

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/Docket Number	5840		
Inspector Name & Submit Date	Lex Vinsel, 12/22/14		
Chief Eng Name & Review/Date	Joe Subsits, 12/22/2014		
Operator Information			
Name of Operator:	Cascade Natural Gas	OP ID #:	2128
Name of Unit(s):	Mt. Vernon District		
Records Location:	Mt. Vernon district office		
Date(s) of Last (unit) Inspection:	October 17-20, 24-27, 2011 and November 7, 2011	Inspection Date(s):	October 28-30, 2014

Inspection Summary:
Work on this copy for submittal to Mr. Subsits
Fence around Compressor is less than 200-feet and has no main gates. CNG procedure is to open both gates when the compressor is in operation.

HQ Address: Cascade Natural Gas Corporation 8113 W. Grandridge Blvd Kennewick WA 99336	System/Unit Name & Address: Cascade Natural Gas Corporation 1520 S. Second Street Mt Vernon WA 98273	
Co. Official: Eric Martuscelli Phone No.: (509) 572-0294 Fax No.: (509) 737-9803 Emergency Phone No.: 1-888-522-1130	Phone No.: (360) 336-6156 Fax No.: (360) 336-3476 Emergency Phone No.: 1-888-522-1130	
Persons Interviewed	Title	Phone No.
Vicki Ganow	Pipeline Safety Specialist	(360) 788-2381
Patti Chartrey	Pipeline Safety Specialist	(360) 405-4231
Tiffany Urland	District Manager	(360) 336-3887
Ted McCammant	District Operations Manager	(360) 336-3866

WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.			
(check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	2014

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<input checked="" type="checkbox"/>	OQ Program Review (PHMSA Form 14)	Date:	2014
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GAS SYSTEM OPERATIONS			
Gas Supplier	Williams Northwest Pipeline		
Services:	Residential 36663 Commercial 4468 Industrial 146 Other N/A		
Number of reportable safety related conditions last year	None	Number of deferred leaks in system	41
Number of <u>non-reportable</u> safety related conditions last year	None	Number of third party hits last year	21
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	20.6 (all class 3)	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)	805.6 (all class 4)
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Williams Northwest Pipeline		
Town:	O1 Sedro Woolley O2 Mount Vernon O3 Stanwood O4 Arlington O5 Arlington	500 400 500 250 150	
Other:	N/A	N/A	N/A
Does the operator have any transmission pipelines?	YES		
Compressor stations? Use Attachment 1.	YES		

Pipe Specifications:				
Year Installed (Range)	1957 to present		Pipe Diameters (Range)	½-inch to 16-inches
Material Type	Steel and PE		Line Pipe Specification Used	API, 5L, X42, X52, X46, 3408 PE, 2406 MDPE
Mileage	Transmission 20.6 Main 805.6 Service 555.1	SMYS %	8" Anacortes #1 34.41% Grade Verification in 2016 8" March Point #2 34.41% Grade Verification in 2015 16" Fredonia #14 Pipe 27.37% Fitting 40.67% Grade Verification in 2015 16" March Point #16 Pipe 27.37% Fitting 40.67% Grade Verification in 2015 6" Whidbey Island HP line #11 20.14% 45 feet at V-7	

Operator Qualification Field Validation
Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 4, May 2007) 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 Completed/Uploaded

Integrity Management Field Validation
Important: Per PHMSA, IMP Field Verification Form (Rev 6/18/2012) 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/Uploaded:

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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			

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. 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. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates.	CW			
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?	CW			
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. None in this district.			N/A	
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline at unless an alternative reporting method is authorized IAW with paragraph (d) of this section. None in this district.			N/A	
5.	191.15(a)	30-day follow-up written reports to PHMSA (Form F7100.2) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov None in this district.			N/A	
6.	191.15(c)	Supplemental report (to 30-day follow-up) None in this district.			N/A	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. <i>(NOTE: June 15, 2011 for the year 2010).</i>	CW			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline	CW			
9.	191.23	Filing the Safety Related Condition Report (SRCR) None in this district.			X	
10.	191.25 49 U.S.C. 60139, Subsection (b)(2)	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery. Note: Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA on or before the fifth day following the date on which the exceedance occurs. The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <ul style="list-style-type: none"> • The name and principal address of the operator date of the report, name, job title, and business telephone number of the person submitting the report. • The name, job title, and business telephone number of the person who determined the condition exists. • The date the condition was discovered and the date the condition was first determined to exist. • The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored. • The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action. None in this district. 			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions	CW			

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REPORTING RECORDS			S	U	N/A	N/C
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections No offshore pipelines in system.			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports None in this district.			X	
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which results in; CP 925				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None in this district.			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; None in this district.			X	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; CP 925 - 2 reviewed	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas; None in this district.			X	
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers CP 925 - 1 reviewed	X			
20.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; None in this district.			X	
21.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; CP 925 - 1 reviewed	X			
22.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; CP 925 - 9 reviewed	X			
24.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; None in this district.			X	
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or None in this district.			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP CP 925 - 3 reviewed	X			
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; CP 925	X			
29.	480-93-200(4)(b)	The extent of injuries and damage; CP 925	X			
30.	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; CP 925	X			
31.	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; CP 925	X			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; CP 925	X			
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; CP 925	X			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; CP 925	X			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; CP 925	X			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; CP 925	X			
37.	480-93-200(4)(j)	Line type; CP 925	X			
38.	480-93-200(4)(k)	City and county of incident; and CP 925	X			
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission. CP 925	X			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted None in this district.			X	
41.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure None in this district.			X	
42.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form)				
43.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) CP 835	X			

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REPORTING RECORDS			S	U	N/A	N/C
44.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed? CP 835	X			
45.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? Note: Records maintained for two years and made available to the commission upon request. CP 835	X			
46.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities? CP 835				
47.	480-93-200(8)(a)	<ul style="list-style-type: none"> • Notification requirements for excavators under RCW 19.122.050(1) CP 835 	X			
48.	480-93-200(8)(b)	<ul style="list-style-type: none"> • A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and CP 835 	X			
49.	480-93-200(8)(c)	<ul style="list-style-type: none"> • Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. CP 835 	X			
50.	480-93-200(9)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a) • A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) CP 835 	X			
51.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
52.	480-93-200(10)(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	CW			
53.	480-93-200(10)(b)	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.	CW			
54.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	CW			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	CW			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	CW			

Comments:

CW – Refers to items in the checklist that were company (CNGC) wide that were reviewed during previous 2014 Aberdeen District Inspection (Inspection ID #5841). End lev .

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
57.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator	X			
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
59.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate?	X			

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Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
60.	480-93-013	OQ records for personnel performing New Construction covered tasks Reviewed Stanwood 6 inch HP job 245435	X			
61.	192.225	Test Results to Qualify Welding Procedures	X			
62.	192.227	Welder Qualification	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months)	X			
64.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	X			
65.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	X			
66.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)	X			
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992	X			
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains	X			
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
70.	192.241(a)	Visual Weld Inspector Training/Experience	X			
71.	192.243(b)(2)	Nondestructive Technician Qualification	X			
72.	192.243(c)	NDT procedures	X			
73.	192.243(f)	Total Number of Girth Welds	X			
74.	192.243(f)	Number of Welds Inspected by NDT	X			
75.	192.243(f)	Number of Welds Rejected	X			
76.	192.243(f)	Disposition of each Weld Rejected	X			
77.	.273/.283	Qualified Joining Procedures Including Test Results	X			
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
80.	192.327	Amount, location, cover of each size of pipe installed	X			
81.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length None in district			X	
82.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: None in district			X	
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; None in district			X	
84.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. None in district			X	
85.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed None in district			X	
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; None in district			X	
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. None in district			X	
88.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; None in district			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
89.	480-93-160(2)(g)	Welding specifications; and None in district			X	
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. None in district			X	
91.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS? Notice for Fredonia HCA 171416-01	X			
92.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h)	X			
93.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? Reviewed	X			
94.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule)	X			
95.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig CP 622 Moving and Lowering of Steel gas mains	X			
96.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines \leq 60 psig Reviewed 5 leak surveys after lowering or moving pipeline.	X			

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
97.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline Reviewed Line 1 Pressure Test record, Reviewed hydrostatic test for Line 11.	X			
98.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years Reviewed 3 pressure test records for services.	X			
99.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09	CW			
100.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	CW			
101.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? Check for 6 months in Crew Sheets.	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures Construction Inspection Checklist is used to document the periodic review, monthly.	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures Note: This does not apply to CNGC BECAUSE THEY ARE NOT JUST Transmission.			CW	
104.	192.609	Class Location Study (If applicable) None required.			X	
105.	192.611	Confirmation or revision of MAOP None required.			X	
106.	192.614	Damage Prevention (Operator Internal Performance Measures)				
107.		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(10.0), Best Practice 4-18. Recommended only, not required) CNGC do their own locating of gas lines.			X	
108.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? CNGC do their own locating of gas lines.			X	
109.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? CNGC do their own locating of gas lines.			X	

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110.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? CNGC do their own locating of gas lines.	CW			
111.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	CW			
112.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Reviewed sample and locates are being done within 2 buisness days or better.	X			
113.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements?	CW			
114.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) CNG 625 – Form for follow up inspections. 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys?	X			

Comments:

CW – Refers to items in the checklist that were company (CNGC) wide that were reviewed during previous 2014 Aberdeen District Inspection (Inspection ID #5841). End lev .

115.	Emergency Response Plans		S	U	N/A	N/C
116.	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 Reviewed incidents during the year.	X			
117.	192.615(b)(1)	Location Specific Emergency Plan Reviewed Emergency Plan	X			
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training – Reviewed safety meetings minutes and Notifiable Incident Investigation form CNG 234.	X			
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed Reviewed safety meetings minutes and Notifiable Incident Investigation form CNG 234.	X			
120.	192.615(c)	Liaison Program with Public Officials CP 500 and reviewed list of contacts for Mt. Vernon District	X			
121.	192.616	Public Awareness Program				
122.	192.616(e&f)	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.). See table below: PA Inspection Followup at headquarters 10/21/14.	X			
123.		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.				
124.		API RP 1162 Baseline* Recommended Message Deliveries				

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125.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	Annual				
		LDC Customers	Twice annually				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	2 years				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		126.					
127.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. PA Inspection Followup at headquarters 10/21/14.		X			
128.	.616(h)	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) PA Inspection Followup at headquarters 10/21/14.		X			
129.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. No master meters in district.				X	
130.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10) Reviewed incidents during Safety Meeting (reviewed Items 118 and 119) meetings, no failure analysis required in district.		X			

Comments:

131.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08) Reviewed District Reg Spread Sheet – Mt. Vernon	X			
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate Reviewed odorant usage for 2012 & 2013 on five (5) odorizers.	X			

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133.	480-93-015(2)	Monthly Odorant Sniff Testing Reviewed readings for 6 months, random for 2012 & 2013.	X											
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements Reviewed readings for 6 months, random for 2012 & 2013.	X											
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Reviewed calibration twice per year for Odorant Testing Equipment.	X											
136.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) Reviewed during quarterly system patrols.	X											
137.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? Reviewed during quarterly system patrols.	X											
138.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on CP 684.025 system turn on, reviewed random sample of turn-on records.	X											
139.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None is district			X									
140.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? Reviewed gag leak records.	X											
141.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; Reviewed Leak Order Audit only one during time period.	X											
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? Reviewed Leak Order Audit only one during time period.	X											
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? Reviewed sample of leak evaluations 2013 & 2012.	X											
144.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? Reviewed sample of leak evaluations 2013 & 2012.	X											
145.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) Reviewed sample of leak evaluations 2013 & 2012.	X											
146.	480-93-188(1)	Gas leak surveys Reviewed equipment calibrations for 2011, 2012, 2013, OK	X											
147.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) Reviewed equipment calibrations for 2011, 2012, 2013, OK	X											
148.	480-93-188(3)	Leak survey frequency (Refer to Table Below) CP 715.04	X											
<table border="1" style="margin: auto;"> <tr> <td style="padding: 5px;">Business Districts (implement by 6/02/07)</td> <td style="padding: 5px;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">High Occupancy Structures</td> <td style="padding: 5px;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">Pipelines Operating \geq 250 psig</td> <td style="padding: 5px;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">Other Mains: CI, WI, copper, unprotected steel</td> <td style="padding: 5px;">2/yr (7.5 months)</td> </tr> </table>							Business Districts (implement by 6/02/07)	1/yr (15 months)	High Occupancy Structures	1/yr (15 months)	Pipelines Operating \geq 250 psig	1/yr (15 months)	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)
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149.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs CP 716 for special leak surveys.Reviewed work orders.	X											
150.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred None in this district			X									
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected	X											
152.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions None in this district			X									
153.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. Reviewed surveys from 2012 to 2013	X											
154.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f) Reviewed surveys for 2011 – 2012 - 2013	X											
155.	480-93-188(6)	Leak program - Self Audits Report reviewed.	X											
156.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 CP 716 Reviewed 2013 and 2014 Patrols.	X											

**Utilities and Transportation Commission
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157.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 CP 715 Reviewed 2013 and 2014 surveys.			X															
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158.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1) CP 716 reviewed patrols for 2012, 2013, & 2014			X															
159.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) CP 716 Reviewed patrols for 2012, 2013, & 2014			X															
160.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) CP 715 reviewed Random Sample of districts.			X															
161.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> Outside Business District (5 years) Cathodically unprotected distribution lines (3 years) CP 715 reviewed Random Sample of districts. 			X															
162.	192.603(b)	Tests for Reinstating Service Lines 192.725 CP 665.032			X															
163.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 None in this district					X													
164.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 Reviewed sample			X															
165.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 Reviewed spreadsheet previous 2014 audit.			CW															
166.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 Reviewed valve maintenance sample.			X															
167.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 Reviewed valve maintenance sample.			X															
168.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) Reviewed valve maintenance sample.			X															
169.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 None in district.					X													
170.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 None in district.					X													
171.	192.603(b)	Welding – Procedure 192.225(b) CP 760 – Reviewed during James St Relocate			X															
172.	192.603(b)	Welding – Welder Qualification 192.227/.229 CP 760 – Reviewed during James St Relocate			X															
173.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) None, all NDT is done by third party.					X													
174.	192.709	NDT Records (pipeline life) .243(f) CP 760 reviewed project files.			X															
175.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) CP 766			X															
176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) CP 716 Review during leak survey.			CW															

Comments:

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CW – Refers to items in the checklist that were company (CNGC) wide that were reviewed during previous 2014 Aberdeen District Inspection (Inspection ID #5841). End lev .

CORROSION CONTROL RECORDS			S	U	N/A	N/C
177.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) CP 755	X			
178.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) CP 755	X			
179.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) CP 755	X			
180.	192.491	Test Lead Maintenance .471 CP 755	X			
181.	192.491	Maps or Records .491(a) CP 755 Reviewed CP maps on computer.	X			
182.	192.491	Examination of Buried Pipe when exposed .459 Integrity Dig Reports CNG 625	X			
183.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed Integrity Dig Reports CNG 625	X			
184.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) Reviewed sample	X			
185.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Reviewed Bi-monthly reports	X			
186.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) None in district.			X	
187.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) On annual CP survey.	X			
188.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) Reviewed Low CP Read Investigation Reports for 2013	X			
189.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation. Reviewed calibration records for 2012-2014.	X			
190.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) None in district			X	
191.	192.491	Electrical Isolation (Including Casings) .467 Reviewed records.	X			
192.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months Reviewed annual leads.	X			
193.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods CNG uses Tinker Razor for casings without test leads.	X			
194.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days Reviewed sample of records.	X			
195.	480-93-110(5)(c)	Casing shorts cleared when practical None in reviewed sample.	X			
196.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months None in reviewed sample.	X			
197.	192.491	Interference Currents .473 CP 755	X			
198.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) CP 600 Reviewed during annual pipe to soil review.	X			
199.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) CP 755 Reviewed sample of CNG 625	X			
200.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 None in district.			X	
201.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Reviewed Atmosphic Corrosion control records.	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Reviewed sample of CNG 625	X			

Comments:

AOC – Valve – Able to turn off relief valve by turning off valve to control piolet.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
203.	192.161	Supports and anchors	X			
204.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? James St project	X			
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables James St project	X			
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? None observed			X	
207.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. Observed in field	X			
208.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified? James St project	X			
209.	480-93-015(1)	Odorization None observed				X
210.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel? Observed map and drawings available.	X			
211.	192.179	Valve Protection from Tampering or Damage	X			
212.	192.455	Pipeline coatings meet requirements of 192.461 (<i>for buried pipelines installed after 7/31/71</i>)	X			
213.	192.463	Levels of cathodic protection	X			
214.	192.465	Rectifiers	X			
215.	192.467	CP - Electrical Isolation	X			
216.	192.476	Systems designed to reduce internal corrosion No internal corrosion – dry gas			X	
217.	192.479	Pipeline Components exposed to the atmosphere	X			
218.	192.481	Atmospheric Corrosion: monitoring	X			
219.	192.491	Test Stations – Sufficient Number .469	X			
220.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
221.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
222.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? None observed.			X	
223.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
224.	192.605	Knowledge of Operating Personnel	X			
225.	480-93-124	Pipeline markers	X			
226.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? None in district.			X	
227.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) None in district.			X	
228.	192.195	Overpressure protection designed and installed where required?	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
229.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			
230.	192.741	Telemetering, Recording Gauges None observed	X			
231.	192.751	Warning Signs	X			
232.	192.355	Customer meters and regulators. Protection from damage	X			
233.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	X			
234.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
235.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) Markings on PE date of manufacture more than 2 years from inspection date. CNGC is tracking where they may have used this material.		X		
236.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	X			
237.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
238.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No X				
239.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? No PE installations above ground.			X	
240.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? No PE installations above ground.			X	
241.	192.745	Valve Maintenance (Transmission)	X			
242.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
Regulator Station	R-83	CNGC Mt. Vernon District
Regulator Station	R-146	CNGC Mt. Vernon District
Regulator Station	R-116	CNGC Mt. Vernon District
Rectifier	#9	CNGC Mt. Vernon District
Rectifier	#10	CNGC Mt. Vernon District
Pipe casing	GB18	CNGC Mt. Vernon District

Comments:

Item 235 – P6500 Gas PE2406/2708 ½-inch CTS Manufacture Date 09/14/2012 found on trailers in CNGC Mt. Vernon yard. PE pipe was beyond 2 years allowed for outside storage. Only Snelson Crews use the trailers, and they found that some of the expired material had been installed after expiration date.

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

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB-12-05	Mar 23, 12	Cast Iron Pipe (Supplementary Advisory Bulletin)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes

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

Attachment 1

Distribution Operator Compressor Station Inspection

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243. .605(b)		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
244.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service	X			
245.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units	X			
246.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement	X			
247.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings	X			
248.		(b) Tank must be protected according to NFPA #30	X			
249.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: Compressor has fixed gas detection and alarm.			X	
250.		• 50% of the upright side areas are permanently open, or Compressor has fixed gas detection and alarm.			X	
251.		• It is an unattended field compressor station of 1000 hp or less Compressor has fixed gas detection and alarm.			X	

Comments:

COMPRESSOR STATION O&M PERFORMANCE AND RECORDS			S	U	N/A	N/C
252.	.709	.731(a) Compressor Station Relief Devices (1 per yr/15 months)	X			
253.		.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)	X			
254.		.736(c) Compressor Stations – Detection and Alarms (Performance Test)	X			

Comments:

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
255.	.163	(c) Main operating floor must have (at least) two (2) separate and unobstructed exits	X			
256.		Door latch must open from inside without a key	X			
257.		Doors must swing outward	X			
258.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit see Note 258 below	X			
259.		Each gate located within 200 ft of any compressor plant building must open outward	X			
260.		When occupied, the door must be opened from the inside without a key	X			
261.		(e) Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?	X			
262.	.165	(a) If applicable, are there liquid separator(s) on the intake to the compressors? No liquid separators.			X	

Attachment 1

Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
263.	(b)	Do the liquid separators have a manual means of removing liquids? No liquid separators.			X	
264.		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? No liquid separators.			X	
265.	.167 (a)	ESD system must:				
266.		- Discharge blowdown gas to a safe location	X			
267.		- Block and blow down the gas in the station	X			
268.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers	X			
269.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage	X			
270.		ESD system must be operable from at least two locations, each of which is:				
271.	.167	- Outside the gas area of the station	X			
272.		- Not more than 500 feet from the limits of the station	X			
273.		- ESD switches near emergency exits?	X			
274.	(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?	X			
275.	(c)	Are ESDs on platforms designed to actuate automatically by...				
276.		- For unattended compressor stations, when:				
277.		▪ The gas pressure equals MAOP plus 15%? Compressor is attended during operation.			X	
278.		▪ An uncontrolled fire occurs on the platform? Compressor is attended during operation			X	
279.		- For compressor station in a building, when				
280.		▪ An uncontrolled fire occurs in the building?	X			
281.		▪ 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			
282.	.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			
283.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?	X			
284.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?	X			
285.	(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			
286.	(e)	Are the mufflers equipped with vents to vent any trapped gas?	X			
287.	.173	Is each compressor station building adequately ventilated?	X			
288.	.457	Is all buried piping cathodically protected?	X			
289.	.481	Atmospheric corrosion of aboveground facilities	X			
290.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?	X			
291.		Are facility maps current/up-to-date?	X			
292.	.615	Emergency Plan for the station on site?	X			
293.	.619	Review pressure recording charts and/or SCADA Reviewed operations log	X			
294.	.707	Markers	X			
295.	.731	Overpressure protection – relief’s or shutdowns	X			

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
296.	.735	Are combustibile materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?	X			
297.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?	X			
298.	.736	Gas detection – location	X			

Comments:

Note 258 – Fence less than 200 yards from compressor does not have mangates for emergency exit. CNGC practice is to unlock all gates when the compressor is in operation.