Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - Records Review and Field Inspection

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Senior Engineer within 30 days from completion of the inspection.

Inspection Report			
Docket Number	Insp ID 2621		
Inspector Name & Submit Date	Dave Cullom 5/18/2012		
Chief Eng Name & Review Date	Joe Subsits, 5/22/2012		
Operator Information			
Name of Operator:	Cascade Natural Gas Corporation	**OP ID #:**	2128
Name of Unit(s):	Cascade Natural Gas - Transmission		
Records Location:	Bellingham, Mt Vernon, Bremerton		
Date(s) of Last (unit) Inspection:	N/A – New unit	**Inspection Date(s):**	April 10 – 13 and April 18, 2012

Inspection Summary:

The inspection included a random selection of records, operation and maintenance, emergency response, inventory and field inspection of the pipeline facilities. This was the first year for this type of inspection and it went relatively smoothly, but some records took some time to obtain from the operator due to the records storage locations. The operator's staff did the best they could to prepare for a new type of inspection and were prepared with most of the standard items that we are expected to be reviewed. The field portion consisted of a visit to the Kickerville pressure limiting station, the Fredonia compressor, several rectifiers and casings within the Mount Vernon District, and a visit to limiting facilities on Deegan Rd in Shelton and Belfair to verify the proper functioning of a rectifier that had been damaged by a ground fault. CNG Staff were OQ reviewed in all three districts. I was provided a MAOP sheet in which I reviewed the essential variables to compute MAOP and the records I reviewed were complete and reviewed by Kevin Raschkow. Additionally, I spot checked some historical records (Original welding certs, line pipe material specs for Fredonia) and the operator provided the records for review in a timely manner. Some of the noted NOPVs were part of a settlement agreement that is not due to be reevaluated for compliance until June 30, 2012 and they were shared with the operator.

The following is a list of all transmission systems operated by CNG in Washington State:

						Operating	**Op. Pr.**		**MAOP**
			.			**Pressure**	**SMYS**	**MAOP**	**SMYS**
District	**Description**	**Year *Installed***	**Pipe O.D (inches)**	**W.T. (inches)**	**Pipe Grade (psig)**	**(psig)**	**(%)**	**(psig)**	**(%)**
Aberdeen	8" Kitsap Peninsula	1963	8.625	0.188	46,000	500	24.94	500	24.94
Bellingham	8" Lake Terrell Rd.	1965	8.625	0.188	35,000	380	24.91	380	24.91
Bellingham	16" North Whatcom	1971	16.000	0.250	52,000	535	39.93	600	36.93
Bellingham	8" Kickerville	1971	8.625	0.188	52,000	535	23.61	600	26.47
Bellingham	12" Grandview	1980	12.750	0.250	42,000	535	32.49	600	36.43
Bellingham	4" West Lynden	1987	4.500	0.188	35,000	535	18.30	600	20.52
Bellingham	20" Ferndale	1993	20.000	0.375	52,000	535	27.44	600	30.77
Bellingham	20" Sumas	1993	20.000	0.375	52,000	600	30.77	780	40.00
Bellingham	8" South Kickerville	1971	8.625	0.188	52,000	380	16.76	380	16.76
Bremerton	8" Kitsap Peninsula	1963	8.625	0.188	46,000	500	24.94	500	24.94

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Inspection Summary:

Bremerton	8" Bremerton	1963	8.625	0.188	46,000	500	24.94	500	24.94	Aug-6
Mt. Vernon	8" Anacortes	1957	8.625	0.188	42,000	400	21.85	400	21.85	Sep-5
Mt. Vernon	8" March Point	1957	8.625	0.188	42,000	400	21.85	400	21.85	Dec-5
Mt. Vernon	16" Fredonia	1983	16.000	0.281	52,000	500	27.38	500	27.38	7/28/
Mt. Vernon	16" March Point	1992	16.000	0.281	52,000	500	27.38	500	27.38	5/7/1

HQ Address:	**System/Unit Name & Address:**
8113 W. Grandridge Blvd Kennewick, WA 99336	Bellingham District (Records Location) 910 Racine St. Bellingham, WA 98229 Bremerton District – 6313 Kitsap Way (Records Location) 6313 Kitsap Way Bremerton, Wa 98337

Co. Official: Tina Beach
Phone No.: 509.734.4576
Fax No.: 509.737.9803
Emergency Phone No.: 888.522.1130

Phone No.: 360.733.5981
Fax No.: 360.733.1416
Emergency Phone No.: 888.522.1130

Persons Interviewed	Title	Phone No.
Vicki Ganow	Pipeline Safety Specialist	360-788-2381
Patti Chartrey	Pipeline Safety Specialist	360-373-1405
Gordon Van Corbach	Engineer Associate III	360-303-2020
Chanda Marek, P.E.	Manager Western Region	360-405-4220
Kathy Bergner	District Manager – Bellingham	360-788-2345
Tom Wilson	District Manager	360-600-1922
Tina Beach	Regulatory Compliance Mgr.	(509) 734-4576 office & (206) 445-4121 cell

(check one below and enter appropriate date)

☐	Team inspection was performed (Within the past five years.) or,	**Date:**	
☒	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	**Date:**	11/2007

GAS SYSTEM OPERATIONS

Gas Supplier Williams and Spectra (Canada)

Number of reportable safety related conditions last year 0	Number of deferred leaks in system 0
Number of non-reportable safety related conditions last year 0	Number of third party hits last year 1 on Fredonia
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 143 total miles - It is not grouped into class location mileage	

Operating Pressure(s):	**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)

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GAS SYSTEM OPERATIONS			
Feeder:	The data is in the attached spreadsheet as updated 2/16/2012 by Kevin Raschkow as there are numerous subsystems	780 psig on 20” Sumas 600 psig on 8” Kickerville 500 psig on 8” Kitsap	Not field checked 512 psig 499 psig
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	1 in Mt Vernon District – Looked at in 2001 by SZ and checked the startup/shutdown procedures in this audit		

Pipe Specifications:			
Year Installed (Range)	1963 - 1993	Pipe Diameters (Range)	4” -20”
Material Type	Steel	Line Pipe Specification Used	API5L
Mileage	143	SMYS %	MAOP SMYS 16.76 -40%
Supply Company	Kaiser Steel (Fredonia System only confirmed from PO. Other systems will most likely have other suppliers)	Class Locations	Class 1 and 2

Integrity Management Field Validation

Important: Per PHMSA, IMP Field Verification Form 16 (Rev 3/19/2010) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at http://primis.phmsa.dot.gov/gasimp/home.gim **Date Completed:** Refer to Al Jones’s 2012 IMP Inspection for CNG

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

PART 192 Implement Applicable Control Room Management Procedures		S	U	NA	NC
.605(b)(12)	Implementing the applicable control room management procedures required by 192.631. (Amdt. 192- 112, 74 FR 63310, December 3, 2009, eff. 2/1/2010)**.**Notes – per Chandra they have been and were recently audited*****	X			

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b) ADB-08-07	**Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002** Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to http://www.npms.phmsa.dot.gov/submission/ to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates. *****Notes – Per Vicki sent in around March 21st*****	X			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders *****Notes – They sent Rey the transmission and the over 250 lines have been already sent per Rey via the operator*****	X			
3.	191.5	Immediate Notice of certain incidents to **NRC (800) 424-8802,** or electronically at http://www.nrc.uscg.mil/nrchp.html, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). ***** None – No federal reportables per Vicki I looked at the calculations for loss estimation*****	X			

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REPORTING RECORDS			S	U	N/A	N/C
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov unless an alternative reporting method is authorized IAW with paragraph (d) of this section. (Amdt. 191-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011).	X			
5.	191.15(a)	30-day follow-up written report (**Form 7100-2**) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). *****Notes – None *****			X	
6.	191.15(c)	Supplemental report (to 30-day follow-up) *****Notes – None *****			X	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(**NOTE**: June 15, 2011 for the year 2010).* (Amdt. 192-115, 75 FR 72878, November 26, 2010).	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011).	X			
9.	191.23	Safety related condition reports *****Notes – None *****			X	
10	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery *****Notes – None *****			X	
11	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports*****Notes – None *****			X	
12	480-93-200(1)	Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9146** (Within **2 hours**) for events which **(regardless of cause)**; *****Notes – None *****				
13	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization; *****Notes – None *****			X	
14	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; **Note:** Report all damages regardless if claim was filed with pipeline company or not. *****Notes – None *****			X	
15	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas; *****Notes – None *****			X	
16	480-93-200(1)(d)	Results in the unintentional ignition of gas; *****Notes – None *****			X	
17	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; *****Notes – None *****			X	
18	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; *****Notes – None *****			X	
19	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or *****Notes – Fredonia and I looked at the 30 day follow-up *****	X			
20	480-93-200(2)	Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9146** (Within **24 hours**) for; *****Notes – None *****			X	
21	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; *****Notes – None *****			X	
22	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; *****Notes – None *****			X	
23	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or *****Notes – None *****			X	
24	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP *****Notes – None *****			X	

Comments:

			S	U	N/A	N/C
25	480-93-200(5)	Written incident reports (within 30 days) including the following;				

26	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	X			
27	480-93-200(4)(b)	The extent of injuries and damage;	X			
28	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;	X			
29	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;	X			
30	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
31	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	X			
32	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
33	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
34	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			
35	480-93-200(4)(j)	Line type;	X			
36	480-93-200(4)(k)	City and county of incident; and	X			
37	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
38	480-93-200(5)	Submit a supplemental report if required information becomes available	X			
39	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any **incident or hazardous condition** due to **construction defects or material failure** *****Notes – None *****			X	

Comments:

40	480-93-200(7)	**Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year	S	U	N/A	N/C
41	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
42	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;	X			
43	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; *****Notes – 2010 38,267 and 2011 41,953 both systems****	X			
44	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and *****Notes – 2010 and 2011 – 0 damages*****	X			
45	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other	X			
46	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. *****Notes – 2010 1 on a transmission line Stephanie Z looked at the repair.*****	X			
47	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities *****Notes sent to Marina Jan 6****	X			

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48	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
49	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
50.	192.225	Test Results to Qualify Welding Procedures	X			
51.	192.227	Welder Qualification **Notes - Looked at Adam Sad's quals. The projects 178.132 * in East of Highway 9. Also looked at March Pt **	X			
52.	192.241(a)	Visual Weld Inspector Training/Experience **Notes – Welders are OQed for welding. I looked at Adam Sad's visual. I got a copy and he requalified in 2010**	X			
53.	192.243(b)(2)	Nondestructive Technician Qualification **Notes - NDT is performed by contractors. These are in each project's documentation**			X	
54.	192.243(c)	NDT procedures ***Notes – Looked at comp procedure CP 760.10***			X	
55.	192.243(f)	Total Number of Girth Welds ***Notes – None as required by .241***			X	
56.	192.243(f)	Number of Welds Inspected by NDT ***Notes – None as required by .241***			X	
57.	192.243(f)	Number of Welds Rejected ***Notes – None as required by .241***			X	
58.	192.243(f)	Disposition of each Weld Rejected ***Notes – None as required by .241***			X	
59.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables ***Notes Appendix C welders not used for transmission lines**			X	
60.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 **Notes - None w/o vents***			X	
61.	480-93-115(3)	Sealing ends of casings or conduits on Transmission lines and main ***Notes - Looked at CP design for link seals***	X			
62.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services ***Notes – This is a transmission system***			X	
63.	192.303	Construction Specifications	X			
64.	192.325	Underground Clearance	X			
65.	192.327	Amount, Location, Cover of each Size of Pipe Installed	X			
66.	192.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) does it meet the additional construction requirements for: • Quality assurance • Girth welds • Depth of cover • Initial strength testing, and; • Interference currents? ***Notes Alt MOAP is not used***			X	
67.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length ***Notes – Sedro Woolley 12 inch was not available or filed with the UTC. This was part of the settlement agreement that SZ initiated. - In Mt Vernon Docket per operator **		X		
68.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines ***Notes – Sedro Woolley 12 inch and recent Anacortes. Asked for pressure test for recent Anacortes and supporting calibration data***	X			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
69.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers Recom or Operators schedule) *****Notes –Looked at Aberdeen, Bham, Mt Vernon, and Bremerton. On 11/9/2010, the Bremerton district had some instrument calibrations indicated on the "District Instrument/Gauge Calibration Report" that did not have the gauge number listed. This made it impossible to determine if that specific gauge was calibrated within the required timeframe. *****		X		
70.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig *****Notes -No transmission moved or lowered. There was a reroute, but not an in service move*****			X	
71.	192.455	Cathodic Protection *****Notes – Looked at the Operations manual. Mt Vernon has the job records for the Anacortes line and we looked at the PSP reads from ACVG and the line was completed in October 17-27th *****	X			

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
72.	192.14	**Conversion To Service Performance and Records**				
73.	192.14 (a)(2)	Visual inspection of right of way, aboveground and selected underground segments*****Notes – No Conversion to Service*****			X	
74.	192.14 (a)(3)	Correction of unsafe defects and conditions *****Notes – No Conversion to Service*****			X	
75.	192.14 (a)(4)	Pipeline testing in accordance with Subpart J*****Notes – No Conversion to Service*****			X	
76.	192.14 (b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline)			X	
77.	192.16	Customer Notification (**Verification – 90 days – and Elements**) *****Notes –No customers directly off CNGs facilities*****			X	
78.	192.603(b)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) .605(a) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09 *****Notes – No sheet indicating revisions. CNG is integrated procedures with other MDU utilities. This was part of the settlement agreement that SZ initiated. *****		X		
79.	192.603(b)	Abnormal Operations .605(c) ****Notes – need more detail on AOC*** The operator will strengthen this in CP799 and CP 925*** ****This does not apply to a distribution operator that operates transmission lines See 162.605(c5)*******			X	
80.	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3) ******Notes – They use GIS and have hard copies******	X			
81.	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8) *****Notes - Construction Inspections are done by EA (Engineering Associates) and uses a construction checklist The compliance department performs field audits. Managers also review work. 1 review per CP 799-09 monthly*****	X			
82.	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4) ******Notes - Post analysis review for every incident, but no procedures for abnormal operation review. This is being addressed in Quality Assurance and Quality Control.**** ****This does not apply to a distribution operator that operates transmission lines See 162.605(c5)*******			X	
83.		**Damage Prevention Program**				
84.	192.603(b)	List of Current Excavators .614 (c)(1) *****Notes - The PAPA list was complete.*****	X			
85.	192.603(b)	Notification of Public/Excavators .614 (c)(2) *****Notes – This is also done through Paradigm*****	X			
86.	192.603(b)	Notifications of planned excavations. (One -Call Records) .614 (c)(3) *****Notes – They participate in One Call*****	X			
87.	.614(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				

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		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
88.		1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline? ******Notes – The operator has done so in the past, but no reason to believe this condition has occurred on their transmission lines.******	X			
89.		2. In the case of blasting, does the inspection include leakage surveys? (required) *****Notes – No blasting has occurred. ******			X	
90.	**Damage Prevention (Operator Internal Performance Measures)**					
91.	Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do Y N x ******Notes – a Member, but have not officially started using the application******					
92.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) *****Notes - CNG is currently looking at locating QA/QC as part of the settlement agreement *****			x	
93.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? ****Notes - In house****			X	
94.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? *****Notes - In house locating is performed*****			X	
95.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? *****Notes – Covered in safety meetings and checked*****	X			
96.		Review operator locating and excavation procedures for compliance with state law and regulations. *****Notes – In CP 835*****	X			
97.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
98.	195.507(b)	Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? *****Notes – OQed Energy World*****	X			
99.	192.709	Class Location Study (**If Applicable**) .609 *****Notes – The operator designs and operates to class 4 criteria*****	X			
100.	192.605(a)	Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08. .611 *****Notes – No pipelines over 40 % SMYS so .611 is not initiated from .609****			X	
101.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) **Note:** Review operator records of previous accidents and failures including third-party damage and leak response *****Notes - No leak calls. Looked at Fredonia repair*****	X			
102.	192.615	Actions required to be taken by a controller during an emergency in accordance with 192.631. (Amdt. 192-112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). .615(a)(11) *****Notes – Defer to Scott Rukke's CRM inspection.*****				X
103.	192.603(b)	Location Specific Emergency Plan .615(b)(1**) ***Notes they have emergency shutdown procedures for each district. I asked for the compressor location specific plan and the had a draft of the compressor station.*****	X			
104.	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2) *****Notes – They have a PAPA Pipeline Emergency Response Guideline coursework and there are 8 scenarios*****	X			
105.	192.603(b)	Employee Emergency activity review, determine if procedures were followed. .615(b)(3) *****Notes – They go through CP 925, and perform the post incident analysis as they did in Fredonia *****	X			
106.	192.603(b)	Liaison Program with Public Officials .615(c) *****Notes – through PAPA and at the district level*****	X			

Comments:

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		Public Awareness Program .616	**S**	**U**	**N/A**	**N/C**
	192.603(b)	Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.				
		API RP 1162 Baseline* Recommended Message Deliveries				

Stakeholder Audience (Natural Gas Transmission Line Operators)	**Baseline Message Frequency (starting from effective date of Plan)**
Residents Along Right-of-Way and Places of Congregation	2 years
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual
One-Call Centers	As required of One-Call Center

* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.

			S	U	N/A	N/C
107.	192.603(b)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .616(d) (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with the unintended release from a gas pipeline facility (3) Physical indications of a possible release; (4) Steps to be taken for public safety on the event of a gas pipeline release; and (5) Procedures to report such an event (to the operator). *****Notes – Public in 2009 and 2011, Emergency Officials Annual, Public Officials Annual, but 3yr completion cycle.*****	X			
108.		Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). .616 (e) & (f)	X			
109.						
110.		The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. .616(g) *****Notes - DIG reports provide demographics. They sent Spanish and English.*****	X			
111.		IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than **June 20, 2010**. .616(h) ******Notes - In 2010, it was done, in 2011 it was done, and it will be done in 2014 again. ******	X			
112.		Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 **Note:** Including excavation damage (PHMSA area of emphasis) *****Notes - In the Fredonia incident a full report was done to prevent the possibility of reoccurrence .*****	X			

Comments:

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<table>
<tr><td>113.</td><td>192.517</td><td>Pressure Testing ***Notes – I reviewed Similk and March Point***</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>114.</td><td>.553(b)</td><td>Uprating ****Notes – None ***</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>115.</td><td>192.709</td><td>Maximum Allowable Operating Pressure (MAOP)</td><td colspan="4" rowspan="3"></td></tr>
<tr><td>116.</td><td rowspan="3">.709</td><td>Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.</td></tr>
<tr><td>117.</td><td>MAOP cannot exceed the lowest of the following: .619</td></tr>
<tr><td>118.</td><td>Design pressure of the weakest element, .619(a)(1) Amdt, 192-103 pub. 06/09/06, eff. 07/10/06</td><td></td><td></td><td></td><td></td></tr>
<tr><td>119.</td><td rowspan="3">.709</td><td>The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in the second column, unless the segment was tested in according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. .619(a)(3) **Notes – Operator does not use Alt MAOP***
<table>
<tr><th>Pipeline segment</th><th>Pressure date</th><th>Test date</th></tr>
<tr><td>-Onshore gathering line that first became subject to this part (other than §192.612) after April 13, 2006.</td><td>March 15, 2006, or date line becomes subject to this part, whichever is later.</td><td>5 years preceding applicable date in second column.</td></tr>
<tr><td>Offshore gathering lines</td><td>July 1, 1976</td><td>July 1, 1971</td></tr>
<tr><td>All other pipelines</td><td>July 1, 1970</td><td>July 1, 1965</td></tr>
</table></td><td></td><td></td><td>X</td><td></td></tr>
<tr><td>120.</td><td>.619(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with §192.611. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. **Notes – Operator does not use Alt MAOP***</td><td></td><td></td><td>X</td><td></td></tr>
<tr><td>121.</td><td>.620 If the pipeline is designed to the alternative MAOP standard in 192.620 does it meet the additional design requirements for:
• General standards
• Fracture control
• Plate and seam quality
• Mill hydrostatic testing
• Coating
• Fittings and flanges
Compressor stations Final rule pub. 10/17/08, eff. 12/22/08 **Notes – Operator does not use Alt MAOP***</td><td></td><td></td><td>X</td><td></td></tr>
<tr><td>122.</td><td>480-93-015(1)</td><td>Odorization of Gas – Concentrations adequate</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>123.</td><td>480-93-015(2)</td><td>Monthly Odorant Sniff Testing ***Notes - Looked at several sample months***</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>124.</td><td>480-93-015(3)</td><td>Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements ****Notes – None ***</td><td></td><td></td><td>X</td><td></td></tr>
<tr><td>125.</td><td>480-93-015(4)</td><td>Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) ***Notes - Looked at the (1) unit in Bham****</td><td>X</td><td></td><td></td><td></td></tr>
</table>

126.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months) ***Notes – Done as part of quarterly patrol looked at Aberdeen for 2011. Looked at 2010 Bham.**	X			
127.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days? *** Notes - No issues looked at 2010 Bham and Aberdeen 2011 *****	X			

Comments:

128.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained *****Notes - None *****			X	
129.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained. ******Notes – CNGs policy is to not leave the scene or enter if anyone is under 18- No occurances**			X	
130.	480-93-187	Gas Leak records *****None – (For Transmission)*****			X	
131.	480-93-188(1)	Gas Leak surveys *****Notes - Bham Ferndale 20” spot checked*****	X			
132.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days)	X			
133.	480-93-188(3)	Leak survey frequency **(Refer to Table Below) Notes – Transmission is addresses in 141**			X	

Business Districts (By 6/02/07)	**1/yr (15 months)**
High Occupancy Structures	**1/yr (15 months)**
Pipelines Operating ≥ 250 psig	**1/yr (15 months)**
Other Mains: CI, WI, copper, unprotected steel	**2/yr (7.5 months)**

134.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs			X	
135.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred			X	
136.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected			X	
137.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions			X	
138.	480-93-188(5)	Gas Survey Records	X			
139.	480-93-188(6)	Leak Survey Program/Self Audits *****Notes – Dec 23, 2011 Previous assessment was Dec 31, 2008 and was much less detailed. This study measured all components.*****	X			
140.	192.709	Patrolling (**Refer to Table Below**) .705 ******Notes - see question 126******	X			

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	**2/yr (7½ months)**	**1/yr (15 months)**
3	**4/yr (4½ months)**	**2/yr (7½ months)**
4	**4/yr (4½ months)**	**4/yr (4½ months)**

141.	192.709	Leak Surveys (**Refer to Table Below**) .706	X			

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Class Location	**Required**	**Not Exceed**
1 and 2	**1/yr**	**15 months**
3	**2/yr**	**7½ months**
4	**4/yr**	**4½ months**

Looked at at 2011 20 inch Ferndale Leak Maps and they were done and AOCs were ID'ed

- 8 inch Kickerville 2011 #1 and #2 2012 #1

142.	192.605(b)	Abandoned Pipelines; Underwater Facility Reports .727(g) ******Notes – None *****			X	
143.	192.709	Compressor Station Relief Devices (**1 per yr/15 months**) .731(a) ******Notes - Looked at Fredonia relief calcs.******	X			
144.	192.709	Compressor Station Emergency Shutdown (**1 per yr/15 months**) .731(c) ****** Notes - Looked at Fredonia**	X			
145.	192.709	Compressor Stations – Detection and Alarms (**Performance Test**) .736(c) ****** Notes - Looked at Fredonia**	X			
146.	192.709	Pressure Limiting and Regulating Stations (**1 per yr/15 months**) .739 ***Notes –Looked at Bham 2011 and 2010 Bremerton 2011 Aberdeen 2011 from SharePoint Mt Vernon 2010 2011 ******Notes Checked Bay Valve Service Certified by the National Board certification to repair reliefs R-74 for 2010 had the lock-up on the stand-by at 489 psig. It was corrected The following year it was 389.*****	X			
147.	192.709	Pressure Limiting and Regulator Stations – Capacity (**1 per yr/15 months**) .743 *****Notes – these are done by engineering*****	X			

Comments:

148.	192.709	Valve Maintenance (**1 per yr/15 months**) .745 *****Notes – Look at Mt Vernon and Bham. To 2010 Aberdeen office is closed, but we looked at 2011. V-5 V-33 and V-32 Bremerton 2011 and 2010**	X			
149.	192.709	Vault Maintenance (**≥200 cubic feet**)(**1 per yr/15 months**) .749 *****Notes- None*****			X	
150.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 *****Notes – None*****			X	
151.	192.603(b)	Welding – Procedure .225(b)	X			
152.	192.603(b)	Welding – Welder Qualification .227/.229	X			
153.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) *****Notes – The pipelines are operated at less than 40% SMYS*****			X	
154.	192.709	NDT Records (**Pipeline Life**) .243(f) *****Notes – The pipelines are operated at less than 40% SMYS*****			X	
155.	192.709	Repair: pipe (**Pipeline Life**); Other than pipe (**5 years**) *****Notes – FYI records in Kennewick*****	X			
156.	.807(b)	Refer to PHMSA Form # 15 to document review of operator's employee covered task records	X			
157.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) ******Notes – This is done on an annual basis CNG uses "Re-evaluation of HCA form******	X			

Comments:

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
158.	192.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel *****Notes - Reviewed CP 755*****	X			
159.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)* *******Notes – Similk was provided as a representative example****	X			
160.	192.491	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**) .465(a) ****Notes – None***			X	
161.	192.491	Maps or Records .491(a) *****Notes – No complete maps, but records showing anode locations*****	X			
162.	192.491	Examination of Buried Pipe when Exposed .459	X			
163.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
164.	192.491	Rectifier Monitoring (**6 per yr/2½ months**) .465(b)	X			
165.	192.491	Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c) ******Notes – One for BP for Kickerville in Bham checked the 2mnth reads for 2011 and part of 2012******	X			
166.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c)*****Notes – Mt Vernon has 4****	X			
167.	192.491	Prompt Remedial Actions .465(d) *****Notes - No issues for the recordset looked at*****			X	
168.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/39 months**) .465(e) *****Notes – none per Vicki*****			X	
169.	192.491	Electrical Isolation (**Including Casings**) .467 ****** Notes – looked at 2011 and 2012 Bham and Bremerton 2011*** *** Notes -Follow-up leak survey missing essential variables but on distribution side for Belfair.*****	X			
170.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) *****Notes - No issues for the record-set looked at*****			X	
171.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched)				
172.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months ****Notes – checked as part of 169*****	X			
173.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods ******None in system******			X	
174.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days ******None in system******			X	
175.	480-93-110(5)(c)	Casing shorts cleared when practical *****Note - No shorted casings per Vicki*****			X	
176.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months			X	
177.	192.491	Interference Currents .473 *****Notes - CP 755.018 addresses this. BP critical bond. Intalco and Norton Corrosion monitors***.**	X			
178.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) *****Notes – No corrosive gas*****			X	
179.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) ******Notes – No issues per Tina. The IM plan looks at IC when the pipeline is cutout******			X	
180.	192.491	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems .476(d) ***Notes - CP 605 addresses this***	X			
181.	192.491	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) .477 *****Notes – None****			X	

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
182.	192.491	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481 **Notes – This is checked as part of the regulator station inspect and was noted (wrap, paint, .etc)	X			
183.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 ****Notes – This is addressed in CP 605***	X			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
184.	192.161	Supports and anchors	X			
185.	192.179	Valve Protection from Tampering or Damage	X			
186.	480-93-015(1)	Odorization levels	X			
187.	192.463	Levels of Cathodic Protection	X			
188.	192.465	Rectifiers	X			
189.	192.467	CP - Electrical Isolation	X			
190.	192.469	Test Stations (Sufficient Number)	X			
191.	192.476	Systems designed to reduce internal corrosion	X			
192.	192.479	Pipeline Components Exposed to the Atmosphere	X			
193.	192.481	Atmospheric Corrosion - monitoring	X			
194.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992)	X			
195.	192.605	Knowledge of Operating Personnel	X			
196.	613(b), .703	Pipeline condition, unsatisfactory conditions, hazards, etc.	X			
197.	480-93-124	Pipeline Markers, Road and Railroad Crossings	X			
198.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**)	X			
199.	192.739	Pressure Limiting and Regulating Devices (**Mechanical**) (spot-check field installed equipment vs. inspection records)	X			
200.	192.743	Pressure Limiting and Regulating Devices (**Capacities**) (spot-check field installed equipment vs. inspection records)	X			
201.	192.745	Valve Maintenance	X			
202.	192.751	Warning Signs Posted	X			
203.	192.801 - 192.809	Operator qualification questions – Refer to OQ Field Inspection Protocol Form	X			

Operator Qualification Field Validation

Important: Per PHMSA, the OQ Field Inspection Protocol Form 15 (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq **Date Form Upload Completed:**

Comments:

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Comments:

		S	U	N/A	N/C
	COMPRESSOR STATIONS INSPECTION (Note: Facilities may be "Grandfathered") If not located on a platform check here and skip 192.167(c)				
.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits	X			
	Door latch must open from inside without a key	X			
	Doors must swing outward	X			
(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit	X			
	Each gate located within 200 ft of any compressor plant building must open outward	X			
	When occupied, the door must be opened from the inside without a key	X			
(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?** *****Yes, per Greg Nelson*****	X			
.165(a)	If applicable, are there liquid separator(s) on the intake to the compressors?	X			
.165(b)	Do the liquid separators have a manual means of removing liquids?	X			
	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?	X			
.167(a)	ESD system must:				
	- Discharge blowdown gas to a safe location	X			
	- Block and blowdown the gas in the station	X			
	- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers	X			
	- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage	X			
	ESD system must be operable from at least two locations, each of which is:				
	- Outside the gas area of the station	X			
	- Not more than 500 feet from the limits of the station	X			
	- ESD switches near emergency exits?	X			
.167 (b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated? *****Notes – For transmission system and cogen plant N/A*****			X	
.167(c)	Are ESDs on platforms designed to actuate automatically by…				
	- For unattended compressor stations, when:				
	▪ The gas pressure equals MAOP plus 15%? ******Notes – Not on platform*****			X	
	▪ An uncontrolled fire occurs on the platform? **%?** ******Notes – Not on platform*****			X	
	- For compressor station in a building, when				
	▪ An uncontrolled fire occurs in the building?	X			
	▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to **NEC Class 1, Group D** is not a source of ignition)?	X			
.171(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.	X			
(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?	X			
(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?	X			
(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?	X			
(e)	Are the mufflers equipped with vents to vent any trapped gas?	X			

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COMPRESSOR STATIONS INSPECTION (Note: Facilities may be "Grandfathered") If not located on a platform check here and skip 192.167(c)		**S**	**U**	**N/A**	**N/C**
.173	Is each compressor station building adequately ventilated?	X			
.457	Is all buried piping cathodically protected?	X			
.481	Atmospheric corrosion of aboveground facilities	X			
.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? ******Notes - Looked at on-site proc******	X			
	Are facility maps current/up-to-date?	X			
.616	Public Awareness Program effectiveness - Visit identified stakeholders as part of field inspection routine	X			
.615	Emergency Plan for the station on site?	X			
.707	Markers	X			
.731	Overpressure protection – reliefs or shutdowns	X			
.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?	X			
	Are aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30? ***Notes – there are some above ground storage tanks, but not in comp building.*****	X			
.736	Gas detection – location ******Notes – there are several gas detection units****	X			

Comments:

Alternative Maximum Allowable Operating Pressure

For additional guidance refer to http://primis.phmsa.dot.gov/maop/faqs.htm
For Additional guidance see the FAQs at http://primis.phmsa.dot.gov/maop/faqs.htm

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192.620	**Alternative MAOP Procedures and Verifications**	**S**	**U**	**N/A**	**N/C**
	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with: Class Location — Alternative Design Factor (F) 1 — 0.80 2 — 0.67 3 — 0.56				
.620(a)	(1) Establish alternative MAOP commensurate with class location – no class 4			X	
	(2) MAOP cannot exceed the lowest of the following:				
	(i) Design pressure of the weakest element			X	
	(ii) Test pressure divided by applicable factor			X	
.620(b)	(2) Pipeline constructed of steel pipe meeting additional requirements in §192.112.			X	
	(3) SCADA system with remote monitoring and control			X	
	(4) Additional construction requirements described in §192.328			X	
	(5) No mechanical couplings			X	
	(6) No failures indicative of systemic material fault – if previously operated at lower MAOP			X	
	(7) 95% of girth welds have NDT			X	
.620(c)	(1) PHMSA notified 180 days before operating at alternative MAOP			X	
	(2) Senior Executive signatures and copy to PHMSA			X	
	(4) Strength test per §192.505 or certify previous strength test			X	
	(6) Construction tasks treated as covered tasks for Operator Qualification			X	
	(7) Records maintained for life of system			X	
	(8) Class location change anomaly remediations			X	
.620(d)	(1) Threat matrix developed consistent with §192.917			X	
	(2) Recalculate the potential impact circle per §192.903 and implement public education per §192.616			X	
	(3) Responding to an emergency in an HCA				
	(i) Identify HCAs using larger impact circle			X	
	(ii) Check personnel response times			X	
	(iii) Verify remote valve abilities			X	
	(iv) Verify line break valve control system			X	
	(4) Protect the right-of-way:				
	(i) ROW patrols 12 per year not to exceed 45 days			X	
	(ii) Plan to identify and mitigate unstable soil			X	
	(iii) Replace loss of cover if needed			X	
	(iv) Use line-of-sight markers per §192.707			X	
	(v) Review damage prevention program in light of national consensus practices			X	
	(vi) ROW management plan to protect against excavation activities			X	
	(5) Control Internal Corrosion:				
	(i) Program to monitor gas constituents			X	
	(ii) Filter separators if needed			X	
	(iii) Gas Monitoring equipment used			X	
	(iv) Cleaning pigs, inhibitors, and sample accumulated liquids				
.620(d)	(v) Limit CO2, H2S, and water in the gas stream			X	

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192.620	**Alternative MAOP Procedures and Verifications**	**S**	**U**	**N/A**	**N/C**
	(vi) Quarterly program review based on monitoring results			X	
	(6) (i) Control interference that can impact external corrosion			X	
	(ii) Survey to address interference currents and remedial actions			X	
	(7) Confirm external corrosion control through indirect assessment			X	
	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months				
	(ii) Remediate damage with IR drop > 35%			X	
	(iii) Integrate internal inspection results with indirect assessment			X	
	(iv) Periodic assessments for HCAs			X	
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results				
	(8) Cathodic Protection			X	
	(i) Complete remediations within 6 months of failed reading				
	(ii) Confirm restoration by a close interval survey			X	
	(iii) Cathodic protection system operational within 12 months of construction completion			X	
	(9) Baseline assessment of integrity			X	
	(i)(A) Geometry tool run within 6 months of service				
	(i)(B) High resolution MFL tool run within 3 years of service			X	
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X	
	(iii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X	
	(10) Periodic integrity assessments			X	
	(i) Frequency for assessments determined as if all segments covered by Subpart O				
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X	
	(11) Repairs			X	
	(i)(A) Use of the most conservative calculation for anomaly remaining strength				
	(B) Tool tolerances taken into consideration			X	
	(ii) Immediate repairs for:			X	
	(A) Dents meeting 309(b) criteria				
	(B) Defects meeting immediate criteria in §192.933(d)			X	
	(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X	
	(iii) Repairs within 1 year for:			X	
	(A) Defects meeting 1 year criteria in 933(d)				
	(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X	
	(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X	
	(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X	
	(1) Provide overpressure protection to a max of 104% MAOP			X	
.620(e)					
	(2) Procedure for establishing and maintaining set points for SCADA			X	

Comments:
Notes – Alt MAOP N/A – They do not use this method

Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

Number	**Date**	**Subject**
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical

		Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe
ADB-10-04	April 29, 2010	Pipeline Safety: Implementation of Electronic Filing for Recently Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-05	June 28, 2010	Pipeline Safety: Updating Facility Response Plans in Light of Deepwater Horizon Oil Spill
ADB-10-06	August 3, 2010	Pipeline Safety: Personal Electronic Device Related Distractions
ADB-10-07	August 31, 2010	Liquefied Natural Gas Facilities: Obtaining Approval of Alternative Vapor-Gas Dispersion Models
ADB-10-08	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

For more PHMSA Advisory Bulletins, go to http://phmsa.dot.gov/pipeline/regs/advisory-bulletin

Comments: