

Appendix L

Sandy Conlan, Olympic – Interview Transcript

Pipeline Rupture and Fire
Bellingham, Washington
June 10, 1999
DCA-99-MP-008

1 (Laughter)

2 CHAIRMAN BESHORE: Thank you, Mr. White.
3 We'll go off the record.

4 MR. WHITE: Thank you.

5 (Whereupon, the witness was excused.)

6 INTERVIEW OF SANDRA MARIE CONLAN

7 CHAIRMAN BESHORE: Ms. Conlan, my name's
8 Allen Beshore. I'm the lead investigator from -- for
9 NTSB investigating the pipeline rupture and fire that
10 happened in Bellingham in June of '99. I want to thank
11 you for coming in this morning and answering some
12 questions for us.

13 The format, I'm going to start off and I'm
14 going to answer -- I'm going to ask you some questions.
15 And then when I run out of questions or when I need to
16 just stop and collect my thoughts, we're going to go
17 around the table and each of these other folks may ask
18 some follow-up questions of you.

19 So, since they may be asking you questions I
20 want for them to each introduce themselves so you know
21 who they are and who they represent.

22 MS. CONLAN: Okay.

23 MR. ZIMMERMAN: Hello. I'm Cliff Zimmerman.
24 I'm an accident investigator with NTSB.

25 MR. SCHAU: I'm Jerry Schau. I'm with BP.

1 MR. PARRISH: John Parrish. I'm with
2 Daniel -- formerly Fisher-Rosemont Petroleum.

3 MS. IMHOF: I'm Patti Imhof with IMCO General
4 Construction.

5 MR. KATCHMAR: Peter Katchmar with the Office
6 of Pipeline Safety.

7 MR. SMYTH: Geoffrey Smyth, City of
8 Bellingham Public Works.

9 MS. PILKEY-JARVIS: Hi. Linda Pilkey-Jarvis
10 with Department of Ecology out of the Olympia office.

11 CHAIRMAN BESHORE: And Ms. Conlan, you have a
12 representative here with you. If they could identify
13 themselves today?

14 MR. HANSEN: Yeah, Richard Hansen, H-A-N-S-E-
15 N. And I'm a local attorney representing Ms. Conlan.

16 CHAIRMAN BESHORE: And how can you be
17 reached?

18 MR. HANSEN: 447-9681 is my phone number,
19 area code 206. I'd be glad to give you cards, if
20 that's easier.

21 CHAIRMAN BESHORE: Okay. That would just --

22 MR. HANSEN: I'll give it to the court
23 reporter.

24 CHAIRMAN BESHORE: -- we'll just enter that
25 into the record. That'd be great.

1 MR. HANSEN: Anybody else who wants one?

2 CHAIRMAN BESHORE: Okay. Ms. Conlan, if you
3 could just state your full name, please, for us?

4 MS. CONLAN: Sandra Marie Conlan.

5 CHAIRMAN BESHORE: And let's -- can you
6 briefly describe your educational background for us?

7 MS. CONLAN: High school, and then I had some
8 classes and seminars over the years.

9 CHAIRMAN BESHORE: So you -- you have a high
10 school -- a high school diploma but --

11 MS. CONLAN: No college.

12 CHAIRMAN BESHORE: -- no college education
13 formally?

14 MS. CONLAN: No.

15 CHAIRMAN BESHORE: Can you just briefly go
16 through your -- your -- with us your history, your
17 tenure at Olympic Pipeline?

18 MS. CONLAN: It started in March of '95 as a
19 temporary typing up the DOT Regulations Manual. And I
20 completed that task, and they kept me on doing other
21 tasks, assisting in the right-of-way department,
22 helping in the health and safety, various MSDSs and
23 things like that. I left in August and then was --
24 came back on contract in January of '96 working on the
25 Cross-Cascade project.

1 And then I was hired full-time in July of
2 '97, originally into the control center. And then I
3 came out of there and went back into the HS & E
4 department.

5 CHAIRMAN BESHORE: And when did you come back
6 out of the control center?

7 MS. CONLAN: September of '97.

8 CHAIRMAN BESHORE: Okay. So you were just in
9 there --

10 MS. CONLAN: For a few months.

11 CHAIRMAN BESHORE: And then what was your
12 role then in September '97?

13 MS. CONLAN: I was responsible for putting
14 our manuals onto the intranet and maintaining the
15 intranet as well as performing like the hazardous waste
16 reports for ecology and waste disposal. I was
17 responsible -- we had a -- a situation in the Maplewood
18 area where we have a remediation system. I was -- in
19 charge of that clean-up and the response and so forth,
20 so it was more environmental.

21 CHAIRMAN BESHORE: And I've seen in -- what's
22 your title?

23 MS. CONLAN: Now it's training and compliance
24 coordinator.

25 CHAIRMAN BESHORE: What was your title in

1 June of '99?

2 MS. CONLAN: June of '99 I was a compliance
3 specialist.

4 CHAIRMAN BESHORE: Is that -- was that your
5 title that you got in September '97?

6 MS. CONLAN: That was the title I got in June
7 of '98. I was still a controller trainee until that
8 point.

9 CHAIRMAN BESHORE: Okay. You were still a
10 controller trainee but -- but you had been transferred
11 out of that --

12 MS. CONLAN: Right. The --

13 CHAIRMAN BESHORE: -- but you just -- your
14 title caught up with you?

15 MS. CONLAN: Exactly.

16 CHAIRMAN BESHORE: Okay. Who do you -- who -
17 - who did you report to? Most of my questions are
18 going to be talking about as of June 10th of 1999. I
19 know things have changed for you since then and we'll
20 talk about that a little bit. But who did you report
21 to at that -- at the time of the accident?

22 MS. CONLAN: Dan Yount.

23 CHAIRMAN BESHORE: And how long had Dan been
24 your supervisor?

25 MS. CONLAN: He came on board in July of '98.

1 So just a year.

2 CHAIRMAN BESHORE: Okay. Who was your
3 supervisor prior to that?

4 MS. CONLAN: Ron Brentson.

5 CHAIRMAN BESHORE: Now, was that as a -- as a
6 controller trainee?

7 MS. CONLAN: Correct.

8 CHAIRMAN BESHORE: Do you supervise any -- or
9 did you supervise anybody in -- in June of '99?

10 MS. CONLAN: No.

11 CHAIRMAN BESHORE: When you -- when you came
12 to Olympic do -- do you recall or -- in the '97-'98
13 time frame, do you recall any -- any discussions or any
14 -- anything concerning any internal inspection runs
15 that had been performed on the pipeline systems?

16 MS. CONLAN: I was aware of the runs.

17 CHAIRMAN BESHORE: You -- you were aware that
18 they had been run? Were you aware of any of the -- any
19 of the results of those inspections?

20 MS. CONLAN: No, but it was -- no. It was
21 common knowledge that, you know, we had run the smart
22 pigs and that there were excavations associated with
23 those, but I was never involved in any of the -- the
24 dig-ups or anything.

25 CHAIRMAN BESHORE: Did you -- I mean did you

1 see the records involving those things? Is that part
2 of your role?

3 MS. CONLAN: No.

4 CHAIRMAN BESHORE: Did you -- were you aware
5 of the interactions with the Department of Ecology
6 during that time frame?

7 MS. CONLAN: Well, I know that we dealt a lot
8 with the Department of Ecology, especially in '96
9 because of -- we had two releases, and so there were --
10 I was involved in corresponding with them, preparing
11 the -- the documentation for them, not necessarily
12 gathering it because I was given information from
13 others to prepare the -- the final submittal to them.

14 CHAIRMAN BESHORE: So you're familiar with
15 the documentation that submitted a listing of -- for
16 example, of proposed or potential excavations to the
17 Department of Ecology?

18 MS. CONLAN: Right.

19 CHAIRMAN BESHORE: But you weren't
20 necessarily involved in developing that listing?

21 MS. CONLAN: No, not at all.

22 CHAIRMAN BESHORE: Were you aware of any
23 scheduling that was associated with those excavations?

24 MS. CONLAN: No.

25 CHAIRMAN BESHORE: In that time frame do

1 you -- do you recall the last correspondence that was
2 developed for the Department of Ecology?

3 MS. CONLAN: I believe it was right around
4 May or June of '97. But I only know that because
5 Richard Claussen had been asking me for that
6 documentation.

7 CHAIRMAN BESHORE: After the accident?

8 MS. CONLAN: Yeah, this was just probably
9 this year, maybe the end of last year. That's the only
10 reason I know that.

11 CHAIRMAN BESHORE: Okay. So you don't recall
12 based on your -- your job in '97 this correspondence
13 but you after the accident went back and dug -- did
14 some digging?

15 MS. CONLAN: Correct.

16 CHAIRMAN BESHORE: All right. Do you recall
17 the nature of that -- that last correspondence in '96?

18 MS. CONLAN: I believe it had to do with -- I
19 thought it was the criteria used to determine whether
20 or not we need to excavate. But again, I know that
21 because it was explained to me after the fact. I mean
22 just recently.

23 CHAIRMAN BESHORE: Okay. And I -- I don't
24 mean to be cryptic but unfortunately I didn't bring
25 this correspondence or I'd just -- I'd just show it to

1 you and we'd talk about it a little bit further.

2 Were you aware that the -- there was -- did
3 you know that there was some intended follow-up or was
4 there some intended follow-up to be done later on after
5 this final correspondence? Do you know?

6 MS. CONLAN: I don't know that.

7 CHAIRMAN BESHORE: And going back to your
8 role in '97, do you recall what happened with the issue
9 of -- of -- of the administrative work on DOE and --
10 and this correspondence in terms of the final
11 resolution of this issue? Do you remember how it was
12 resolved or how it was finalized?

13 MS. CONLAN: No, I don't.

14 CHAIRMAN BESHORE: But you're not aware of
15 your -- in your recent looking for these documents,
16 you're not aware of anything that was later than that
17 that was a follow-up to those May-June --

18 MS. CONLAN: I don't believe -- no.

19 CHAIRMAN BESHORE: Are you -- are you --
20 you're aware of a listing of excavation locations,
21 correct? That was attached to that correspondence?

22 MS. CONLAN: Vaguely.

23 CHAIRMAN BESHORE: Did you have any
24 involvement -- this is after the accident. Did --
25 the -- the document we were provided after the accident

1 was an updated version of the one that was provided to
2 the Department of Ecology.

3 MS. CONLAN: Right.

4 CHAIRMAN BESHORE: Did you prepare that
5 update?

6 MS. CONLAN: Yes.

7 CHAIRMAN BESHORE: When -- did you prepare it
8 -- prepare that after the accident?

9 MS. CONLAN: Yeah, that was prepared starting
10 in September '99. I believe that was September 10th or
11 somewhere right around there. You -- NTSB had
12 submitted their request for specific information, and I
13 think that that was one of the items on that list of --
14 in that letter. And I went through the books and,
15 actually, Richard Claussen had gone through and
16 identified the specifics and I went through and
17 gathered all the pertinent data to put together to
18 provide to you.

19 CHAIRMAN BESHORE: Okay. And let's just --
20 Linda was kind enough to provide me with a copy of this
21 correspondence, so we'll go ahead and put that into the
22 -- an exhibit for you marked Conlan Exhibit 1.

23

24

25

1 (The document referred to was
2 marked for identification as
3 Conlan Exhibit 1 and was
4 received in evidence.)

5 CHAIRMAN BESHORE: And if you can just take a
6 look at that. That's front and side -- front and back
7 side of the copies. And the -- the page I'm referring
8 to now is that summary of excavations.

9 MS. CONLAN: We had changed the format when
10 it was provided to either the NTSB or DOT. But I -- I
11 mean I've seen this before but I couldn't tell you for
12 sure when. And obviously, it's from the flutter, but
13 --

14 CHAIRMAN BESHORE: Okay. But you were -- you
15 were -- you were tasked after the accident based on
16 either our request or OPS's request, I'm not sure
17 which, to update that summary of -- of -- of
18 investigations based on information that had been
19 reported to you?

20 MS. CONLAN: Correct.

21 CHAIRMAN BESHORE: And do you remember what
22 the update was for the specific location there on the
23 Ferndale and the Allen line?

24 MS. CONLAN: Oh, we added a number of --
25 Richard identified the line items that we needed to

1 add, so I updated the spreadsheet based on data that I
2 was provided and then I just gathered the diagram of
3 change and it's those five reports, those types of
4 things.

5 CHAIRMAN BESHORE: Okay. Do you recall if
6 there was anything done on the -- the one on the
7 Ferndale or the Allen lines?

8 MS. CONLAN: I -- without looking at the --
9 what we provided you I -- I don't remember.

10 CHAIRMAN BESHORE: Okay. All right. All
11 right. So all the -- all the documentation associated
12 with any pipeline -- let me just -- well, let me just
13 back up a little bit here and ask you to kind of define
14 what your role was as a -- as of June 10th, '99, in
15 terms of, you know, what your job function was, what
16 you -- what you were doing, what -- what you were
17 responsible for?

18 MS. CONLAN: I was the documentation unit
19 leader within the planning section for the response,
20 and that kind of converted into a -- an Aqualon
21 position of planning coordinator, just working with the
22 various sections to get the IP developed and signed and
23 sent out. After the response was over I continued on
24 in Bellingham and was responsible for obtaining
25 information for DOT and NTSB and others requesting

1 information, attorneys and so forth. And you know,
2 whatever else came up kind of things.

3 CHAIRMAN BESHORE: Okay. I'm sorry. I was
4 actually asking about just prior to the --

5 MS. CONLAN: Oh, prior to the accident. I
6 was responsible for DOT compliance, just environmental
7 in general, hazardous waste disposal, that type of
8 thing.

9 CHAIRMAN BESHORE: Would you receive -- for
10 example, in terms of the DOT compliance issue, would
11 you receive, you know, the documentation of pipeline
12 repairs or this kind of thing?

13 MS. CONLAN: No.

14 CHAIRMAN BESHORE: Was that something you
15 filed and maintained in files?

16 MS. CONLAN: Those -- I didn't -- those did
17 not come to me. The exposed pipe reports came to me.
18 They were already -- they went through the right-of-way
19 office before they came to me so I just filed them.
20 More of the compliance issues that I dealt with were
21 like the monthly tank inspections, the station checks,
22 valve inspections, things like that. And just
23 coordinated and reminded the field people that these
24 certain inspections were due within a certain time
25 period and to get them to me.

1 CHAIRMAN BESHORE: Okay. So you didn't
2 necessarily check the -- you weren't necessarily
3 responsible, I guess, for checking the documentation to
4 make sure that it was complete, in compliance with your
5 requirements?

6 MS. CONLAN: No.

7 CHAIRMAN BESHORE: And you didn't necessarily
8 file or maintain the files for all of the documentation
9 to ensure your compliance but with certain items such
10 as the ones you mentioned?

11 MS. CONLAN: Correct.

12 CHAIRMAN BESHORE: Okay. Let's -- let's --
13 let's -- let's talk about that a little bit, then. In
14 terms of the -- there -- when was your last DOT
15 inspection? Prior to the accident.

16 MS. CONLAN: April of '99.

17 CHAIRMAN BESHORE: April of?

18 MS. CONLAN: '99.

19 CHAIRMAN BESHORE: Okay. And in -- in terms
20 of -- who all was involved in Olympic's -- on Olympic's
21 behalf in that -- in that inspection?

22 MS. CONLAN: Dan Yount, mainly. I kind of
23 popped in and out and answered questions for -- we had
24 others do the same. Like for the corrosion, we had our
25 corrosion technician there and answered the questions

1 regarding that.

2 CHAIRMAN BESHORE: So Dan -- Dan was the lead
3 for Olympic on that, the lead contact, and he was your
4 supervisor?

5 MS. CONLAN: Yeah.

6 CHAIRMAN BESHORE: And in terms of
7 preparation, did you guys have meetings to prepare for
8 that audit, that kind of thing, in advance of that?

9 MS. CONLAN: No, I don't recall any meetings.

10 CHAIRMAN BESHORE: You don't -- did you guys
11 all review --

12 MS. CONLAN: I went through the documentation
13 to make sure that we had all the appropriate
14 inspections and -- and made sure that the files were in
15 order.

16 CHAIRMAN BESHORE: Was there anything -- in
17 that audit that you guys were concerned about that --

18 MS. CONLAN: No.

19 CHAIRMAN BESHORE: -- that OPS might find?

20 MS. CONLAN: No.

21 CHAIRMAN BESHORE: So you didn't have any
22 discussions on those lines? Nothing that you can think
23 of?

24 MS. CONLAN: Not that I can recall, no.

25 CHAIRMAN BESHORE: No -- no violations of the

1 rules that you're aware of that --

2 MS. CONLAN: No. I mean we had --

3 CHAIRMAN BESHORE: -- caused some concern?

4 MS. CONLAN: -- we had one tank inspection
5 that was missing, and you know, if you don't have it
6 you don't have it. So -- and I knew that there was --
7 there was a tank inspection missing, but other than
8 that I can't -- and that wasn't a huge concern of mine,
9 anyway.

10 CHAIRMAN BESHORE: Okay. There wasn't
11 anything monumental that you --

12 MS. CONLAN: No.

13 CHAIRMAN BESHORE: -- lost sleep over --

14 MS. CONLAN: No.

15 CHAIRMAN BESHORE: Okay.

16 (Pause)

17 CHAIRMAN BESHORE: Let's go back, I guess,
18 and talk a little bit more about -- about this type
19 of -- of thing. In terms of the DOT compliance, in
20 terms of abnormal operations, how familiar are you with
21 Part 195, I guess. Is that -- is that a fair question?

22 MS. CONLAN: Very familiar.

23 CHAIRMAN BESHORE: Are you very familiar with
24 Part 195? And so you're familiar with the requirements
25 in Part 195 about your -- your manual addressing

1 abnormal operations?

2 MS. CONLAN: Yes.

3 CHAIRMAN BESHORE: Does it?

4 MS. CONLAN: Yes, it does.

5 CHAIRMAN BESHORE: And are you familiar with
6 the -- the procedures in place there within the
7 organization for handling abnormal operations?

8 MS. CONLAN: Fairly. I mean I would need to
9 review the section to give you specifics, but I do
10 maintain that manual on our intranet.

11 CHAIRMAN BESHORE: Do you -- I mean is there
12 a process in place for people to record -- or was
13 there, excuse me, in June of '99 a process in place for
14 people to record abnormal events, report them to
15 somebody else?

16 MS. CONLAN: I don't remember what the manual
17 said back then. Now there is. And I believe that we
18 referred to the spiral notebook in the control center
19 in June of '99. But I -- I'm not positive.

20 CHAIRMAN BESHORE: -- I'm sorry.

21 MS. CONLAN: It's a -- it's a notebook that
22 we keep in the control center that if there is an
23 abnormal condition that they -- they note it in this
24 book. And depending on the situation, they're
25 required, I believe, depending on the situation,

1 they're required to notify their supervisor.

2 CHAIRMAN BESHORE: There again -- and that's
3 just a spiral-bound lined-paper thing that they record
4 notes in?

5 MS. CONLAN: Yeah.

6 CHAIRMAN BESHORE: What would that be called?

7 MS. CONLAN: It's referred to as the spiral
8 notebook.

9 CHAIRMAN BESHORE: The spiral --

10 MS. CONLAN: The spiral notebook.

11 CHAIRMAN BESHORE: -- spiral notebook.

12 MS. CONLAN: Technical term.

13 (Laughter)

14 CHAIRMAN BESHORE: Okay. Now, is that
15 something that in terms of -- of DOT compliance again,
16 is that something that you would be looking at?

17 MS. CONLAN: I do not review that, no.

18 CHAIRMAN BESHORE: Okay. Do you know if
19 anybody does?

20 MS. CONLAN: The supervisor's supposed to.

21 CHAIRMAN BESHORE: And the supervisor is?

22 MS. CONLAN: It's right now Rick Roston.

23 CHAIRMAN BESHORE: Who was it in June of '99?

24 MS. CONLAN: Ron Brentson.

25 CHAIRMAN BESHORE: Well, is this -- I mean is

1 this still the -- the current procedure to record
2 abnormal operations in the spiral notebook or is it --

3 MS. CONLAN: It's the procedure now, but
4 I'm -- I -- I believe it was the procedure then, but
5 I'm not positive.

6 (Pause)

7 MR. HANSEN: Did you say who does it now?

8 MS. CONLAN: Rick Roston is now the --

9 CHAIRMAN BESHORE: And Ron was in June of
10 '99?

11 MS. CONLAN: Yes.

12 (Pause)

13 CHAIRMAN BESHORE: Had you -- this is prior
14 to June -- June of -- of -- of '99, and we'll ask about
15 since also -- were you -- did you have any discussion -
16 - did you have any involvement in the design of Bayview
17 Station?

18 MS. CONLAN: No.

19 CHAIRMAN BESHORE: Had you had any
20 conversations after Bayview Station was commissioned on
21 any operational concerns that anybody expressed to you?

22 MS. CONLAN: No.

23 CHAIRMAN BESHORE: In your role did you have
24 a lot of contact with the field guys?

25 MS. CONLAN: Yeah, frequent.

1 CHAIRMAN BESHORE: Would you say daily?

2 MS. CONLAN: No.

3 CHAIRMAN BESHORE: Did they let you know
4 about their schedules, what they were -- did you have
5 any need to know that or did they inform you of the
6 projects that were going on, things like that?

7 MS. CONLAN: No.

8 CHAIRMAN BESHORE: Did you -- were you
9 involved in any -- any meetings to follow up on the
10 commissioning of Bayview in terms of troubleshooting?

11 MS. CONLAN: No, I had been involved in a
12 couple meetings before, but it was just a come and
13 listen in-type thing. But after it was commissioned, I
14 -- I was not involved in any meetings.

15 CHAIRMAN BESHORE: And those meetings, were
16 they -- what were they about? When were they and what
17 were they about?

18 MS. CONLAN: They were early '98 and they
19 were -- it was like the Cross-Cascade group and Jacobs
20 Engineering and -- and I believe it was more on a
21 Cross-Cascades side asking what they were doing for
22 Bayview and just so they could keep the facilities
23 consistent during the design of the -- the Cross-
24 Cascade project. So it was about Bayview but not for
25 Bayview, if that makes sense.

1 CHAIRMAN BESHORE: Okay. -- that
2 interruption.

3 (Pause)

4 CHAIRMAN BESHORE: In term -- in -- in -- in
5 terms of -- was -- were you involved in any -- any
6 discussions about functionality of any relief --
7 pressure relieving devices at Bayview?

8 MS. CONLAN: No.

9 CHAIRMAN BESHORE: Prior to June -- how about
10 since the accident?

11 MS. CONLAN: There has since been a lot
12 discuss about -- discussion about those valves.

13 CHAIRMAN BESHORE: About the relief valve in
14 particular?

15 MS. CONLAN: Well, the relief valves and
16 relief valve testing and flow testing and relief
17 valves, and not specifically just at Bayview but all of
18 our relief valves.

19 CHAIRMAN BESHORE: But you weren't aware of -
20 - in any conversations you weren't aware of -- nobody
21 mentioned prior to the accident any concerns to you
22 about anything at Bayview?

23 MS. CONLAN: No. I had heard, you know, in
24 the hallway that we had had an -- a problem but it was
25 April or May of '99 that something wasn't operating

1 correctly, but it didn't mean anything to me.

2 CHAIRMAN BESHORE: Where were you before
3 coming -- coming to Olympic? What occupation?

4 MS. CONLAN: I worked in banking for eight
5 years and then quit and stayed home with my kids and
6 then went back to work in -- as a temporary to find a
7 permanent position.

8 CHAIRMAN BESHORE: Okay. So you -- you
9 didn't get out in the field and you weren't -- were you
10 in the field at all in any --

11 MS. CONLAN: I --

12 CHAIRMAN BESHORE: -- your role in terms of
13 the -- with Olympic?

14 MS. CONLAN: Yeah, I was involved in the
15 Calamer re-route back in '96 and helped to purchase
16 property and change easements and different things for
17 that re-route.

18 CHAIRMAN BESHORE: And that was when you were
19 in --

20 (Pause)

21 CHAIRMAN BESHORE: All right. Let's talk
22 about the -- the O & M manuals. Now, you said that you
23 put them on the intranet. Are you -- do you have any
24 responsibility for updating them?

25 MS. CONLAN: Yes. Well, I update them.

1 Anybody really could because they just provide
2 documentation of what needs to be changed.

3 CHAIRMAN BESHORE: Okay. So somebody
4 provides you with the proposed change to the O & M
5 manual?

6 MS. CONLAN: Yes.

7 CHAIRMAN BESHORE: And then you actually
8 update the manual?

9 MS. CONLAN: Yes.

10 CHAIRMAN BESHORE: Who -- who does that?

11 MS. CONLAN: Depending on the situation, if a
12 technician out in the field changes the way something
13 functions, he will provide that documentation to me.
14 Now every January we all get together and make changes
15 or update the manual, review it, and we'll make changes
16 right there, so the changes can come from anybody at
17 that point. If somebody changes an alarm, a -- alarm,
18 then we'll go in and revise that.

19 CHAIRMAN BESHORE: Was this done in January
20 of '99?

21 MS. CONLAN: It was not.

22 CHAIRMAN BESHORE: When was the -- was there
23 any meeting -- prior to the accident was there one of
24 these get-together meetings where everybody talked
25 about and updated the manual?

1 MS. CONLAN: No.

2 CHAIRMAN BESHORE: Had the manual really been
3 updated after -- between Bayview's commissioning and
4 the accident on June -- June of '99?

5 MS. CONLAN: I'm sure that there were
6 revisions. I -- I couldn't tell you what they were,
7 but there were -- there were constant revisions to the
8 manual.

9 CHAIRMAN BESHORE: Do you know if those
10 revisions included a, you know, accounting for the --
11 the installation of this new facility?

12 MS. CONLAN: Yeah, we had -- we had -- I had
13 added Bayview to the operations manual like October of
14 '98.

15 CHAIRMAN BESHORE: Okay. So you added a --
16 would that be a chapter --

17 MS. CONLAN: Yes.

18 CHAIRMAN BESHORE: -- on Bayview Terminal?
19 In terms of the other chapters, were they gone through
20 and revised to reflect that something there may be
21 different in that particular section of the manual as a
22 result of Bayview?

23 MS. CONLAN: No.

24 CHAIRMAN BESHORE: But that -- and that would
25 have been based on somebody giving you input? You

1 weren't necessarily responsible for writing that?

2 MS. CONLAN: No.

3 CHAIRMAN BESHORE: You were responsible just
4 for updating it --

5 MS. CONLAN: Correct.

6 CHAIRMAN BESHORE: Okay. So who wrote the --
7 this -- the manual on -- the chapter that was added on
8 Bayview?

9 MS. CONLAN: I believe that it came from
10 different sources. Richard Claussen provided me with
11 the information.

12 CHAIRMAN BESHORE: Okay.

13 MS. CONLAN: But I don't know that he was the
14 author of the section. He may have been, but I'm not --
15 -

16 CHAIRMAN BESHORE: Okay. But you got the
17 information?

18 MS. CONLAN: Right.

19 CHAIRMAN BESHORE: I don't know that I'm
20 going to add -- attach this as an exhibit, but this is
21 a page that's been -- a section that's been provided by
22 -- to us already, and that's -- it's titled "Bayview
23 Terminal." Is that the chapter that you were talking
24 about that was -- that was added as a result of the --

25 MS. CONLAN: This is one section that was

1 added. Looks like maybe it's more than one section.
2 But this -- this was the format that I'd received it in
3 and then converted it over to put onto the intranet.

4 CHAIRMAN BESHORE: And you think that was
5 done in November of '98 or thereabouts?

6 MS. CONLAN: Yes.

7 CHAIRMAN BESHORE: Did you have any -- I'm
8 sorry. Let me rephrase that. Did anybody report to
9 you concerns that they had about the O & M manual? Was
10 -- after -- this is after Bayview was commissioned.
11 Did anybody -- did you get any feedback from anybody
12 about inadequacies they felt like that were in the
13 procedures?

14 MS. CONLAN: No.

15 CHAIRMAN BESHORE: Or concerns that they had
16 about it at all?

17 MS. CONLAN: No.

18 CHAIRMAN BESHORE: What about -- let me ask
19 you about training. As a new -- relatively -- as a new
20 employee in 1995, what kind of training did you -- did
21 you receive when you came to Olympic?

22 MS. CONLAN: Well, I was a temporary so there
23 really wasn't any training involved. As I got involved
24 in other areas such as -- you know, I -- I -- I would
25 do the job and somebody would check it until they were

1 comfortable that I knew how to do it. So it's more on-
2 the-job training than official training.

3 CHAIRMAN BESHORE: Okay. So most of your
4 training that you received for your career there was on
5 the job, is that correct?

6 MS. CONLAN: Yes.

7 CHAIRMAN BESHORE: Did you have any
8 formalized classroom tech training that you remember
9 receiving?

10 MS. CONLAN: No.

11 CHAIRMAN BESHORE: Let's -- let me ask you a
12 little bit about -- okay. We talked about the relief
13 valve. Do you remember any discussions about changing
14 the set points on the relief valve, working -- this is
15 a -- a specific -- the relief valve at Bayview, that --
16 any work that was done to the valve, that kind of thing
17 prior to --

18 MS. CONLAN: Prior to -- no.

19 CHAIRMAN BESHORE: How about since the
20 accident? Have you had conversations about --

21 MS. CONLAN: Well, I -- we provided
22 documentation regarding relief valve testing and
23 different things, and we put together -- I believe it
24 was an NTSB request -- the documentation showing that
25 the relief valve had been tested in November. It was

1 changed -- the set point was changed in December and
2 then changed again May of '99. But I wasn't involved
3 in any of that prior to June 10th.

4 CHAIRMAN BESHORE: Let me ask you about a --
5 a checklist here. I think I will go ahead and attach
6 this as an exhibit. I'll give you that.

7 (The document referred to was
8 marked for identification as
9 Conlan Exhibit 2 and was
10 received in evidence.)

11 CHAIRMAN BESHORE: Just for the record, this
12 other chapter I didn't -- let's go back here. But for
13 the -- for the record, this was provided previously as
14 pages 2535 through pages 2564 of the information that's
15 provided prior to this, and that's that procedure
16 section discussed.

17 So on this -- on this checklist there's been
18 some question about when that form was actually
19 prepared. Maybe you could help us to understand that,
20 Sandy. First of all, are you familiar with the
21 checklist?

22 MS. CONLAN: Yes.

23 CHAIRMAN BESHORE: -- seen that before?
24 Again, can you explain to us what -- well, first of
25 all, I guess the top line's dated one seven and eight

1 of '99.

2 MS. CONLAN: Correct.

3 CHAIRMAN BESHORE: The corner down at the
4 bottom, the form wasn't created till March of '99.

5 MS. CONLAN: Correct.

6 CHAIRMAN BESHORE: So maybe you could help us
7 understand what the discrepancies may mean here.

8 MS. CONLAN: The -- the form was printed from
9 the Internet -- intranet March 11th of '99, but the
10 inspection was performed January 7th and 8th. The only
11 thing that I can add to that is that it was I don't
12 want to say common practice, but -- but it had happened
13 before that they would fill out the form after -- if
14 there -- if -- during a station check they were -- they
15 found something that needed to be repaired many times
16 they would wait and fill out the entire form after it
17 was fixed, so they're giving you a -- a complete
18 checklist. We found this was a problem but now it's
19 fixed type of thing. And the only thing I can assume
20 is that that's what they had done.

21 CHAIRMAN BESHORE: Okay. So you don't recall
22 seeing any field notes, any documents that --

23 MS. CONLAN: No. This is what was handed to
24 me.

25 CHAIRMAN BESHORE: Okay. So that's all

1 you've seen. You didn't see any supporting
2 documentation on January 7th -- 7th and 8th?

3 MS. CONLAN: No.

4 CHAIRMAN BESHORE: Are those your -- your
5 initials? Or whose --

6 MS. CONLAN: Yeah, that means that I entered
7 it into our database saying that it was complete.

8 CHAIRMAN BESHORE: Okay. And you went down
9 basically each column -- or you went down the one
10 column and entered your initials in every --

11 MS. CONLAN: No, this is Dave Justice's
12 initials. My initials are down here.

13 CHAIRMAN BESHORE: Ah. Okay. So -- okay.
14 Down in the corner then you --

15 MS. CONLAN: Yeah.

16 CHAIRMAN BESHORE: -- you -- so you entered
17 the information into the database but Dave went through
18 each line item and -- and put his initials?

19 MS. CONLAN: Exactly.

20 CHAIRMAN BESHORE: To attest to the fact that
21 each of those had actually been done?

22 MS. CONLAN: Mm-hmm.

23 MR. HANSEN: Whose initials --

24 MS. CONLAN: Dave Justice.

25 CHAIRMAN BESHORE: Do you remember what was

1 going on in the -- on the days prior to the accident?
2 Say from, you know, the first five to, say, 10 days in
3 June? Do you remember anything that was going on?

4 MS. CONLAN: No.

5 CHAIRMAN BESHORE: Anything stand out in your
6 mind as abnormal?

7 MS. CONLAN: No.

8 CHAIRMAN BESHORE: Do you -- do you get the
9 aerial patrol reports from the pilots?

10 MS. CONLAN: Those are sent in to our right-
11 of-way office.

12 CHAIRMAN BESHORE: So that's handled through
13 the right-of-way office?

14 MS. CONLAN: I do the spot checks to make
15 sure that we have them.

16 CHAIRMAN BESHORE: Okay. So you check that
17 you -- make sure that you have those records for
18 compliance reasons?

19 MS. CONLAN: Right. And if we don't, if
20 we're missing something, then I just notify George
21 Guzman and he'll -- he usually has an explanation or
22 he's -- you know, he already has it, he just hasn't
23 sent it in.

24 CHAIRMAN BESHORE: Is George the right-of-way
25 --

1 MS. CONLAN: Right. George works out of
2 Woodinville, but he sends the documentation to Renton.
3 So just because it's not in the file doesn't mean it's
4 not complete.

5 CHAIRMAN BESHORE: Well, I guess I said --
6 what's his actual title? Do you know?

7 MS. CONLAN: I believe it's one called
8 coordinator.

9 CHAIRMAN BESHORE: Now, does he -- or do you
10 know -- if you don't know, just -- does he schedule the
11 airline pilot patrols or --

12 MS. CONLAN: No. The pilot has his own
13 schedule and he knows what the requirements are.

14 CHAIRMAN BESHORE: If he sees something
15 unusual he reports that back to whom?

16 MS. CONLAN: To George.

17 CHAIRMAN BESHORE: To George? And then
18 George disseminates that to the appropriate area
19 supervisor, is that --

20 MS. CONLAN: Correct.

21 CHAIRMAN BESHORE: -- correct?

22 MS. CONLAN: Not to the supervisor, to the --
23 the -- he'll get a hold of an operator out in the
24 field, and they'll go out and -- and look at the -- the
25 area.

1 CHAIRMAN BESHORE: Okay. As part of the --
2 well, as part of the documentation you provided was an
3 area patrol report from the day of the accident. Were
4 you familiar with that report?

5 MS. CONLAN: No.

6 CHAIRMAN BESHORE: Do you remember what was
7 going on the morning -- the day of June 10th?

8 MS. CONLAN: I believe that we had
9 representatives from I want to say GATS but I'm not
10 positive there, but -- but Frank Hopf had some people
11 in and they were touring the Bayview and north area.

12 CHAIRMAN BESHORE: Did they come into
13 headquarters?

14 MS. CONLAN: I think that they were there the
15 day before, but I'm not -- not positive.

16 CHAIRMAN BESHORE: Was that something you
17 were involved in?

18 MS. CONLAN: I was not involved in that. I
19 mean I think we had an e-mail regarding that, but I
20 don't recall.

21 CHAIRMAN BESHORE: How did you hear of the --
22 the -- well, first of all, did you hear of the spill
23 itself prior to ignition?

24 MS. CONLAN: Yes.

25 CHAIRMAN BESHORE: And how did you hear about

1 that?

2 MS. CONLAN: I was in my office and Ron
3 Brentson came by and told me that -- start the incident
4 command system, get a conference room ready because we
5 had a release up north. At that time I didn't know
6 where.

7 CHAIRMAN BESHORE: Okay. So he didn't really
8 give you details of what he knew of the spill?

9 MS. CONLAN: No, he was in a hurry. It was
10 more, get it ready, we had a release.

11 CHAIRMAN BESHORE: Oh, did you now -- did you
12 actually implement that incident or the response plan
13 or -- in other words, did you make any -- any emergency
14 notifications to anybody? Is that part of your role?

15 MS. CONLAN: It had been. I did not make any
16 notification calls for that release.

17 CHAIRMAN BESHORE: Do you remember what time
18 that might have been?

19 MS. CONLAN: Ron came into my office about
20 4:30, maybe a little after. 4:30, 4:35.

21 CHAIRMAN BESHORE: Do you remember how much
22 longer after that that, you know, it was actually
23 reported as a fire?

24 MS. CONLAN: I think we knew about it fairly
25 immediately. Just shortly after five I found out -- I

1 think it ignited at 5:02 or something like that.

2 CHAIRMAN BESHORE: But nothing -- nothing
3 stands out in your mind other than the tour of people
4 at Bayview about something that might have been going
5 on during the day there?

6 MS. CONLAN: No.

7 CHAIRMAN BESHORE: How about out in the
8 field? Any -- anything that people were doing?

9 (No response)

10 (Pause)

11 CHAIRMAN BESHORE: Let's talk a little bit
12 about -- about -- now, let me ask you -- let me ask you
13 a little bit -- how's Dan -- Dan to work for as a
14 manager?

15 MS. CONLAN: Kind of needy, but other than
16 that he was fine.

17 CHAIRMAN BESHORE: Okay. By -- by "needy,"
18 can you kind of elaborate, maybe, on that?

19 MS. CONLAN: Well, he -- I hate to talk bad
20 about him not here, but --

21 CHAIRMAN BESHORE: That's -- that's okay.
22 He's gone now --

23 MS. CONLAN: He -- yes, he is. He just
24 couldn't find anything. He needed my help with
25 everything. Frequently he'd start a project and I

1 would finish it. I had been in the department alone
2 until he came on board in July, and he didn't take on
3 any of my workload. It was more of a -- created more
4 for my -- of my workload. So --

5 CHAIRMAN BESHORE: So he was --

6 MS. CONLAN: He was more of a hindrance.

7 CHAIRMAN BESHORE: -- high-maintenance?

8 MS. CONLAN: High-maintenance, yes.

9 CHAIRMAN BESHORE: High-maintenance and he --
10 he created things for you to do?

11 MS. CONLAN: Mm-hmm.

12 CHAIRMAN BESHORE: Were they things that
13 needed to be done?

14 MS. CONLAN: Oh, definitely.

15 CHAIRMAN BESHORE: And it was just the two of
16 you in that department? Dan supervised that --

17 MS. CONLAN: He was responsible for right-of-
18 way issues also, and so in addition to the
19 environmental I had been doing I was also finishing up
20 right-of-way projects that he was responsible for, that
21 he had started.

22 CHAIRMAN BESHORE: Did you -- in your role,
23 did you have any -- any -- well, did you have any --
24 any role in terms of -- of investigating near-misses or
25 releases internally within Olympic?

1 MS. CONLAN: I was involved in many of the
2 near-miss investigations.

3 CHAIRMAN BESHORE: There wasn't done on --
4 there wasn't an investigation done on this accident in
5 June?

6 MS. CONLAN: No.

7 CHAIRMAN BESHORE: Do you know why?

8 MS. CONLAN: I had mentioned it, but because
9 of the -- the legal issues surrounding it it was put on
10 the backburner.

11 CHAIRMAN BESHORE: So who'd you mention it
12 to?

13 MS. CONLAN: Frank Hopf.

14 CHAIRMAN BESHORE: And I just want to kind of
15 get a little bit more detail on what his response to
16 you -- you was, that you remember?

17 MS. CONLAN: Just that we're going to have to
18 wait.

19 CHAIRMAN BESHORE: Was it in terms of waiting
20 or was it in terms of not doing it at all?

21 MS. CONLAN: It was in terms of waiting.

22 CHAIRMAN BESHORE: -- nothing's been done
23 internally that you're aware of --

24 MS. CONLAN: No, there has not.

25 CHAIRMAN BESHORE: -- at this point? Oh, did

1 -- did he give you a reason for the delay in doing this
2 or -- did he elaborate on that?

3 MS. CONLAN: No, he was -- I mean -- 'cause I
4 had asked him about this in June and in July of '99,
5 and he just put me off in June. And I don't know that
6 he ever really offered an explanation.

7 (Pause)

8 CHAIRMAN BESHORE: How was -- how was morale
9 at the office?

10 MS. CONLAN: After?

11 CHAIRMAN BESHORE: No, prior to June.

12 MS. CONLAN: I think it was okay.

13 CHAIRMAN BESHORE: Your morale was good?

14 MS. CONLAN: Oh, yeah.

15 CHAIRMAN BESHORE: Okay. But, you know,
16 was -- there wasn't -- you think that the morale was
17 more or less okay?

18 MS. CONLAN: Well, I think so. I mean I know
19 that there were people who had different issues and I
20 don't know what the issues were. I know there were
21 some people who were unhappy, but I don't -- you know,
22 I don't know why the -- there's always a feeling that
23 the field locations don't get the -- there's not the
24 communication with the field like there should be. And
25 I mean you're going to have that -- I mean, in my

1 opinion you're going to have that when you have four --
2 400 miles of pipeline and you have people at either
3 end. But those weren't my issues so I didn't -- I
4 personally didn't have any -- any issues.

5 CHAIRMAN BESHORE: Okay.

6 (Pause)

7 CHAIRMAN BESHORE: All right. I think I'm
8 going to go ahead and -- and -- more that I have and
9 see if Cliff has any questions.

10 MR. ZIMMERMAN: Yeah. I'd like to find out
11 -- the kind of discussions you might have had with
12 either Ron Brentson or others regarding finalizing
13 changes to the operations manual during 1998 and -- I
14 mean the -- the accident in 1999?

15 MS. CONLAN: I don't have any specific
16 recollection. I was -- part of Bayview was also
17 updating our -- response plan and so I worked with Ron
18 Brentson to obtain -- I can't think of -- information
19 for charts and different things. The lined fill
20 between, say, Anacortes and Bayview and then Bayview to
21 Allen because that chart needed to be updated. And so
22 it was updated in the -- the -- response plan.

23 MR. ZIMMERMAN: Were -- were there any other
24 issues besides those that Ron was maybe concerned about
25 changing that he wasn't sure about that other people

1 had brought up, maybe, that were controversial?

2 MS. CONLAN: Not that I can recall.

3 MR. ZIMMERMAN: Are you aware of any changes
4 that -- to the O & M manual that were proposed by
5 anyone but they weren't changed?

6 MS. CONLAN: No.

7 (Pause)

8 MR. ZIMMERMAN: That's all I've got for right
9 now.

10 CHAIRMAN BESHORE: Jerry?

11 MR. SCHAU: You're the only one that updates
12 the O & M manual on the intranet?

13 MS. CONLAN: Prior to June 10th, yeah. Todd
14 Smith has access and has modified things since June
15 10th.

16 MR. SCHAU: But only you and Todd?

17 MS. CONLAN: Yeah.

18 MR. SCHAU: You mentioned that there was --
19 there's a spiral notebook -- the -- spiral notebook or
20 what is supposed to be noted in the spiral notebook
21 when abnormal conditions are supposed to be noted.
22 Have you changed that procedure since June 10th, that
23 you're aware of?

24 MS. CONLAN: That whole section was revised,
25 and I thought that that was the procedure then. But it

1 may have been totally changed.

2 MR. SCHAU: That was my question. I was
3 trying to understand it and --

4 MS. CONLAN: Yeah.

5 MR. SCHAU: -- the way it's changed.

6 MS. CONLAN: I -- see, I thought it stayed
7 the same, but I wasn't positive.

8 MR. SCHAU: It sounded like you had this --
9 the spiral notebook hasn't changed?

10 MS. CONLAN: No. No. It's been there. Now,
11 whether it was used for abnormal conditions I'm not
12 positive. I thought it was.

13 MR. SCHAU: Okay. Just one other question.
14 You said that the O & M manual gets updated on a
15 continuous basis, basically. Is that correct?

16 MS. CONLAN: Yes.

17 MR. SCHAU: People just send you changes and
18 you just incorporate 'em then?

19 MS. CONLAN: Yes. Except for set points. I
20 don't -- I won't change a set point unless I get
21 authorization from engineering or at the time we had
22 leads for the electrical and -- and mechanics, and so I
23 would verify with them what the deal was.

24 MR. SCHAU: Okay. So let me restate that so
25 I understand. You had people that you went to that can

1 authorize the changes?

2 MS. CONLAN: Yeah.

3 MR. SCHAU: And they were the lead people --

4 MS. CONLAN: Yes.

5 MR. SCHAU: -- mechanics, the electricians --

6 MS. CONLAN: And engineers.

7 MR. SCHAU: -- and engineers. Okay. That's
8 how the procedure -- got updated?

9 MS. CONLAN: Right. If it was an alarm or
10 something then, you know, Todd Smith knows what the
11 alarm in the control center says so if it was that type
12 of thing then of course I would just take it from Todd.
13 I didn't need to go to another individual.

14 MR. SCHAU: Okay.

15 CHAIRMAN BESHORE: Johnny?

16 MR. PARRISH: Nothing.

17 CHAIRMAN BESHORE: Patti?

18 MS. IMHOF: Sandra, as compliance special --
19 specialist, would you say it was your job to manage,
20 like, logs or to maintain one?

21 MS. CONLAN: It was more to coordinate and
22 maintain. I would have contact with the field person
23 or the -- the group of people responsible for a
24 specific inspection and send out an e-mail saying, hey,
25 these inspections are due this month.

1 MS. IMHOF: And in -- in the kind of
2 information that you maintained them would you have
3 been familiar with excavation that happened along the
4 pipelines?

5 MS. CONLAN: No.

6 MS. IMHOF: Had you ever heard of IMCO
7 General Construction, my company, prior to us being
8 named as the possible -- to reset the pipe?

9 MS. CONLAN: No.

10 CHAIRMAN BESHORE: Peter?

11 MR. KATCHMAR: Yes. Are you on the Olympic
12 -- all Olympic employees list for e-mail in the
13 company?

14 MS. CONLAN: Yes.

15 MR. KATCHMAR: And I guess were you put on
16 there as soon as you began full-time?

17 MS. CONLAN: I was put on before --

18 MR. KATCHMAR: Okay.

19 MS. CONLAN: -- that point. January, I
20 guess, of '96.

21 MR. KATCHMAR: Okay. And when you get e-
22 mails do you read every -- each and every one of 'em?

23 MS. CONLAN: Typically.

24 MR. KATCHMAR: Typically, okay. And the
25 reason I'm asking is that -- that -- that e-mail from

1 Ron Grenwich about the relief valves was sent to all
2 Olympic employees and I was just wondering, you know,
3 if you remember that particular e-mail?

4 MS. CONLAN: No.

5 MR. KATCHMAR: Okay. It didn't jog anything
6 in your mind to say, I just got a DOT report that said
7 somebody set it at this pressure and now they're
8 setting it at a different pressure or something like
9 that?

10 MS. CONLAN: I don't recall.

11 MR. KATCHMAR: Okay. That's it for me.

12 CHAIRMAN BESHORE: Geoff?

13 MR. SMYTH: I have just a couple of quick
14 ones. You said you were trained as a one-call
15 special -- was that specialist coordinator?

16 MS. CONLAN: Just to handle one-calls as they
17 come in.

18 MR. SMYTH: And so to handle one-calls into
19 the main office?

20 MS. CONLAN: Correct.

21 MR. SMYTH: And then you also mentioned that
22 George Guzman was the one-call coordinator. So what
23 was his -- what would his function be, then?

24 MS. CONLAN: As the one-calls come in they
25 come over a printer. He looks to see if there's a

1 conflict. If there is then he faxes that out to the
2 field location closest to where that work is being
3 performed. If it's an emergency then he pages somebody
4 or calls 'em on our radios to have 'em go out and take
5 a look and mark our pipelines.

6 MR. SMYTH: And so that -- the person that he
7 would send out would be from the field crew --

8 MS. CONLAN: Yeah.

9 MR. SMYTH: -- for specific areas?

10 MS. CONLAN: Yeah.

11 MR. SMYTH: And do you know back in 1996 or
12 1997 who -- who that might have been for the area in
13 Bellingham?

14 MS. CONLAN: We've had the same operators up
15 there, Kevin Wittmer and Ken Roberts, but that doesn't
16 mean that somebody else didn't do the -- do a one-call
17 in that area during that time.

18 MR. SMYTH: And then but you -- you then
19 maintained the one-call logs --

20 MS. CONLAN: In the -- in the right-of-way
21 office. We do have them. I do not maintain those.
22 George maintains those.

23 MR. SMYTH: Okay. And you also said you
24 maintained inspection logs, is that correct?

25 MS. CONLAN: Yes.

1 MR. SMYTH: Now, is that inspections that the
2 pipeline company initiates through some -- through any
3 action? It could -- it could be from a smart-pig or it
4 could just be from a annual it's time to go inspect
5 something.

6 MS. CONLAN: These would be DOT-required
7 inspections.

8 MR. SMYTH: Are you aware of any inspection
9 logs that were generated from the construction project
10 up in Bellingham?

11 MS. CONLAN: Prior to the accident, no.

12 MR. SMYTH: Prior to the accident. Do you
13 know of any type of inspection logs that might -- that
14 your company would have when a third party's going to
15 work near your pipeline? Do you have someone that
16 would be there and then you would have a log of that
17 individual being there?

18 MS. CONLAN: There would be a diagram of
19 change. If somebody is -- another utility is crossing
20 us or near us in our easement, the person out in the
21 field is supposed to write up the document showing
22 where this new utility is in relation to our pipeline
23 and we try to get that on our line sheets.

24 MR. SMYTH: Okay. So that's like a one --
25 you know, those types of incidents can take months to

1 accomplish, so what -- do you just have one document
2 from that incident or would you have daily logs of
3 somebody being on-site? Are you aware of --

4 MS. CONLAN: We would just have -- I'm aware
5 of the one log. Now, what the operator keeps I don't
6 know. They may have a full file on it, but I -- I'm
7 not aware of what's --

8 MR. SMYTH: So if someone was on-site every
9 day while a third party was crossing your line you
10 wouldn't keep track of those logs? That would be
11 something that you were not --

12 MS. CONLAN: I am not aware of those, no.

13 MR. SMYTH: You would just get the last sheet
14 that would come in?

15 MS. CONLAN: They wouldn't even come to me.

16 MR. SMYTH: Okay.

17 MS. CONLAN: They go to our engineering
18 department and our right-of-way department. So they're
19 -- they're a -- a required document but I don't
20 maintain those.

21 MR. SMYTH: Okay. So you don't maintain
22 those specific documents?

23 MS. CONLAN: No.

24 MR. SMYTH: No more questions. Thanks.

25 CHAIRMAN BESHORE: Linda?

1 MS. PILKEY-JARVIS: Thanks. Hi, Sandy.

2 MS. CONLAN: Hi.

3 MS. PILKEY-JARVIS: I just -- I just wanted
4 to clarify a couple of the responses that you've had.
5 You -- you talked about that your job has been to
6 maintain the manuals on the intranet.

7 MS. CONLAN: Mm-hmm.

8 MS. PILKEY-JARVIS: I don't know what your
9 background is, you know, about computer knowledge or
10 technology, but do you know by any chance what the
11 operating capacity of your computer is that sits on
12 your desk?

13 MS. CONLAN: I have no idea.

14 MS. PILKEY-JARVIS: I also wondered if you
15 could go back and talk more specifically about the
16 period of time from July to September when you were
17 working in the control room and -- and tell us about
18 the specific training that you had during that time
19 period?

20 MS. CONLAN: There's a controller training
21 handbook. There was at that time. And I, you know,
22 read that but it deals a lot with hydraulics and -- and
23 different things and it's a lot of information to
24 absorb at one time. So I would go back and verify
25 things or, you know, if something comes up like I read

1 that before where type of thing and go back and read
2 that.

3 But other than that manual, you -- you sit
4 there and you're running the pipeline with somebody
5 next to you. And every day they just explain what
6 you're doing, and they want you to do it from day one
7 but they're there to -- and so you don't necessarily --
8 at least with my training, you didn't necessarily
9 understand what you were doing but every day you
10 started to understand more and more. But that -- that
11 was what the training consisted of with me.

12 MS. PILKEY-JARVIS: Who was your "guy"? Who
13 was your --

14 MS. CONLAN: Dave Smith. And Mike Ransom.
15 Dave mainly.

16 (Pause)

17 MS. PILKEY-JARVIS: Did you -- were there
18 differences in the way that Dave versus Mike trained
19 you?

20 MS. CONLAN: Yes.

21 MS. PILKEY-JARVIS: What -- can you tell us
22 about that?

23 MS. CONLAN: And I don't recall specifics,
24 but they -- they would come up with I think it was a
25 time of when a batch change was going to occur or

1 something. I don't remember exactly. But Dave did it
2 one way and Mike did it another way, and they were --
3 their numbers were very close but they may vary by a
4 minute or two. And so it -- because Dave trained me
5 originally and I was with him most of the time it
6 really threw me off when I was with Mike because Mike
7 and I would never come up with the same answer because
8 I was doing it Dave's way. So that was -- that was an
9 issue.

10 But they were -- they were very close. But
11 not exact and I wanted to see that.

12 MS. PILKEY-JARVIS: Okay.

13 (Pause)

14 MS. PILKEY-JARVIS: I know that you work on
15 the environmental end on the contingency plan, the
16 response plan. Can you tell us a little bit about what
17 has been done within Olympic to have the controllers
18 become familiar with the emergency response stuff, in
19 particular if an incident were to occur, you know,
20 during non-working hours when just controllers are
21 there?

22 MS. CONLAN: We have a field document that
23 was totally revised in January or February of this
24 year. And we've had training. That's a document
25 that's updated quarterly, and we train the employees on

1 them. Initially, we trained everybody on it.
2 Sometimes it's hard to do that, so what we do is we
3 make sure that the majority of the people are trained
4 but the supervisors are trained so that they can go
5 over the differences in the new document with the
6 employees that weren't able to attend the training for
7 one reason or another.

8 MS. PILKEY-JARVIS: So that -- I just -- I
9 need to clarify. So -- prior to June 10 you, it sounds
10 like, had sort of continuous training on the field
11 document?

12 MS. CONLAN: That was after. This is --

13 MS. PILKEY-JARVIS: Oh, okay.

14 MS. CONLAN: -- this year. Now, initially,
15 when they -- I was not here when they rolled out the
16 brand new contingency plan but I understand that they
17 had training on that and that the employees -- all the
18 employees were trained. But again, I wasn't here then
19 so I don't know exactly what was done.

20 MS. PILKEY-JARVIS: If a training is
21 scheduled, and just using the contingency plan as an
22 example, is -- is it mandatory that people attend or
23 you only attend if you're on schedule that day?

24 MS. CONLAN: It depends on what's going on.
25 You know, you can't stop a batch change because there's

1 a training session going on. But you try to -- to get
2 those employees who missed the training.

3 We also have required drills every year and
4 we have training before the drill. And we get --
5 different people involved each time. The control
6 center also -- actually, even prior to January of this
7 year they had a -- a yellow form that they filled out
8 if there was a release or a report of suspected
9 release. That's gone away with the new field document,
10 so they've always had a program -- the control center's
11 always had a program in place to document.

12 MS. PILKEY-JARVIS: What -- what is your
13 understanding of the purpose for adding Bayview as a
14 terminal to the pipeline?

15 MS. CONLAN: I understood that you could --
16 it would change the batching where you could have
17 larger batches of product.

18 MS. PILKEY-JARVIS: It sounds -- in a couple
19 of the answers that you've made, it sounds like you've
20 done a lot of sort of compiling of information to
21 respond to this investigation. I was just curious
22 about whether -- well, how -- where you had mostly
23 looked for documents. Or is it -- is there a main
24 filing system at the Renton facility, for example? Or
25 do people keep individual files?

1 MS. CONLAN: It -- it depends on -- on what
2 documents people are requesting. A lot of the requests
3 had to do with Scata, alarms, and history. You'd only
4 go to our Scata person for that. If it was, you know,
5 information regarding a valve, we looked in the files
6 for valve inspections.

7 But I didn't look for, you know, things in
8 people's planners, but -- but everybody was aware of
9 the different requests and so each individual -- you
10 know, we had -- like the NTSB, they had 26 items on
11 their request and we just assigned different people to
12 the -- to the topics and then I just had to follow up
13 and make sure that they got me the information.

14 MS. PILKEY-JARVIS: Just one last area here.
15 This is concerning the internal inspections and the
16 E.B. Slew spill where a lot of these internal
17 inspections were done around and Department of Ecology
18 was involved. Did you attend meetings with Ecology and
19 Olympic Pipeline discussing E.B. Slew? Were you
20 involved in sort of internal discussions within the
21 company that -- where they talked about the different
22 internal inspections and sort of made comparisons
23 between what they found or -- and made decisions about
24 how they were going to respond?

25 MS. CONLAN: No.

1 MS. PILKEY-JARVIS: Okay. That's all.

2 Thanks.

3 CHAIRMAN BESHORE: Tony, could you introduce
4 yourself since you weren't here when we --

5 MR. BARBER: Yes. I'm Tony Barber, as you
6 know, with the EPA, as you know. And Allen, I don't
7 have any further questions.

8 CHAIRMAN BESHORE: Okay. Jim?

9 MR. CASH: Hi. I'm Jim Cash with the Safety
10 Board. I missed the introductions, too.

11 I just have a couple questions. The -- the
12 intranet, it's just internal only?

13 MS. CONLAN: Yes.

14 MR. CASH: So coming from the outside you
15 wouldn't be able to get access to --

16 MS. CONLAN: No.

17 MR. CASH: How does the average employee get
18 to the intranet?

19 MS. CONLAN: It's through Windows Explorer.

20 MR. CASH: Okay. Is that true in the control
21 room also?

22 MS. CONLAN: Yes. It's an icon on the
23 desktop. You would double-click and it takes you -- at
24 that time it took you to our intranet.

25 MR. CASH: Okay. Is that on the -- the

1 machine that's running the -- the actual Scata screens
2 or is that --

3 MS. CONLAN: No.

4 MR. CASH: -- an additional --

5 MS. CONLAN: We have a separate Web server
6 for -- I don't know what all is on this computer, but
7 it's -- it's a different computer.

8 MR. CASH: No, no. I mean the controllers
9 themselves. Do they have a -- do they have a separate
10 display terminal that they would get at that?

11 MS. CONLAN: Oh. Yeah, they have an actual
12 computer that -- that takes 'em to the network. And
13 then they have their -- their other screens to run the
14 pipeline.

15 MR. CASH: Okay. Do you keep track of hits
16 on the intranet, do you know?

17 MS. CONLAN: No.

18 MR. CASH: So you don't know who accesses it
19 or how many times it's been accessed?

20 MS. CONLAN: No.

21 MR. CASH: Okay.

22 MR. SAGER: I'm Eric Sager. I'm with the
23 Safety Board. Can you search for key words -- search
24 the operation manual -- operating manual?

25 MS. CONLAN: You can if you know how. I

1 would seriously doubt if 95 percent of the people would
2 know how.

3 MR. SAGER: Could you tell us how?

4 MS. CONLAN: If you're -- it's -- there's
5 frames, and so you have to click in the frame that you
6 want to search and you can do a Control + F, which is
7 for "find." Type in the word and it'll find it for
8 you. But that's as far as the searching goes that I'm
9 aware of.

10 MR. SAGER: And how complex is it to type in
11 a frame?

12 MS. CONLAN: It's not complex at all if you
13 have -- if you have access to it. The intranet you --
14 someone just viewing it, you cannot modify it at all.
15 You have to open up that file from the web server,
16 modify it, save it, and then the change is there.

17 MR. SAGER: And that's the only way you can
18 find a key word search items in the manual?

19 MS. CONLAN: You can do it right from the
20 intranet but you can't -- you're just typing into a
21 window and it finds the word you're looking for, but
22 you cannot modify the text that's there.

23 MR. SAGER: I understand.

24 MS. CONLAN: Okay.

25 MR. SAGER: I was just talking in terms of

1 finding something.

2 MS. CONLAN: Oh. Yeah, it's not difficult
3 but we haven't -- we haven't trained on that, for
4 instance. I don't know that anybody really knows that
5 they can do that.

6 MR. SAGER: By "anybody" you mean
7 controllers?

8 MS. CONLAN: The controllers may know, but
9 the field people probably do not.

10 MR. SAGER: You think the controllers know?

11 MS. CONLAN: They may. I don't know what
12 their -- their computer experience or expertise is.

13 MR. SAGER: But there was no training for
14 that?

15 MS. CONLAN: No.

16 MR. SAGER: No -- what information resources
17 were available to controllers at the time of the June -
18 - that June 10th -- on June 10th?

19 MS. CONLAN: Resources as far --

20 MR. SAGER: For the job. How to do the job,
21 whatever.

22 MS. CONLAN: I'm not -- they have a -- an SOP
23 in -- in the control center, which is just standard
24 operating procedures. I -- I have no idea what
25 procedures are in there. They have, you know, the

1 operations, maintenance, and procedure manual. They
2 have the product spec manual in there. They have the
3 contingency plans in there. But how to run the
4 pipeline, I'm not -- I'm not sure what all they have.

5 MR. SAGER: Have you ever looked in the
6 standard operating procedures manual?

7 MS. CONLAN: Three years ago but I couldn't
8 tell you what's in there.

9 MR. SAGER: Is that because it's changed or
10 because you just don't recall?

11 MS. CONLAN: I just don't recall.

12 MR. SAGER: Whose idea was it to put the
13 operating -- the operation and maintenance manual on
14 the intranet?

15 MS. CONLAN: I'm not sure. It was either Ron
16 Brentson or Frank Hopf.

17 MR. SAGER: And how did you become involved
18 with it?

19 MS. CONLAN: I came out of the control
20 center, and they said -- they had asked me to do it.

21 MR. SAGER: "They" being?

22 MS. CONLAN: "They" Ron Brentson.

23 MR. SAGER: Do you know what they were trying
24 to accomplish?

25 MS. CONLAN: No. I mean the -- the plan was

1 to put all of our manuals on the intranet, so they
2 wanted to start with that manual to make it easier for
3 everybody to gain access to it. Easier for revisions,
4 different things like that.

5 MR. SAGER: Who is the person responsible for
6 that operation -- operating and maintenance manual?

7 MS. CONLAN: I think it would be, you know,
8 each individual person, really. I mean I don't know
9 that it's been defined who's responsible for it. I've
10 been the one responsible for updating it, but really,
11 it's everybody's responsibility. If -- if they see
12 inaccurate information they need to get -- get up --
13 get it updated and send it in to me, and they know
14 that. But I don't know that they've actually been
15 told, "It's your responsibility."

16 MR. SAGER: Do you screen this information
17 when you get it from them?

18 MS. CONLAN: I mean I -- when I'm putting a
19 revision in there I'm look -- I look at what the data
20 is. I don't change a set point without, you know,
21 somebody authorizing it. So most of the changes aren't
22 major changes.

23 MR. SAGER: Have you had any training in
24 preparing these kinds of manuals?

25 MS. CONLAN: No, I learned by doing.

1 MR. SAGER: Do you know why you were
2 selected?

3 MS. CONLAN: No.

4 MR. SAGER: You made the remark that you
5 heard some hall-talk, problems at Bayview. And I don't
6 mean to put words in your mouth here, but my
7 recollection is that you said that it didn't mean
8 anything to you.

9 MS. CONLAN: I didn't understand what they
10 were talking about. And so, I mean I don't -- I don't
11 even remember what the comment was. It was something
12 about Bayview and --

13 MR. SAGER: Do you remember when this comment
14 was heard?

15 MS. CONLAN: I don't.

16 MR. SAGER: Would it have been prior to or
17 after you did the manual, the operating --

18 MS. CONLAN: It would have been after.

19 MR. SAGER: When you did the manual were you
20 given -- were you doing other things, other projects?

21 MS. CONLAN: I was doing the environmental-
22 type work, hazardous waste disposal, emergency
23 response.

24 MR. SAGER: How important a priority was this
25 operating --

1 MS. CONLAN: Oh, it was a --

2 MR. SAGER: -- and maintenance manual?

3 MS. CONLAN: -- it was a definite priority.

4 I mean that was --

5 MR. SAGER: According to who?

6 MS. CONLAN: Ron Brentson. And that probably
7 came from Frank Hopf, but I'm not --

8 MR. SAGER: And what was the priority?

9 MS. CONLAN: That we just need to get it done
10 ASAP.

11 (Pause)

12 MR. SAGER: Is the spiral notebook considered
13 an information resource tool --

14 MS. CONLAN: I don't know that it's
15 considered an -- no, I don't believe so. I mean it's
16 used to document abnormal conditions. I don't know --
17 I mean you can certainly look back and see things that
18 have been documented in the past.

19 MR. SAGER: When you were working on the
20 manual, were you directed by anyone not to put
21 information in the manual?

22 MS. CONLAN: No.

23 MR. SAGER: When you were in training as a
24 controller, you said Dave Smith was one of your
25 trainers?

1 MS. CONLAN: Mm-hmm.

2 MR. SAGER: And who was the other trainer?

3 MS. CONLAN: Mike Ransom.

4 MR. SAGER: And who is Dave Manley?

5 MS. CONLAN: Who?

6 MR. SAGER: Dave Manley? Doesn't ring --
7 doesn't ring a bell? Okay.

8 (Pause)

9 MR. SAGER: In answering a question you were
10 asked earlier about Bayview, why it was -- why it was
11 constructed, you gave two possible explanations for it,
12 that you -- it was your understanding for that
13 station -- to increase the size of batches.

14 MS. CONLAN: Mm-hmm.

15 MR. SAGER: How would it do that?

16 MS. CONLAN: I don't know. I mean,
17 theoretically, you could -- you could be pumping, you
18 know, a 10,000-barrel batch and then take more product
19 out of a tank to put with that batch so you could
20 increase that batch size. But I don't -- I don't have
21 anything to do with scheduling or -- or -- forecasting
22 or any of that.

23 MR. SAGER: All right. And how would you
24 know that it would do -- do this, that it could
25 increase the size of the batches? That Bayview would

1 increase the size of batches?

2 MS. CONLAN: That -- it was explained to me,
3 but I don't remember by who.

4 MR. SAGER: You don't remember who
5 explained --

6 MS. CONLAN: I -- that was -- no, I don't.

7 MR. SAGER: Maybe it was --

8 MS. CONLAN: It may have been Craig. It -- I
9 mean there may have been -- may have been one of a
10 number of people.

11 MR. SAGER: Would this explanation have been
12 after you wrote the section on -- on Bayview for the
13 manual?

14 MS. CONLAN: I didn't write any sections for
15 Bayview.

16 MR. SAGER: Or you inputted?

17 MS. CONLAN: That's just -- I mean that's
18 taking a -- a Word file and converting it to html and
19 putting it on the intranet. It doesn't mean that I
20 understood any of the information that was on that.

21 MR. SAGER: Who selected the format for the
22 information that's in the operating and maintenance --

23 MS. CONLAN: We had taken the information
24 from the hard copy of the manual, and I worked with Dan
25 Slotman, our computer person, to come up with the

1 design.

2 MR. SAGER: Did you use any guidelines for
3 that design or any other operating manuals?

4 MS. CONLAN: No.

5 MR. SAGER: That's all I have. Thank you.

6 CHAIRMAN BESHORE: Let's see. I have one
7 follow-up question. I just want to make sure. I know
8 that -- I think you've already answered this, but on
9 the -- the changes and updates to the O & M manual,
10 they didn't require Frank Hopf to approve these, any
11 changes? They could be made without any approval by,
12 quote, "upper management"?

13 MS. CONLAN: Correct.

14 CHAIRMAN BESHORE: Okay.

15 MS. CONLAN: But again, if it were a set
16 point --

17 CHAIRMAN BESHORE: Right. I -- I -- set
18 points you made sure you ran past somebody?

19 MS. CONLAN: Yes.

20 CHAIRMAN BESHORE: The appropriate person?

21 MS. CONLAN: Right.

22 CHAIRMAN BESHORE: That would know whether
23 that set point was accurate?

24 MS. CONLAN: Correct.

25 CHAIRMAN BESHORE: But you didn't necessarily

1 send all proposed changes to Ron or to Frank or
2 somebody specific and -- to approve before they were
3 incorporated in the manual?

4 MS. CONLAN: No. If I had a question about
5 something, you know, I would ask Ron or Richard
6 Claussen. They were always very good resources. But
7 no, nothing was approved prior to.

8 CHAIRMAN BESHORE: Okay. Eric, did you --
9 does anybody else have any follow-up questions? Cliff?

10 MR. ZIMMERMAN: Sandra, how many meetings did
11 you attend on the E.B. Slew accident?

12 MS. CONLAN: I remember one with Steve Hunter
13 and Gary Lee. There may have been another, but I don't
14 recall.

15 MR. ZIMMERMAN: Who -- what are their jobs,
16 Steve Hunter and Gary Lee?

17 MS. CONLAN: They're both at the Department
18 of Ecology. I believe Steve is head of spill response
19 and Gary Lee is -- I know he's an engineer also in
20 spill response.

21 MR. ZIMMERMAN: Do -- do you contend or do
22 you know of any internal discussions at Olympic about
23 those accidents?

24 MS. CONLAN: Well, we had the post-accident
25 review, and I was involved in that. But as far as

1 meetings, I can't recall being involved in any
2 meetings.

3 MR. ZIMMERMAN: Who was at the post-accident
4 review --

5 MS. CONLAN: I -- I don't remember. I know
6 that representatives of Ecology were there. The people
7 involved in the response were there.

8 MR. ZIMMERMAN: Would you characterize it as
9 a large meeting, then? Were there --

10 MS. CONLAN: Yes.

11 MR. ZIMMERMAN: Let me see if I can recall --
12 if you can recall if any specific people were there.
13 Was Richard Claussen there?

14 MS. CONLAN: I don't recall, but he typically
15 would be.

16 MR. ZIMMERMAN: How about Frank?

17 MS. CONLAN: Frank Hopf would be there, yeah.

18 MR. ZIMMERMAN: Okay. And how about Doug
19 Beu?

20 MS. CONLAN: Doug wasn't there. Doug didn't
21 start until '97.

22 MR. ZIMMERMAN: Okay.

23 MS. CONLAN: Lonnie News was the operations
24 manager at that time, and he most likely would have
25 been there.

1 MR. ZIMMERMAN: I wonder if you could recount
2 the -- your recollection of the discussion during that
3 meeting and I want you to specifically think about any
4 discussion that they might have had on buckles or bends
5 that were there and could be a problem -- portions of
6 the pipeline?

7 MS. CONLAN: I don't recall any of that. I
8 mean the cause of the E.B. Slew was a buckle, but I
9 don't recall any -- any other conversation surrounding
10 that. Other than the buckle was located very close to
11 a weld.

12 MR. ZIMMERMAN: Okay. Thank you.

13 CHAIRMAN BESHORE: Linda?

14 MS. PILKEY-JARVIS: I just wanted to follow
15 up on your -- your response to the question about
16 training during July to September when you were in the
17 control room. It just kind of struck me thinking about
18 your -- your response afterwards about you were trained
19 primarily by one person but occasionally by another.
20 And it doesn't sound like there was a lot of formality
21 to how you were trained. And so what I'm wondering
22 about is how -- how would it be determined that
23 somebody was done with their training period and
24 capable to be a controller on their own?

25 MS. CONLAN: There's a checklist and a test

1 that you have to take. And I haven't seen the test.
2 But it -- I know that it asks you how you would respond
3 to certain conditions.

4 MS. PILKEY-JARVIS: And the checklist is?

5 MS. CONLAN: Something that your trainer has
6 for -- I've never seen a checklist either. But I know
7 that there's something out there that -- that they do
8 go by to make sure that somebody is training them and
9 is certified to run a line on their own.

10 MS. PILKEY-JARVIS: So it's your
11 understanding that the checklist is a guide to be used
12 by the person who's doing the training to make sure
13 that certain topics are covered?

14 MS. CONLAN: Yeah.

15 MS. PILKEY-JARVIS: Okay. Thanks.

16 CHAIRMAN BESHORE: I just thought of another
17 question. Let's go back to right as you were notified
18 of the accident. You were instructed to get the
19 conference center and what happened at that time?

20 MS. CONLAN: Well, I started getting -- we
21 have -- poster-sized copies of the 201 form, and so we
22 started getting all those out and the T cards and
23 different things. And phones set up and computers and
24 just waited. I mean I helped to field press calls and
25 different things until our -- our PR person got there.

1 And we just waited. And there wasn't anything that we
2 could respond to at that point.

3 CHAIRMAN BESHORE: Who was incident
4 commander?

5 MS. CONLAN: Frank Hopf.

6 CHAIRMAN BESHORE: And what -- he wasn't at
7 the station, though, correct?

8 MS. CONLAN: He was back in Renton, and then
9 he and Richard Claussen -- we ordered a helicopter to
10 fly them up there. He and Richard Claussen went up
11 there, and they left some time after six or seven,
12 something like that.

13 CHAIRMAN BESHORE: And he was the incident
14 commander from the very beginning?

15 MS. CONLAN: Frank?

16 CHAIRMAN BESHORE: Frank -- regardless of the
17 fact that he wasn't right there, he was still the
18 incident commander?

19 (Pause)

20 MS. CONLAN: You know, I don't know 'cause I
21 thought he was there in Renton, but I -- I know that he
22 was also in Bayview so he must have been traveling
23 back. I -- I remember seeing him there that night, but
24 --

25 CHAIRMAN BESHORE: All right. Is there

1 anything else that we haven't asked you about that you
2 feel we should know about or that may be of interest to
3 us in our investigation?

4 MS. CONLAN: Not that I can think of.

5 CHAIRMAN BESHORE: Okay. Well, thank you,
6 Ms. Conlan.

7 MS. CONLAN: You bet.

8 (Whereupon, the witness was excused.)

9 CHAIRMAN BESHORE: Go off the record.

10 (Whereupon, at 12:10 p.m., the hearing was
11 adjourned for lunch, to reconvene at 1:00 the same
12 day.)

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PIPELINE COMPANY
 2319 LIND AVE. S.W.
 P.O. BOX 1800
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MAY 27 1997

DEPT. OF ECOLOGY

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 WESTERN REGION
 1800 W. COLFAX AVE.
 SPOKANE, WY 83401

DOT/RSPA
 OFFICE OF
 PIPELINE SAFETY

May 22, 1997

Certified Mail

Paul O'Brien
 Department of Ecology
 Northwest Regional Office
 3190 160th Ave. SE
 Bellevue, WA 98008-5452

RE: Administrative Order #DE 96CP-N269

Dear Paul:

As we discussed at our May 16th meeting at your offices, Olympic Pipe Line Company submits the following in response to the administrative order dated September 17, 1996 and follow up letter dated March 13, 1997. For reference, the remaining open items covered by this letter are described below:

Original Order September 17, 1996

Item #3

Within 30 days of receipt of this Order, Olympic Pipe Line must submit a schedule satisfactory to Ecology for a comparative analysis of caliper tool data and construction drawings for the entire pipeline system to identify any discrepancies between the two. In order to accomplish this analysis, Olympic Pipe Line must run the caliper tool through those pipeline sections of which data does not exist.

Item #4

Within 30 days of completion of the scheduled analysis in item 3 above, Olympic Pipe Line must submit a report to Ecology. This report must identify where there are any discrepancies between the caliper tool data and the pipeline field inspections of the pipeline. Olympic Pipe Line must provide a schedule satisfactory to Ecology for conducting any necessary inspection work.

Item #5

Olympic Pipe Line must continually monitor and record data from the two strain gauges recently placed on the 16" and 20" pipelines at the south Ebey Slough crossings after the spill. Within 180 days of receipt of this Order, Olympic Pipe Line must submit a report on the results of this monitoring effort including any finding that might affect the integrity of the pipeline or pipeline operations in a manner that may result in future releases to waters of the state. The report must also contain specific recommendations for follow-up and/or corrective actions.

Item #7

Within 90 days of receipt of this Order, Olympic Pipe Line must submit detailed map(s) illustrating the pipeline location at all major river and stream crossings. The map(s) must also verify that the pipeline markers at all of the crossings are properly located.

From follow up letter dated March 13, 1997:

Item #3 and #4 additions "Ecology looks forward to the submission of an analytical report of the caliper pig runs by April 1, 1997, which includes any anomalies identified by the tool and a schedule of any necessary follow-up field work."

Exhibit Coulan #1

Item #5 additions "... Ecology will still need to have item #5 of the Order satisfied through the submission of a report interpreting the data collected by the strain gauges. Of particular interest to Ecology is the long term effects of strain on the large diameter pipes."

Item #7 additions "OPLC submitted a series of maps to satisfy item #7 of the Order. However, Ecology will still need to have OPLC describe what methods were used to locate the pipeline at all major river and stream crossings."

Olympic Pipe Line Company's response to items 3 and 4

The following pipelines were internally inspected for internal geometry using technology supplied by Enduro Pipeline Services, Inc. This inspection of completed between January 12, 1997 and January 23, 1997:

1. Ferndale to Allen 16" pipeline	37.4 miles,
2. Anacortes to Allen 16" pipeline	8.5 miles,
3. Allen to Renton 16" pipeline	76.0 miles,
4. Allen to Renton 20" pipeline	76.2 miles,
5. Renton to Seattle 12" pipeline	12.0 miles,
6. Renton to Sea-Tac 12" pipeline	<u>5.5 miles.</u>

Total length of line inspected 215.6 miles

The final report from the Enduro Pipeline Service, Inc. was received by Olympic Pipe Line Company on March 26, 1997. After a review of the inspection report Olympic Pipe Line Company began the exposing various locations beginning in early April 1997.

The Enduro Pipeline Services, Inc. tool inspects pipe for internal geometric deformities and an attachment tool detects the approximate bend angle in pipe fittings, hot bends and all but the long radius field bends. Many of the bends in the Olympic Pipe Line system (and all cross-country pipelines) are long jointed cold bends which were field bent using techniques still favored today. The tool used to field bend pipe uses hydraulically rams and shaped shoes to carefully bend the pipe to conform to the required alignment. This process involves inelastically deforming the pipe in a controlled manner such that the roundness and ultimate strength of the pipeline is preserved. The smallest radius bend allowable is determined by the pipe diameter as per the American Society of Mechanical Engineers (ASME) code 31.4 -1992 Edition, 406.2.1 - "Bends Made From Pipe".

In analyzing anomalies in pipelines, the ASME B31.4 - 1992 Code, Edition 451.6.2 "Disposition of Defects" is used to determine the limits of acceptability and disposition of imperfections of various size pipe. Under this section the guideline states:

- (1) Gouges and grooves having a depth greater than 12.5 % of the nominal wall thickness shall be removed or repaired.
- (2) Dents meeting any of the following conditions shall be removed or repaired:
 - (a) dents which affect the pipe curvature at the pipe seam or at any girth weld;
 - (b) dents containing a scratch, gouge, or groove; or
 - (c) dents exceeding a depth of .250" (6 mm) in pipe with a nominal pipe size (NPS) 4" or smaller, or 6% of the nominal pipe diameter in sizes greater than NPS 4".
- (3) The guideline also identifies the criteria for repair of areas of General Corrosion and Localized Corrosion and defines "Allowable Pipeline Repairs" and "Repair Methods For Corrosion Defects". These defects are generally detected with the magnetic flux inspection tool.

Olympic Pipe Line Company strictly follows ASME B31.4 - 1992 Edition 451.6.2 repair guidelines, and may also make repairs to lesser defects, depending on the individual anomaly. All lesser defects are evaluated for repair by a member of Olympic's Engineering group who consider location, sharpness and appearance of the defect, location of the seam or joint welds, and other factors that influence stress at the location of the defect. Data obtained from the current excavation locations will be used to make a decision whether to continue or discontinue excavation of lesser defects.

The attached chart shows the segments and location, the defect as identified by the inspection contractor, Enduro Pipeline Services, Inc., what we actually found, our scheduled or actual investigation date, actions planned or taken and planned or actual completion date. Actions alternatives include "Repair or replacement required," "Reinforcement (repair) recommended," or "Re-apply corrosion prevention coating and re-work trench bottom."

Olympic response to item #5

As we noted earlier, the measured strains induced on Olympic's 20" line at the Ebey Slough crossing are very low relative to both the elastic or yield strength and ultimate strength of the steel pipe. The strain is also cyclical with the tides and there is no evidence of permanent deformation of the levee that could cause a build up of strain in the entire levee system.

There are two terms which get used almost interchangeably which must be understood - *stress* and *strain*. *Stress* is a measure of the intensity of the forces acting on a unit area of a material. In English units it is measured in pounds per square inch or psi. All materials, including carbon steel, have an ultimate strength, an intensity of forces which exceeds intermolecular bond forces and the material breaks or ruptures. Steel is used for pipelines and many other structural members because it provides high, very uniform strength at relatively low costs.

Strain is a measure of the deformation of a material in response to forces trying to pull it apart, crush it, twist it, or blow it apart. Strain is usually measured in inches of change per inches of original length. We measure strain in micro-strain units, (millions or inches per inch of original length). At Ebey Slough we recorded strain as much as 30/1,000,000 inch per inch of length. The same level of strain would be induced by a five degree (F) temperature change in the pipeline to give some comparison. A more important comparison is that for our pipeline steel with an minimum tensile strength of 52,000 psi, the pipe can take 1700/1,000,000 inches per inch of strain without being permanently deformed or effected. Pipeline operations routinely induce hoop or circumferential strain of as high as 1200/1,000,000 inches per inch without permanently changing the inside diameter of the pipe.

Stress and strain in materials like steel have a relationship as graphed on the attached chart. As an increasing force acts on the material, the strain increases directly with the increase in stress or force acting. As long as the yield strength or tensile strength is not exceeded (for the OPL 20" line this is a minimum of 52,000psi), then as the force is relaxed, the steel returns to its original length and shape. This is the so called elastic range which our pipelines and most structural steel members are designed to operate in. The design codes for liquid pipelines limit us to using no more than 72 percent of this yield strength to provide adequate safety factors.

As the stresses exceed the yield strength of the pipe, the steel does not fail, but it does plastically deform. Plastic deformation is permanent so that when force is released and the stress is eliminated, the steel will not return to its original shape and size. If force is applied to the extent that the stresses go beyond the yield strength, the strain will increase in a non-direct relationship to stress until the ultimate stress is exceeded and the material fails or breaks. This plastic range of pipe strength is not considered in normal design of the a pipeline system but instead provides additional safety factor against failure.

It is important to note that once a pipe or structural member is plastically deformed that it retains its original ultimate strength and elastic strength. The formed steel bumper on a car or the pipe bent to follow the contour of the ground, while deformed, regains its elastic strength even though it is has been permanently elongated.

At any rate, the hydraulic forces acting on the levee and pipe cause extremely minor stresses which at the levels measured have no significance to the pipeline. It does produce measurable elastic strains but does not effect the safety of the pipeline in either the short term or long term (50 plus years).

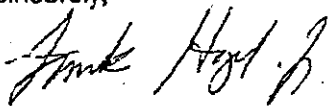
We do think that the hydraulic forces created when the levee broke ten years ago at the north side of our south Ebey Slough crossing, did cause strains in the plastic range. These have the potential to cause a problem in the future, which is why we plan to re-install this crossing with a new bored installation at the cost of over \$650,000.

Olympic response to item #7

The location methods used by Olympic Pipe Line Company personnel to accurately identify the pipeline at river and stream crossings are by the use of transmitter and receiver system and probe bar. The electronic transmitter system sends a signal to the pipe by either placing the device over the pipeline or connecting to wires at a test point station which is attached to the pipeline. The second device is a receiver that detects the location of the pipeline. The receiver has an indicator on a display that directs the user left or right. The result is the user end up directly over the pipeline. The most current model can give approximate depth of the pipeline. The electronic detection tool used is manufactured by MetroTech. The models are 810, 850 and 9860. Additionally the field technician can probe for the pipeline with a probe bar. The probe bar is always used when the pipeline is being excavated to confirm depth of burial.

We trust this satisfies your requirements. We will submit a final table showing the summary of anomaly investigation and disposition and soon as all work is complete, currently scheduled for August 1, 1997. If you and your staff would like to witness any of these activities, please advise Richard Klasen at (425) 235-7736.

Sincerely,



Frank Hopf, Jr.
Vice President/Manager

SUMMARY OF 1997 CALIPER PIG INSPECTION AND FIELD INVESTIGATION

Pipeline Segment Stationing	Defect/Discrepancy	Finding	Scheduled or actual investigation 1997	Repair/Replacement Required	Reinforcement Recommended (Full Encirclement Sleeve)	Recoat and Retrenching Recommended	Completion Date 1997
FERDALE	TO	ALLEN 16"					
16" 843+69	.45" Total Sharp**		May				
ANACORTES	TO	ALLEN 16"					
None	None						
RENTON	TO	SEATTLE 12"					
None	None						
RENTON	TO	SEA-TAC 12"					
None	None						
ALLEN	TO	RENTON 20"					
987+15	.70" Ttl, .49" Sharp		June				
1450+21	.59" Total Sharp**		June				
1724+53	.63" Ttl, .44" Sharp**		June				
3076+53	.70" Total Sharp		June				
ALLEN	TO	RENTON 16"					
783+45.5	1.12" Total Sharp	.75" Sharp	4/2	No	Yes	Yes	4/4
1783+64	1.02" Total Sharp	.625" Sharp	4/7	No	Yes	Yes	4/9
3549+50	.94" Ttl, .67" Sharp	Less than .50" Flat	4/3	No	No	Yes	4/5
3595+37	1.06" Ttl, .77" Sharp	Greater than .50" Sharp	4/7	No	Yes	Yes	4/16
1724+64	.59" Total Sharp	.75" Sharp	4/11	No	Yes	Yes	4/17
2141+66	.43" Total Sharp**		May				
2268+93	.63" Ttl, .50" Sharp	.375" Sharp	5/14	No	No	Yes	5/14
2278+98	.70" Ttl, .57" Sharp	.375" Sharp ***	5/12	No	***	***	***
2283+48	.54" Ttl, .37" Sharp	.56" Sharp	5/5	No	No	Yes	5/9
2319+41	.80" Total Sharp	.50" Sharp	5/15	No	No	Yes	5/15
2319+92	.74" Total Sharp	.375" Sharp	5/15	No	No	Yes	5/15
2340+35	.50" Ttl, .39" Sharp	.375" Sharp	5/1	No	No	Yes	5/15
2383+31	.78" Total Sharp	.344" Sharp	5/16	No	No	Yes	5/2
2416+49	.76" Total Sharp	.50" Sharp ****	5/20	Yes	Yes	Yes	5/19
2451+94	.84" Total Sharp	.562" Sharp ****	5/21	Yes	Yes	Yes	5/22
2587+82	.48" Total Sharp	.25" Sharp	4/28	No	No	Yes	5/22
3073+29	.84" Total Flat		May			Yes	4/29
3084+00	.50" Total Sharp**		June				

SUMMARY OF 1997 CALIPER PIG INSPECTION AND FIELD INVESTIGATION

Pipeline Segment Stationing	Defect/Discrepancy	Finding	Scheduled or actual investigation 1997	Repair/ Replacement Required	Reinforcement Recommended (Full Encirclement Sleeve)	Recoat and Retrenching Recommended	Complete Date 1997
3111+07	.80" Total Sharp		June				
3839+30	.69" TI, .37" Sharp**		June				
3992+23	.59" TI, .33" Flat**		June				
1956+51	1.06" TI, .65 Sharp		July				
2045+27	1.80" TI, 1.26" Sharp		July Bore Replacement				
2045+56	1.40" TI, .96" Sharp		July Bore Replacement				
2046+61	.94" TI, .35" Sharp		July Bore Replacement				

Definitions:

Total

Sharp

Flat

**

is a measurement made from the baseline of the record to the peak.

Anomaly as a reduction in pipe diameter, occurring within a span of 2 feet or less.

Anomaly as a reduction in pipe diameter having a span exceeding 2 feet but, not greater than 5 feet.

May Investigate if risk is justified by engineering opinion.

Also found localized corrosion near weld, while not technically requiring repair, this segment will be cut

out and replaced during the installation of the new bored crossing of Ebey Slough.











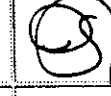
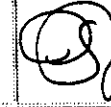



Small gouge found in pipe wall in the dent, requiring repair.

Bayview Terminal Check List

Performed By: JUSTICE DALABA, OIEN, Date: 1/7/99
WILLIAMSON, ROBERTS, WITTMER, KLASSEN,
HUFF, BERRY

Local (OMI indicated by >)	Initials OK	Maint Rpt	Remarks	Control Center Indication
1.0 > Power Failure	[Signature]			
2.0 > Emergency Power Disconnect	[Signature]			Emergency Power Drop
2.1 > Emergency Power Disconnect Local or Renton Command	[Signature]			
2.2 > Feeder Management Relay	[Signature]			Feeder Multilin Trip
a. Line undervoltage	[Signature]			
b. Line overvoltage	[Signature]			
c. Time overcurrent	[Signature]			
d. Instantaneous overcurrent	[Signature]			
2.3 > Unit Stop Failure	[Signature]			Unit Stop Failure
3.0 > Terminal Lockout	[Signature]			Terminal Lockout, FE Inc. S/D, AA Inc. S/D, FE Out. S/D, AA Out S/D, M.L. pumps S/D, Sump, Injection & Transfer pump S/D.
3.1 > Terminal Lockout (Control Panel or Pole Positions in yard)	[Signature]			Local L/O
3.2 > Hi-Hi Sump level	[Signature]			Hi-Hi Sump
3.3 > Hi-Hi Tank	[Signature]			Hi-Hi Tank (number)
3.4 > Fire Eyes	[Signature]			Fire Eyes Alarm
4.0 > Ferndale Incoming Shutdown	[Signature]			Ferndale Incoming Shutdown

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a. Ferndale Receiver Inlet or Ferndale Receiver Inlet Bypass				Closes
b. Ferndale Tightline Feed or Ferndale Inlet Manifold valve(s)				Closes
4.1 Terminal Lockout				
4.2 Ferndale Incoming Shutdown (Control Panel, Local OMI, Renton supervisory)				
4.3 > Ferndale Incoming Incomplete Sequence Tank Manifold				Inc. Seq. Ferndale Inlet Man.
4.4 > Ferndale Pump Feed Incomplete Sequence				Inc. Seq. Ferndale Incoming Man., Inc. Seq. Ferndale Outlet Man.
4.5 > High Loop Pressure				Hi Loop Press. Ferndale Inlet Man.
5.0 > Anacortes Incoming Shutdown				Anacortes Incoming Shutdown
a. Anacortes Receiver Inlet or Anacortes Receiver Inlet Bypass				Closes
b. Anacortes Tightline Feed or Anacortes Inlet Manifold valve(s)				Closes
5.1 Terminal Lockout				Anacortes Incoming Shutdown
5.2 Anacortes Incoming Shutdown (Control Panel, Local OMI, Renton supervisory)				Local L/O
5.3 > Anacortes Incoming Incomplete Sequence Tank Manifold				Inc. Seq. Anacortes Inlet Man.
5.4 > Anacortes Pump Feed Incomplete Sequence				Inc. Seq. Anacortes Incoming Man., Inc. Seq. Anacortes Outlet Man.
5.5 > High Loop Pressure				Hi Loop Press. Anacortes Inlet Man.

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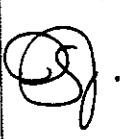


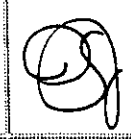

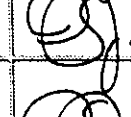
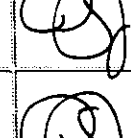

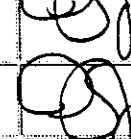
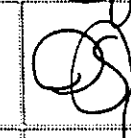

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6.0 > Ferndale Outgoing Shutdown				Ferndale Outgoing Shutdown
a. Ferndale M.L. unit (U1), (U2) if FE pump & Inj. pump to FE				Shutdown and inhibited from pumping
b. Ferndale Launcher Outlet or Ferndale launcher Outlet Bypass				Closes
c. Ferndale Normal Pump Feed and Ferndale Outlet Manifold valve(s)				Closes
6.1 Terminal Lockout				Ferndale Outgoing Shutdown
6.2 Ferndale Outgoing Shutdown (Control Panel, Local OMI, Renton supervisory)				Local L/O
6.3 > Ferndale Outgoing Incomplete Sequence Tank Manifold				Inc. Seq Ferndale Outgoing Man.
6.4 > Ferndale Pump Feed Incomplete Sequence				Inc. Seq. Ferndale Incoming Man., Inc. Seq. Ferndale Outlet Man.
7.0 > Anacortes Outgoing Shutdown				Anacortes Outgoing Shutdown
a. Anacortes M.L. unit (U3), (U2) if AA pump & Inj. pump to AA				Shutdown and inhibited from pumping
b. Anacortes Launcher Outlet or Anacortes Launcher Outlet Bypass				Closes
c. Anacortes Normal Pump Feed and Anacortes Outlet Manifold valve(s)				Closes
7.1 Terminal Lockout				Anacortes Outgoing Shutdown
7.2 Anacortes Outgoing Shutdown (Control Panel, Local OMI, Renton supervisory)				Local L/O

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7.3 > Anacortes Outgoing Incomplete Sequence Tank Manifold				Inc. Seq Anacortes Outgoing Man.
7.4 > Anacortes Pump Feed Incomplete Sequence				Inc. Seq. Anacortes Incoming Man., Inc. Seq. Anacortes Outlet Man.
8.0 Facility Reset				—
8.1 > Ferndale Incoming Reset				Ferndale Incoming Reset
a. FE Rec. Inlet or FE Rec. Bypass after FE TK Inlet Man. Valve is open or FE Tight Line Pump Feed is open				
b. FE Tight Line Pump Feed or FE TK Inlet Man. Valve is open				
8.2 > Anacortes Incoming Reset				Anacortes Incoming Reset
a. AA Rec. Inlet or AA Rec. Bypass after AA TK Inlet Man. Valve is open or AA Tight Line Pump Feed is open				
b. AA Tight Line Pump Feed or AA TK Inlet Man. Valve is open				
8.3 > Ferndale Outgoing Reset				Ferndale Outgoing Reset
a. Sump pump and M.L. unit released to operate for Ferndale				
b. FE Launcher. Outlet or FE Outlet Bypass released to open				
c. FE Normal Pump Feed and FE Outlet Man. valve is released to open				
8.4 > Anacortes Outgoing Reset				Anacortes Outgoing Reset
a. Sump pump and M.L. unit released to operate for Anacortes				

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b. AA Launcher. Outlet or FE Outlet Bypass released to open			
c. AA Normal Pump Feed and AA Outlet Man. valve is released to open			
9.0 > Unit #1 Lockout			Unit #1 Lockout, Unit #1 Shutdown
9.1 > Multilin Trip			Unit #1 Multilin Trip
9.2 > Unit #1 Motor Vibration			Unit #1 Vibration
9.3 > Unit #1 Pump Vibration			Unit #1 Vibration
9.4 > Unit #1 Seal Leak			Unit #1 Seal Leak
9.5 > Unit #1 Inc Seq.			Unit #1 Inc Seq
10.0 Unit #2 Lockout			Unit #2 Lockout, Unit #2 Shutdown
10.1 > Multilin Trip			Unit #2 Multilin Trip
10.2 > Unit #2 Motor Vibration			Unit #2 Vibration
10.3 > Unit #2 Pump Vibration			Unit #2 Vibration
10.4 > Unit #2 Seal Leak			Unit #2 Seal Leak
10.5 > Unit #2 Inc Seq.			Unit #2 Inc Seq
10.6 > Unit #2 Drain/Fill Inc Seq.			Unit #2 Drain/Fill Inc Seq
10.7 > Incomplete Seq.-Drain/Fill Pump Unit			Unit #2 Drain/Fill Inc. Seq.
11.0 > Unit #3 Lockout			Unit #3 Lockout, Unit #3 Shutdown
11.1 > Multilin Trip			Unit #3 Multilin Trip
11.2 > Unit #3 Motor Vibration			Unit #3 Vibration
11.3 > Unit #3 Pump Vibration			Unit #3 Vibration
11.4 > Unit #3 Seal Leak			Unit #3 Seal Leak

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11.5 > Unit #3 Inc Seq			Unit #3 Inc Seq
12.0 > Unit #1 Start			Unit #1 Start
13.0 > Unit #1 Shutdown			Unit #1 Shutdown
13.1 Shutdown from OMI, pole position			
13.2 > Low Unit #1 Suction Pressure			Unit #1 Low Suction
13.3 > Unit #1 No Flow			Unit #1 No Flow
13.4 > High Ferndale Control Pressure			Ferndale Hi Control
14.0 > Unit #2 Ferndale Start			Unit #2 Ferndale Start
15.0 > Unit #2 Anacortes Start			Unit #2 Anacortes Start
16.0 > Unit #2 Ferndale Shutdown			Unit #2 Ferndale Shutdown
16.1 Shutdown from OMI, pole position			
16.2 > Low Unit #2 Suction Pressure			Unit #2 Low Suction
16.3 > Unit #2 No Flow			Unit #2 No Flow
16.4 > High Ferndale Control Pressure			Ferndale Hi Control
17.0 > Unit #2 Anacortes Shutdown			Unit #2 Anacortes Shutdown
17.1 Shutdown from OMI, pole position			
17.2 > Low Unit #2 Suction Pressure			Unit #2 Low Suction
17.3 > Unit #2 No Flow			Unit #2 No Flow
17.4 > High Anacortes Control Pressure			Anacortes Hi Control
18.0 > Unit #3 Start			Unit #3 Start

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19.0 > Unit #3 Shutdown			Unit #3 Shutdown
19.1 Shutdown from OMI, pole position			
19.2 > Low Unit #1 Suction Pressure			Unit #1 Low Suction
19.3 > Unit #1 No Flow			Unit #1 No Flow
19.4 > High Ferndale Control Pressure			Ferndale Hi Control
20.0 > Drain/Fill Pump #2 Sequence			Drain / Fill
18.0 High Loop Pressure			—
a. Ferndale Inlet Man.			Hi Loop Press. FE Inlet Man. Ferndale Incoming Shutdown
b. Anacortes Inlet Man			Hi Loop Press. AA Inlet Man. Anacortes Incoming Shutdown
19.0 High Ferndale Control Pressure			Unit #1 Shutdown (if pumping) Unit #2 Shutdown (if pumping) Ferndale Hi Control
20.0 High Anacortes Control Pressure			Unit #3 Shutdown (if pumping) Unit #2 Shutdown (if pumping) Anacortes Hi Control
21.0 > High Level Tank (number)			Hi-Tank (number)
22.0 > T209 Tank Mixer Start			Tank Mixer Start
23.0 > T209 Tank Mixer Shutdown			Tank Mixer Shutdown
24.0 > T209 Tank Mixer Alarm			Tank Mixer Alarm
25.0 > Injection Pump Start			Injection Pump Start

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26.0 > Injection Pump Shutdown				Injection Pump Shutdown
26.1 From OMI or Pole Position				—
26.2 > Injection Pump High Pressure				Inj. Hi Press.
26.3 Injection Pump set point is pumped				—
26.4 > Low Level Transmix Tank				—
27.0 > High Level Sump				High Sump
28.0 > Sump Pump Start				Sump Pump Start
29.0 > Sump Pump Shutdown				Sump Pump Shutdown
29.1 Initiation from OMI or pole position				—
29.2 When sump liquid level drop to specified level.				—
29.3 > Sump Pump No Flow				Sump Pump No Flow
30.0 > Transfer Pump Start				Transfer Pump Start
31.0 > Transfer Pump Shutdown				Transfer Pump Shutdown
31.1 > Transfer Pump No Flow				Transfer Pump No Flow
32.0 Scraper Passage				Scraper In or Scraper Out
33.0 > High Pressure Surge Relief				High Pressure Surge Relief
34.0 > Fire Eyes Disarmed				Fire Eyes Disarmed
30.0 > Sampler Hi Pot				Sampler Alarm, Hi Pot
31.0 > Sampler Reset				Sampler Reset
31.0 > Sampler Start				Sampler Seq. Start
32.0 > Sampler Flush				
33.0 > Sampler Sampling				Sampler Sampling and % done

[Handwritten scribbles in the left column of the table]

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34.0 > Sampler Done	<i>SS</i>			Sampler Done
34.0 > Sampler Alarm	<i>SS</i>			Sampler Alarm

Revised February 10, 1999

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