will be responsible for the operation and the successful utilization of the MOC process.

IDPC's OQ program will identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the company, contracted individuals or those covered under mutual assistance agreements.

The MOC process utilizes the Change Matrix Form, Appendix 3: Changes Part B – Change Matrix to record the changes to tools, procedures, standards and other elements that are used in performing covered tasks. The contractors who perform the covered tasks are to be notified of the approved changes involving a covered task(s) requirement, so they remain qualified. Changes will also be communicated from any person performing a covered task to the administrator. Information should flow both ways to improve the operation of the pipeline facility. The change matrix form provides a standard format in which to record the changes and provides a record that can be tracked to ensure the changes were identified and communicated properly.

The MOC process will be utilized to monitor training programs, review OQ plans and the evaluation process. When a significant change is approved and added to the Operator's Written OQ plan, a copy of the new plan and its changes will be forwarded to the Office of Pipeline Safety (OPS) and the State regulatory agency responsible for OQ. The MOC process will review all modifications to company policies or procedures. This process will also review the utilization of new equipment and/or technology that affects covered tasks being performed or the development of new covered task assignments.

From the time a change is approved until the impact of the change is communicated to persons expected to perform covered tasks will not exceed 60 days. Each change will be reviewed against all work performed on covered tasks.

The changes will be communicated to all individuals affected including contractors. The method of communication will be expedient and accomplished via any of the following: policies and procedures, safety meetings, pre-job briefings, management directives, written or electronic notification. IDPC will assure the changes will require sign off of affected individuals or a return receipt.

Records of changes will be maintained showing that all employees including contractors assigned to affected tasks are informed of the changes

24.

1.22 Maps and records will be kept current and contain the information below. Any changes to the facilities are to be recorded on as-built drawings.

1.22.1 Current maps or records must be maintained to show the location of cathodically protected pipelines, cathodic protection facilities, including number galvanic anodes installed or spacing, installed after January 28, 2002 and neighboring structures bonded to cathodic protection systems.