

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 | 6198 | | |
| Inspector Name & Submit Date | Dave Cullom – 10/13/2015 | | |
| Chief Eng Name & Review/Date | Joe Subsits – 10/23/2015 | | |
| Operator Information | | | |
| Name of Operator: | Akzo Nobel Pulp and Performance Chemicals, Inc. | OP ID #: | 32358 |
| Name of Unit(s): | Akzo Nobel Pulp and Performance Chemicals, Inc. | | |
| Records Location: | 2701 Road N NE Moses Lake, WA 98837 | | |
| Date(s) of Last (unit) Inspection: | 10/15/12 -10/16/12 | Inspection Date(s): | 9/15/2015 – 9/16/2015 |

Inspection Summary:

This inspection consisted of a review of Akzo Nobel’s pipeline facilities Operator Qualification (OQ) program and Public Awareness (PA) program. Staff reviewed design documents and pump curves to ensure the system is operating within its MAOP as part of the record verification process.

It is an 8-inch PE system which operates at 15 psig. The gas transported is Hydrogen. Compressors are incapable of exceeding this pressure. The line is about 2700 ft in length. Most of the system is in Akzo Nobel’s and Simplot’s property. The operator was assisted by Bob Cosentino.

Investigation Findings:

1. WAC 480-93-188 Gas leak surveys

- (3) *Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*
 - (e) *Unodorized gas pipelines - at least monthly.*

Finding(s):

The hydrogen pipeline is unodorized. The required leak survey frequency is at least monthly. Leak surveys were performed in February and January 2015 with expired operator qualifications. In March, April, May, June, and July of 2015 there was no documentation that leak surveys were performed. Previously in 2013 and 2014, the leak surveys were all complete and the operator performing the covered task had current qualifications.

2. WAC 480-93-180 Plans and procedures.

- (1) *Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

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Inspection Summary:

Finding(s):

There were two leak surveys being performed by an employee that exceeded the 3 year requalification interval. These surveys were performed in January and February 2015 with qualifications that were not current. The operator did not follow their procedure to ensure that there was no lapse in qualifications. The re-evaluation interval is three years per the operator qualification manual in section 5.12.

| | | | |
|---|--|---|----------------|
| HQ Address: 1775 West Oak Commons Court Marietta, GA 30062 | | System/Unit Name & Address: Akzo Nobel Pulp and Performance Chemicals, Inc. 2701 Road "N" NE Moses Lake, WA | |
| Co. Official: | Jimmy Jordan, Corporate HSE Manager | Phone No.: | (509) 765-6400 |
| Phone No.: | 662-240-8613 Office | Fax No.: | (509) 765-5557 |
| Fax No.: | 662-240-8657 Fax | Emergency Phone No.: | (509) 764-1500 |
| Emergency Phone No.: | None provided | | |
| Persons Interviewed | Title | Phone No. | |
| Robert Cosentino | President & CEO, Cosentino Consulting Inc. | 360-200-4959 | |
| Lind Bingham | Manager HSE and Logistics | 509-764-1502 | |
| | | | |
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| | | | |
|--|---|--------------|------------------|
| 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 type="checkbox"/> | Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.) A manual review was conducted in Q1 2015. Copy of review results are attached. | Date: | January 26, 2015 |
| <input checked="" type="checkbox"/> | OQ Program Review (PHMSA Form 14) ***Notes – We conducted a full OQ program audit during this inspection*** | Date: | 9/15/2015 |

| | |
|---|---|
| GAS SYSTEM OPERATIONS | |
| Gas Supplier | Self (Hydrogen) is created as a by-product of Akzo's manufacturing process. |
| Services: | |
| <i>Residential</i> 0 <i>Commercial</i> 0 <i>Industrial</i> 1 <i>Other</i> 0 | |
| Number of reportable safety related conditions last year 0 | Number of deferred leaks in system 0 |
| Number of <u>non-reportable</u> safety related conditions last year 0 | Number of third party hits last year 0 |

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| GAS SYSTEM OPERATIONS | | | |
|---|--|--|--|
| Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 0.5 Total, 0.0 in class 3&4 | | Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) 0.0 | |
| Operating Pressure(s): | | MAOP (Within last year) | Actual Operating Pressure (At time of Inspection) |
| Feeder: | None | None | None |
| Town: | None | None | None |
| Other: | 15 psig | 15 | 14.5 (per PIC-4202) |
| Does the operator have any transmission pipelines? | This is the only pipeline and it currently classified as distribution, but behaves more like a transmission line | | |
| Compressor stations? Use Attachment 1. | No | | |

| Pipe Specifications: | | | |
|------------------------|-------------|------------------------------|--|
| Year Installed (Range) | 1995 | Pipe Diameters (Range) | Single size, 8 inch |
| Material Type | HDPE PE3408 | Line Pipe Specification Used | ASTM D2513 Resin type PE3408 |
| Mileage | 0.5 | SMYS % | 26.4% calculated per Al Jones and Bob, but %SMYS cannot be used for plastic pipe calculations. |

| 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 Will upload after Chief Engineer reviews inspection documents. |

| 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: Not a part of DIMP. |

| 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 NPMS: 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. ***Notes - Done and in Pipeline File. Email sent 2/2015.*** | 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 - See appendix B of manual*** | X | | | |

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| REPORTING RECORDS | | | S | U | N/A | N/C |
|--------------------------|---|---|----------|----------|------------|------------|
| 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. ***Notes – Procedure located In Section 9.1.3 | | | X | |
| 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 ***Notes - Procedure located In Section 9.1.3 | | | X | |
| 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 ***Notes - Procedure located In Section 9.1.4 | | | X | |
| 6. | 191.15(c) | Supplemental report (to 30-day follow-up) ***Notes – Procedure located In Section 9.1.4 | | | 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. (<i>NOTE: June 15, 2011 for the year 2010</i>). ***Notes - Procedure located In Section 9.1.1 ****Verified submission**** | X | | | |
| 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 ***Notes - Procedure located In Section 9.1.5 | X | | | |
| 9. | 191.23 | Filing the Safety Related Condition Report (SRCR) ***Notes - Procedure located In Section 9.1.2 | | | 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. ***Notes - Procedure located In Section 9.1.2 and form F-25 and procedure P-5 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. | | | X | |
| 11. | .605(d) | Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions ***Notes – This is in Procedure P-5 | X | | | |
| 12. | 191.27 | Offshore pipeline condition reports – filed within 60 days after the inspections ***Notes - None*** | | | X | |
| 13. | 192.727(g) | Abandoned facilities offshore, onshore crossing commercially navigable waterways reports ***Notes - None*** | | | 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; ***Notes - Procedure located In Section 9.2.2.a | | | | |
| 15. | 480-93-200(1)(a) | A fatality or personal injury requiring hospitalization; ***Notes - Procedure located In Section 9.2.1.a.I | | | X | |
| 16. | 480-93-200(1)(b) | Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; ***Notes - Procedure located In Section 9.2.1.a.II | | | X | |

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|-------------------|------------------|--|---|---|-----|-----|
| 17. | 480-93-200(1)(c) | The evacuation of a building, or high occupancy structures or areas; ***Notes - Procedure located In Section 9.2.1.a.III | | | X | |
| 18. | 480-93-200(1)(d) | The unintentional ignition of gas; ***Notes - Procedure located In Section 9.2.1.a.IV | | | X | |
| 19. | 480-93-200(1)(e) | The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; ***Notes -Not distribution***** | | | 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; ***Notes - Procedure located In Section 9.2.1.a.V | | | 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; ***Notes - Procedure located In Section 9.2.1.a.VI | | | X | |
| 22. | 480-93-200(2) | Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for; ***Notes - Procedure located In Section 9.2.2 | | | | |
| 23. | 480-93-200(2)(a) | The uncontrolled release of gas for more than two hours; ***Notes - Procedure located In Section 9.2.2.a.i | | | 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; ***Notes - Procedure located In Section 9.2.2.a.ii | | | 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 ***Notes - Procedure located In Section 9.2.2.a.iii | | | X | |
| 26. | 480-93-200(2)(d) | A gas pipeline pressure exceeding the MAOP ***Notes - Procedure located In Section 9.2.2.a.iv | | | X | |
| 27. | 480-93-200(4) | Did written incident reports (within 30 days of telephonic notice) include the following ***Notes - Procedure located In Section 9.2.1.b | | | | |
| 28. | 480-93-200(4)(a) | Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; ***Notes - Procedure located In Section 9.2.1.b.i | | | X | |
| 29. | 480-93-200(4)(b) | The extent of injuries and damage; ***Notes - Procedure located In Section 9.2.1.b.ii | | | 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; ***Notes - Procedure located In Section 9.2.1.b.iii | | | 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; ***Notes - Procedure located In Section 9.2.1.b.iv | | | X | |
| 32. | 480-93-200(4)(e) | The date and time the gas pipeline company was first notified of the incident; 9.2.1.b.iv | | | X | |
| 33. | 480-93-200(4)(f) | The date and time the ((operators')) gas pipeline company's first responders arrived on-site; ***Notes - Procedure located In Section 9.2.1.b.v | | | X | |
| 34. | 480-93-200(4)(g) | The date and time the gas ((facility)) pipeline was made safe; ***Notes - Procedure located In Section 9.2.1.b.vi | | | X | |
| 35. | 480-93-200(4)(h) | The date, time, and type of any temporary or permanent repair that was made; ***Notes - Procedure located In Section 9.2.1.b.vii | | | X | |
| 36. | 480-93-200(4)(i) | The cost of the incident to the ((operator)) gas pipeline company; ***Notes - Procedure located In Section 9.2.1.b.viii | | | X | |
| 37. | 480-93-200(4)(j) | Line type; ***Notes - Procedure located In Section 9.2.1.b.ix | | | X | |
| 38. | 480-93-200(4)(k) | City and county of incident; and ***Notes - Procedure located In Section 9.2.1.b.x | | | X | |
| 39. | 480-93-200(4)(l) | Any other information deemed necessary by the commission. ***Notes - Procedure located In Section 9.2.1.b.xi | | | X | |
| 40. | 480-93-200(5) | Supplemental report if required information becomes available after 30 day report submitted ***Notes - Procedure located In Section 9.2.1.d | | | 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 ***Notes - Procedure located In Section 9.2.3 | | | 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) ***Notes - AKZO is a member of DIRT and would report if a damage or near miss were to occur. | | | | |

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|-------------------|-------------------|---|---|---|-----|-----|
| 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) ***Notes - AKZO is a member of DIRT and would report if a damage or near miss were to occur.*** | | | X | |
| 44. | 480-93-200(7)(b) | 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? ***Notes- AKZO is a member of DIRT and would report if a damage or near miss were to occur.*** | | | 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. Yes, this is required to be filed as facility form F-31 ***Notes – The operator has had no damages*** | | | X | |
| 46. | 480-93-200(8) | Does the operator provide the following information to excavators who damage gas pipeline facilities? Yes, if a damage should ever occur | | | | |
| 47. | 480-93-200(8)(a) | <ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) | | | 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 | | | 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. | | | 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) ***Notes - AKZO is a member of DIRT and would report if a damage or near miss were to occur.*** | | | X | |
| 51. | 480-93-200(10) | Annual Reports filed with the commission no later than March 15 for the proceeding calendar year ***Notes - Procedure located In Section 9.2.4 | | | | |
| 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 ***Notes – Submission requirement procedure located In Section 9.2.4.a.i*** | X | | | |
| 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. ***Notes – Procedure located in 9.2.4.a.iii, but none has occurred*** | | | X | |
| 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 ***Notes - Procedure located In Section 9.2.5.a | X | | | |
| 55. | 480-93-200(12) | Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. ***Notes – The procedure is located In Section 9.2.6, but no construction has occurred*** | | | X | |
| 56. | 480-93-200(13) | Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required ***Notes – Procedure located In Section 9.2.7 | X | | | |

Comments:

14-50 *Notes - No incidents or damage has occurred.*****

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| 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 ***Notes -Section 11.5.3 - N/A – No customers*** | | | X | |
| 58. | 192.381 | Does the excess flow valve meet the performance standards prescribed under §192.381? ***Notes – No EFVs*** | | | 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? ***Notes – No EFVs*** | | | X | |

Comments:

| CONSTRUCTION RECORDS | | | S | U | N/A | N/C |
|-----------------------------|---------------------------------|--|----------|----------|------------|------------|
| 60. | 480-93-013 | OQ records for personnel performing New Construction covered tasks | | | 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 ***Notes – Procedure located In Section D | | | X | |
| 79. | 192.325 WAC 480-93-178(4)(5) | Underground Clearances ***Notes – Procedure located In Section 11.2.7 | | | X | |
| 80. | 192.327 | Amount, location, cover of each size of pipe installed ***Notes - Procedure located In Section 11.2.7 & Appendix B | | | X | |
| 81. | 480-93-160(1) | Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length ***Notes – Procedure located in Section 9.2.1.6 | | | 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: ***Notes – Procedure located In Section 9.2.1.6 | | | X | |
| 83. | 480-93-160(2)(a) | Description and purpose of the proposed pipeline; | | | X | |

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| 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. | | | 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 | | | X | |
| 86. | 480-93-160(2)(d) | MAOP for the gas pipeline being constructed; | | | X | |
| 87. | 480-93-160(2)(e) | Location and construction details of all river crossings or other unusual construction requirements encountered en route. | | | 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; | | | X | |
| 89. | 480-93-160(2)(g) | Welding specifications; and | | | X | |
| 90. | 480-93-160(2)(h) | Bending procedures to be followed if needed. | | | 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? | | | 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? | | | 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 | | | X | |
| 96. | 480-93-175(4) | Leak survey within 30 days of moving or lowering pipelines \leq 60 psig | | | X | |

Comments:

Notes 60-96 – No new construction or repairs since the last inspection

| 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 ***Notes – Not above 100 psig*** | | | X | |
| 98. | 192.517(b) | Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years Appendix D *****Notes – There is a letter indicating a pressure test in pipeline database***** | 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 Page 3 of the manual ***Notes – Dated 12/15/14 by CCI*** | X | | | |
| 100. | 192.605(b)(3) | Availability of construction records, maps, operating history to operating personnel ***Notes - Procedure located In Section 3.2.1*** | X | | | |
| 101. | 480-93-018(3) | Records, including maps and drawings updated within 6 months of completion of construction activity? ***Notes – Procedure located In Section 1.11.1.e | X | | | |
| 102. | 192.605(b)(8) | Periodic review of personnel work – effectiveness of normal O&M procedures ***Notes - Procedure located In Section 1.10 ***Notes – Every year in December CCI performs a review of documentation for personnel*** | X | | | |
| 103. | 192.605(c)(4) | Periodic review of personnel work – effectiveness of abnormal operation procedures ***Notes – Procedure Located In Section 8.4.3 ***Notes – There has been no abnormal operations*** | | | X | |
| 104. | 192.609 | Class Location Study (If applicable) section 3.5 | | | X | |

**Utilities and Transportation Commission
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| OPERATIONS and MAINTENANCE RECORDS | | | S | U | N/A | N/C |
|------------------------------------|---------|--|---|---|-----|-----|
| 105. | 192.611 | Confirmation or revision of MAOP section 2.4 & Appendix D ***Notes – There is a procedure in place if the system were to become an HCA*** | 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, Best Practice 4-18. Recommended only, not required) ***Notes - N/A Permanently marked | X | | | |
| 108. | | Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? ***Notes - N/A Permanently marked | 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? ***Notes - N/A Permanently marked | X | | | |
| 110. | | Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? N/A Permanently marked | X | | | |
| 111. | | Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. ***Notes – Procedure located In Section 5, Procedure P-1 | X | | | |
| 112. | | Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ***Notes - N/A Permanently marked | 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? OQ Records ***Notes - Done once 5 years ago*** | X | | | |
| 114. | | Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 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? ***Notes There has not been reason to believe the pipeline had been damage. The procedure is in section 5.7*** | | | X | |

Comments:

| 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 ***Notes - I checked AKZO Prepared emergency response plan No accidents or emergencies*** | | | X | |
| 117. | 192.615(b)(1) | Location Specific Emergency Plan ***Notes - I checked AKZO Prepared emergency response plan*** | X | | | |
| 118. | 192.615(b)(2) | Emergency Procedure training, verify effectiveness of training ***Notes - I checked AKZO Prepared emergency response plan*** | X | | | |
| 119. | 192.615(b)(3) | Employee Emergency activity review, determine if procedures were followed. ***Notes - I checked AKZO Prepared emergency response plan. There has not been any events*** | | | X | |
| 120. | 192.615(c) | Liaison Program with Public Officials ***Notes - I checked AKZO Prepared emergency response plan*** | X | | | |
| 121. | 192.616 | Public Awareness Program | | | | |

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| 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: All data is in the facility PA Plan which is available for inspection ****Notes – Checked during the PA full audit conducted during the same visit**** | | | | 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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 125. | | <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Stakeholder Audience (LDC’s)</th> <th style="text-align: center;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residence Along Local Distribution System</td> <td>Annual</td> </tr> <tr> <td>LDC Customers</td> <td>Twice annually</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> <tr> <th style="text-align: center;">Stakeholder Audience (Transmission line operators)</th> <th style="text-align: center;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> <tr> <td>Residence Along Local Distribution System</td> <td>2 years</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> </tbody> </table> | 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 | | | | |
| 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. | | * Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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. ****Notes – Checked during the PA full audit conducted during the same visit**** | | | | 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. <u>For operators in existence on June 20, 2005</u> , 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 – Checked during the PA full audit conducted during the same visit**** | | | | 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. ****Notes – Akzo Nobel is not a MM operator**** | | | 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) ****Notes - None have occurred**** | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | |

Comments:

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| | | | | | | |
|-------------|------------------|---|---|---|---|--|
| 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) ***Notes - See Appendix D for MAOP determination. I reviewed MAOP determination for a plastic pipe system*** | X | | | |
| 132. | 480-93-015(1) | Odorization of Gas – Concentrations adequate ***Notes – N/A not possible to odorize Reference RITA documents*** | | | X | |
| 133. | 480-93-015(2) | Monthly Odorant Sniff Testing ***Notes – N/A not possible to odorize Reference RITA documents*** | | | X | |
| 134. | 480-93-015(3) | Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements ***Notes – N/A not possible to odorize Reference RITA documents*** | | | X | |
| 135. | 480-93-015(4) | Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) ***Notes – N/A not possible to odorize Reference RITA documents*** | | | X | |
| 136. | 480-93-124(3) | Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) ***Notes - N/A No bridges*** | | | X | |
| 137. | 480-93-124(4) | Markers reported missing or damaged replaced within 45 days? ***Notes – Procedures located in Section 5.5.7*** | X | | | |
| 138. | 480-93-140(2) | Service regulators and associated safety devices tested during initial turn-on ***Notes - N/A no regulators*** | | | X | |
| 139. | 480-93-155(1) | Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? ***Notes - N/A not possible to uprate this system*** | | | X | |
| 140. | 480-93-185(1) | Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? ***Notes - In Section 3.7*** | | | 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; ***Notes - N/A no other sources of Hydrogen*** | | | X | |
| 142. | 480-93-185(3)(b) | Leaks originating from a foreign source reported promptly/notification by mail. Records retained? ***Notes - N/A no other sources of Hydrogen*** | | | X | |
| 143. | 480-93-186(3) | Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? ***Notes - N/A no other sources of Hydrogen*** | | | X | |
| 144. | 480-93-186(4) | Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? ***Notes – Procedure located In Section 3.7 | | | X | |
| 145. | 480-93-187 | Gas leak records: at a minimum include required information listed under 480-93-187(1-13) ***Notes – No leaks *** | | | X | |
| 146. | 480-93-188(1) | Gas leak surveys ***Notes – Procedure located In Section 3.8, form F-14 | X | | | |
| 147. | 480-93-188(2) | Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) ***Notes – Procedure located In Section 3.8.4. They also function check the equipment before each survey*** | X | | | |
| 148. | 480-93-188(3) | Leak survey frequency (Refer to Table Below) ***Notes – It is unodorized so the required leak survey frequency is much higher – at least monthly. Leak surveys were performed in February and January 2015 with no current qualifications. March, April, May, June, and July had no documentation that leak surveys were performed. 2013 and 2014 leak surveys were all complete and the operator had current qualifications.*** | | X | | |

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| | | Business Districts (implement by 6/02/07) | | | | | | | | | | | | | | | | |
|---|-----------------------------------|---|-------------------|--|--|---|----------------|-----------------------------------|---------------------|----------------|-------------------------|-------------------------|----------|-------------------------|-------------------------|----------|-------------------------|-------------------------|
| | | 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) | | | | | | | | | | | | | | | |
| 149. | 480-93-188(4)(a) | Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs ***Notes – Procedure located In Section 3.8.2 | | | | 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 ***Notes – Procedure located In Section 3.8.2 | | | | X | | | | | | | | | | | | |
| 151. | 480-93-188(4)(c) | Special leak surveys - Unstable soil areas where active gas lines could be affected ***Notes – Procedure located In Section 3.8.2 | | | | X | | | | | | | | | | | | |
| 152. | 480-93-188(4)(d) | Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions ***Notes – Procedure located In Section 3.8.2 | | | | 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. ***Notes – Procedure located In Section 3.8.2 | | | | 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) ***Notes – Procedure located In Section 1.11.3.c | X | | | | | | | | | | | | | | | |
| 155. | 480-93-188(6) | Leak program - Self Audits How?? ****Notes - Done while scanning records by CCI*** | X | | | | | | | | | | | | | | | |
| 156. | 192.709 | Patrolling (Transmission Lines) (Refer to Table Below) .705 ***Notes – Procedure located In Section 3.6 and Checked 6/14/12, 6/28/13, 11/13/14, | X | | | | | | | | | | | | | | | |
| <table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table> | | | | | | | 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) |
| 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) | | | | | | | | | | | | | | | | |
| 157. | 192.709 | Leak Surveys (Transmission Lines) (Refer to Table Below) .706 ***Notes – This issue was addressed in question #148 as a NOPV*** | | | | X | | | | | | | | | | | | |
| <table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table> | | | | | | | Class Location | Required | Not Exceed | 1 | 1/yr | 15 months | 3 | 2/yr | 7½ months | 4 | 4/yr | 4½ months |
| Class Location | Required | Not Exceed | | | | | | | | | | | | | | | | |
| 1 | 1/yr | 15 months | | | | | | | | | | | | | | | | |
| 3 | 2/yr | 7½ months | | | | | | | | | | | | | | | | |
| 4 | 4/yr | 4½ months | | | | | | | | | | | | | | | | |
| 158. | 192.603(b) | Patrolling Business District (4 per yr/4½ months) .721(b)(1) ****Notes - Not distribution*** | | | | X | | | | | | | | | | | | |
| 159. | 192.603(b) | Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) ****Notes - Not distribution*** | | | | X | | | | | | | | | | | | |
| 160. | 192.603(b) | Leakage Survey - Outside Business District (5 years) 192.723(b)(1) ****Notes - Not distribution*** | | | | 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)****Notes - Not distribution*** | | | | X | | | | | | | | | | | | |
| 162. | 192.603(b) | Tests for Reinstating Service Lines 192.725 ****Notes - Not distribution*** | | | | X | | | | | | | | | | | | |
| 163. | 192.603(b)/.727(g) | Abandoned Pipelines; Underwater Facility Reports 192.727 N/A, ****Notes – No conditions – inland pipeline system**** | | | | X | | | | | | | | | | | | |
| 164. | 192.709 | Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 ***Notes – None – See pump curves in historical file*** | | | | X | | | | | | | | | | | | |
| 165. | 192.709 | Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 ***Notes – None – See pump curves in historical file*** | | | | X | | | | | | | | | | | | |

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| | | | | | | |
|------|---------------|--|---|--|---|--|
| 166. | 192.709 | Valve Maintenance – Transmission (1 per yr/15 months) .745 ***Notes - Located In Section 3.9 | X | | | |
| 167. | 192.709 | Valve Maintenance – Distribution (1 per yr/15 months) .747 ***Notes - Not distribution*** | | | X | |
| 168. | 480-93-100(3) | Service valve maintenance (1 per yr/15 months) ***Notes - Not distribution*** | | | X | |
| 169. | 192.709 | Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 ***Notes - Not vaults*** | | | X | |
| 170. | 192. 603(b) | Prevention of Accidental Ignition (hot work permits) .751 ***Notes - Located In Section 6.1, but no instances of hot work*** | | | X | |
| 171. | 192. 603(b) | Welding – Procedure 192.225(b) ***Notes – PE system*** | | | X | |
| 172. | 192. 603(b) | Welding – Welder Qualification 192.227/.229 ***Notes – PE system*** | | | X | |
| 173. | 192. 603(b) | NDT – NDT Personnel Qualification .243(b)(2) ***Notes – PE system*** | | | X | |
| 174. | 192.709 | NDT Records (pipeline life) .243(f) N/A, ***Notes – PE system*** | | | X | |
| 175. | 192.709 | Repair: pipe (pipeline life); Other than pipe (5 years) ***Notes - Located In Section 1.11.3 | | | X | |
| 176. | 192.905(c) | Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) ***Notes - Located In Section 3.6 & Procedure P-9 *****Notes - The operator is performing this as part of their monthly patrols***** | X | | | |

Comments:

| 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) | | | X | |
| 178. | 192.455(a)(2) | CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) | | | 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) | | | X | |
| 180. | 192.491 | Test Lead Maintenance .471 | | | X | |
| 181. | 192.491 | Maps or Records .491(a) | | | X | |
| 182. | 192.491 | Examination of Buried Pipe when exposed .459 | | | X | |
| 183. | 480-93-110(8) | CP test reading on all exposed facilities where coating has been removed | | | X | |
| 184. | 192.491 | Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) | | | X | |
| 185. | 192.491 | Rectifier Monitoring (6 per yr/2½ months) .465(b) | | | X | |
| 186. | 192.491 | Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) | | | X | |
| 187. | 192.491 | Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) | | | X | |
| 188. | 480-93-110(2) | Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) | | | 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. | | | X | |
| 190. | 192.491 | Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) | | | X | |
| 191. | 192.491 | Electrical Isolation (Including Casings) .467 | | | X | |
| 192. | 480-93-110(5) | Casings inspected/tested annually not to exceed fifteen months | | | X | |

Utilities and Transportation Commission
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| CORROSION CONTROL RECORDS | | | S | U | N/A | N/C |
|----------------------------------|------------------|--|----------|----------|------------|------------|
| 193. | 480-93-110(5)(a) | Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods | | | X | |
| 194. | 480-93-110(5)(b) | Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days | | | X | |
| 195. | 480-93-110(5)(c) | Casing shorts cleared when practical | | | X | |
| 196. | 480-93-110(5)(d) | Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months | | | X | |
| 197. | 192.491 | Interference Currents .473 | | | X | |
| 198. | 192.491 | Internal Corrosion; Corrosive Gas Investigation .475(a) | | | X | |
| 199. | 192.491 | Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) | | | X | |
| 200. | 192.491 | Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 | | | X | |
| 201. | 192.491 | Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 | | | X | |
| 202. | 192.491 | Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/485 | | | X | |

Comments:
*****Notes – 177 -202 This is a PE pipeline system*******

| PIPELINE INSPECTION (Field) | | | S | U | N/A | N/C |
|------------------------------------|------------------|---|----------|----------|------------|------------|
| 203. | 192.161 | Supports and anchors ***Notes – None*** | | | X | |
| 204. | 480-93-080(1)(d) | Welding procedures located on site where welding is performed? ***Notes – PE system*** | | | X | |
| 205. | 480-93-080(1)(b) | Use of testing equipment to record and document essential variables ***Notes – None has occurred since system construction*** | | | X | |
| 206. | 480-93-080(2)(a) | Plastic procedures located on site where welding is performed? ***Notes – None has occurred since system construction*** | | | 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. ***Notes -Section 11.5.3, None has occurred since system construction*** | | | X | |
| 208. | 480-93-013 | Personnel performing “New Construction” covered tasks OQ qualified? ***Notes – None has occurred since system construction*** | | | X | |
| 209. | 480-93-015(1) | Odorization ***Notes – None Hydrogen cannot be odorized per a RITA document that CCI referenced and past inspections noted that the odorant would affect the boiler’s operation*** | | | X | |
| 210. | 480-93-018(3) | Updated records, inc maps and drawings made available to appropriate operations personnel? | X | | | |
| 211. | 192.179 | Valve Protection from Tampering or Damage ***Notes – All inside the plant locations*** | X | | | |
| 212. | 192.455 | Pipeline coatings meet requirements of 192.461 (<i>for buried pipelines installed after 7/31/71</i>) ***Notes – None PE system*** | | | X | |
| 213. | 192.463 | Levels of cathodic protection ***Notes – None*** | | | X | |
| 214. | 192.465 | Rectifiers ***Notes – None*** | | | X | |
| 215. | 192.467 | CP - Electrical Isolation ***Notes – None*** | | | X | |
| 216. | 192.476 | Systems designed to reduce internal corrosion ***Notes – None*** | | | X | |
| 217. | 192.479 | Pipeline Components exposed to the atmosphere ***Notes – None*** | | | X | |
| 218. | 192.481 | Atmospheric Corrosion: monitoring ***Notes – None*****Notes – None*** | | | X | |

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| PIPELINE INSPECTION (Field) | | | S | U | N/A | N/C |
|-----------------------------|------------------|---|---|---|-----|-----|
| 219. | 192.491 | Test Stations – Sufficient Number .469 ***Notes – PE system**** | | | X | |
| 220. | 480-93-115(2) | Casings – Test Leads (casings w/o vents installed after 9/05/1992) ***Notes – None required - PE installation No shorts possible. Casings are vented*** | 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? ***Notes – None*** | | | 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? Section 5.5.7 | X | | | |
| 227. | 192.719 | Pre-pressure Tested Pipe (Markings and Inventory) ***Notes – None*** | | | X | |
| 228. | 192.195 | Overpressure protection designed and installed where required? ***Notes – None*** | | | X | |
| 229. | 192.739/743 | Pressure Limiting and Regulating Devices (Mechanical/Capacities)***Notes – None*** | | | X | |
| 230. | 192.741 | Telemetry, Recording Gauges Control room ****Notes – No RTUs, chart boxes, but pressures and valves are monitored by the control room**** | X | | | |
| 231. | 192.751 | Warning Signs | X | | | |
| 232. | 192.355 | Customer meters and regulators. Protection from damage ***Notes – None*** | | | X | |
| 233. | 192.355(c) | Pits and vaults: Able to support vehicular traffic where anticipated. ***Notes – None*** | | | X | |
| 234. | 480-93-140 | Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? ***Notes – None*** | | | X | |
| 235. | 480-93-178(2) | Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) ***Notes – None*** | | | 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 | X | | | |
| 239. | 480-93-178(6)(a) | If yes, is facility monitored and protected from potential damage? ***Notes - No installations*** | | | X | |
| 240. | 480-93-178(6)(b) | If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?***Notes - No installations*** | | | X | |
| 241. | 192.745 | Valve Maintenance (Transmission) | X | | | |
| 242. | 192.747 | Valve Maintenance (Distribution) ***Notes – This line is reported as a transmission line*** | | | X | |

Facility Sites Visited:

| Facility Type | Facility ID Number | Location |
|--------------------------------|--------------------|----------|
| See field data collection form | | |
| | | |
| | | |

Comments:

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Comments:

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

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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| | | COMPRESSOR STATION PROCEDURES | S | U | N/A | N/C |
|------|---------|--|----------|----------|------------|------------|
| 243. | .605(b) | | | | | |
| 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: | | | X | |
| 250. | | • 50% of the upright side areas are permanently open, or | | | X | |
| 251. | | • It is an unattended field compressor station of 1000 hp or less | | | X | |

Comments:

Notes - #243 – 251 No Compressor Stations

| | | 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:

Notes - #252 – 254 No Compressor Stations

| | | 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 | | | 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? | | | X | |
| 263. | (b) | Do the liquid separators have a manual means of removing liquids? | | | 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? | | | 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”) | | | | | | |
| 265. | .167 | (a) | ESD system must: | | | |
| 266. | | | | | X | |
| 267. | | | | | X | |
| 268. | | | | | X | |
| 269. | | | | | X | |
| 270. | | | ESD system must be operable from at least two locations, each of which is: | | | |
| 271. | .167 | | | | X | |
| 272. | | | | | X | |
| 273. | | | | | 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? | | | |
| 275. | | (c) | Are ESDs on platforms designed to actuate automatically by... | | | |
| 276. | | | - For unattended compressor stations, when: | | | |
| 277. | | | | | X | |
| 278. | | | | | X | |
| 279. | | | - For compressor station in a building, when | | | |
| 280. | | | | | X | |
| 281. | | | | | 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. | | | |
| 283. | | (b) | Do the compressor station prime movers (other than electrical movers) have over-speed shutdown? | | | |
| 284. | | (c) | Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)? | | | |
| 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? | | | |
| 286. | | (e) | Are the mufflers equipped with vents to vent any trapped gas? | | | |
| 287. | .173 | | | | X | |
| 288. | .457 | | | | X | |
| 289. | .481 | | | | X | |
| 290. | .603 | | | | X | |
| 291. | | | | | X | |
| 292. | .615 | | | | X | |
| 293. | .619 | | | | X | |
| 294. | .707 | | | | X | |
| 295. | .731 | | | | X | |
| 296. | .735 | | | | X | |
| 297. | | | | | X | |
| 298. | .736 | | | | X | |

Comments:

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Distribution Operator Compressor Station Inspection

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Comments:

Notes - #265 – 298 No Compressor Stations