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	6211		
Inspector Name & Submit Date	Scott Rukke and Scott Anderson (field portion only) March 6, 2015		
Chief Eng Name & Review/Date	Joe Subsits, March 10, 2015		
Operator Information			
Name of Operator:	Cascade Natural Gas Co.	**OP ID #:**	2128
Name of Unit(s):	Bremerton District Office		
Records Location:	6313 Kitsap Way, Bremerton WA 98312		
Date(s) of Last (unit) Inspection:	July 24-27, 2012	**Inspection Date(s):**	February 24 – 25 and March 5 , 2015

Inspection Summary:

This inspection included a review of 2013 and 2014-15 operations and maintenance records. All leak records were reviewed. Employee qualification for fusion and welding were reviewed.
Random field facilities were chosen to inspect the second week and included two district regulator stations, two rectifiers, two cathodic protection test sites and an odorizer sniff point on the system end point.

HQ Address:	**System/Unit Name & Address:**
Cascade Natural Gas Co. 8113 W. Grandridge Blvd Kennewick WA 99336	Bremerton District Office 6313 Kitsap Way Bremerton WA 98312
Co. Official: Eric Martuscelli **Phone No.:** 509-572-0294 **Fax No.:** 509-737-9803 **Emergency Phone No.:** 1-888-522-1130	**Phone No.:** 360-373-1405 **Fax No.:** 360-377-2091 **Emergency Phone No.:** 1-888-522-1130

Persons Interviewed	**Title**	**Phone No.**
Rick Coy	District Operations Manager	360-405-4230
Chris Bossard	District Manager	360-405-4224
Patti Chartrey	Pipeline Safety Specialist	360-405-4231
Chanda Marek	Director, Regions	360-405-4220
Vicki Ganow	Pipeline Safety Specialist	360-788-2381
Mike Eutsey	Manager Standards and Compliance	360-734-4576
Morgan Gray	Corrosion Tech	360-405-4233

GAS SYSTEM OPERATIONS	
Gas Supplier	**Williams Pipeline**
Services: ***Residential*** **29,264** ***Commercial*** **2,568** ***Industrial*** *8* ***Other*** **N/A**	
Number of reportable safety related conditions last year **None**	Number of deferred leaks in system **None**

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GAS SYSTEM OPERATIONS			
Number of non-reportable safety related conditions last year **None**		Number of third party hits last year **33**	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) **17.24 miles all in Class 3**		Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) **626.46 miles all in class 4**	
Operating Pressure(s):		**MAOP (Within last year)**	**Actual Operating Pressure (At time of Inspection)**
Feeder:	**Williams Pipeline**	**809**	**706**
Town:	**Shelton R-11**	**499**	**455**
Other:	**N/A**	**N/A**	**N/A**
Does the operator have any transmission pipelines?	**Yes**		
Compressor stations? Use Attachment 1.	**No compression in this unit**		

Pipe Specifications:			
Year Installed (Range)	**1958 to present**	Pipe Diameters (Range)	**½" to 12"**
Material Type	**Steel and PE**	Line Pipe Specification Used	**API 5l, 3408 PE, 2406 MDPE, X42, X46, X52**
Mileage	**Transmission – 17.24 miles** **Man – 626.46 miles** **Services – 458.25 miles** **Unknown included in total above:** **Services – 1.25 miles** **Mains – 1.21 miles**	SMYS % **8" Kitsap – 24.88%** **8" Bremerton – 47.69%** **12" Bremerton – 19.61%**	**8" Kitsap Peninsula – Wt and grade verified** **8" Bremerton 47.69%** **Verification in 2015 – 2017** **12" Bremerton 19.61%** **As built info available**

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** 3/5/2015

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:** N/A Transmission not part of dist. Insp.

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. 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. Include operator contact information with all updates.	X			

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	REPORTING RECORDS		S	U	N/A	N/C
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?	X			
3.	191.5	Immediate Notice of certain incidents to **NRC (800) 424-8802,** or electronically at http://www.nrc.uscg.mil/nrchp.html**,** and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. **NRC #1082020 incident at O St and National Avenue that happened on 04/22/2015 reportable due to cost. Reported 5/21/15**	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 section.	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 NONE REQUIRED			X	
6.	191.15(c)	Supplemental report (to 30-day follow-up) NONE REQUIRED			X	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(NOTE: June 15, 2011 for the year 2010).*	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 **Verified by letter on April 2012**	X			
9.	191.23	Filing the **Safety Related Condition Report** (SRCR) NONE REQUIRED			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: • 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 REQUIRED			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential **Safety Related Conditions** **CP 720-11.026**	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections **No offshore pipelines.**			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports **None in district.**			X	

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		REPORTING RECORDS	S	U	N/A	N/C
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;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; **None in district.**			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars;	X			
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas; **None in district.**			X	
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	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 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;	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;	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 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 district.**			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP **None in district.**			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;	X			
29.	480-93-200(4)(b)	The extent of injuries and damage;	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;	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;	X			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	X			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			
37.	480-93-200(4)(j)	Line type;	X			
38.	480-93-200(4)(k)	City and county of incident; and	X			
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	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** **No failure analysis required.**			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)				

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		REPORTING RECORDS	S	U	N/A	N/C
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)	X			
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?	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. **CP835-13.045**	X			
46.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
47.	480-93-200(8)(a)	• Notification requirements for excavators under RCW 19.122.050(1)	X			
48.	480-93-200(8)(b)	• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and	X			
49.	480-93-200(8)(c)	• 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…** • 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) **No incidences under this requirement.**			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	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.	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 **Updated 8/252014**	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

		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 **Reviewed the notice given to customers.**	X			

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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? **CP647-12**	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? **In the annual report.**	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 **Not reviewed during this inspection. Procedures have been reviewed previously and have not changed.**			X	
62.	192.227	Welder Qualification **Reviewed records for Snelson and company crews back to beginning of 2013.**	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified **2/Yr (7.5Months)** **No appendix C welders.**			X	
64.	480-93-080(2)	Plastic pipe joiners re-qualified **1/Yr (15 Months)** **Reviewed records for Snelson and company crews back to beginning of 2013.**	X			
65.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period **All fusors are requalified within the 12 month timeframe.**	X			
66.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners **1/Yr (12Months)** **Joints are not tracked. Quals are done at less than 12 month frequencies.**			X	
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 **One casing they know of with a vent.**	X			
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains **Observed no mains installed during random crew inspections.**			X	
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services **Observed during random crew inspections.**	X			
70.	192.241(a)	Visual Weld Inspector Training/Experience **CP760, welders inspect all of their own welds.**	X			
71.	192.243(b)(2)	Nondestructive Technician Qualification **They use Northwest Inspection.**	X			
72.	192.243(c)	NDT procedures **No jobs requiring NDT since last inspection.**			X	
73.	192.243(f)	Total Number of Girth Welds **No jobs under this requirement since last inspection.**			X	
74.	192.243(f)	Number of Welds Inspected by NDT **No jobs under this requirement since last inspection.**			X	
75.	192.243(f)	Number of Welds Rejected **No jobs under this requirement since last inspection.**			X	
76.	192.243(f)	Disposition of each Weld Rejected **No jobs under this requirement since last inspection.**			X	
77.	.273/.283	Qualified Joining Procedures Including Test Results **Not reviewed during this inspection.**			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances **Observed during random crew inspections.**	X			
80.	192.327	Amount, location, cover of each size of pipe installed **Observed during random crew inspections in the area.**	X			
81.	480-93-160(1)	Report filed **45 days** prior to construction or replacement of transmission pipelines **≥ 100** feet in length **No Transmission.**			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: **No Transmission.**			X	
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; **No Transmission.**			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. **No Transmission.**			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 **No Transmission.**			X	
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; **No Transmission.**			X	
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. **No Transmission.**			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; **No Transmission.**			X	
89.	480-93-160(2)(g)	Welding specifications; and **No Transmission.**			X	
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. **No Transmission.**			X	
91.	480-93-170(1) 11:15 AM Broke for lunch	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress **≥ 20% SMYS**? **No Transmission.**			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) **All new instruments issued in 2014.**	X			
95.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines **> 60 psig** **No lowering done since last inspection.**			X	
96.	480-93-175(4)	Leak survey within **30 days** of moving or lowering pipelines **≤ 60 psig** **Not applicable**			X	

Comments:

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		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** **No installations since last inspection.**			X	
98.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – **5 years**	X			
99.	192.605(a)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09	X			
100.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel **All info is available on crew laptops in their vehicles.**	X			
101.	480-93-018(3)	Records, including maps and drawings updated within **6 months** of completion of construction activity? **Pulled crew sheets from 6 months back to ensure they're mapped.**	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures **One crew per month has their work reviewed and a checklist is created.** **CP780-13.072**	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures **Transmission not included in this inspection.**			X	
104.	192.609	Class Location Study (**If applicable)** **Nothing operating at a high enough stress level to require a class study.** **Transmission not included in this inspection.**			X	
105.	192.611	Confirmation or revision of MAOP **Nothing operating at a high enough stress level to require a class study.** **Transmission not included in this inspection.**			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) **CP835-13**	X			
108.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? **Done in house.**			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? **Done in house.**			X	
110.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? **CP503**	X			
111.		Review operator locating and excavation procedures for compliance with state law and regulations.	X			
112.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. **Reviewed a sampling of one call tickets and all were done same day to next day of call in.**			X	

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		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
113.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? **Task 14.40 DOT refer to tab 60.**	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? **CNG 625 standby dig form**	X			

Comments:

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 **CP 925**	X			
117.	192.615(b)(1)	Location Specific Emergency Plan	X			
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training **CP 925.021** **Online CBT's required for emergency response and blowing gas response.** **MEA (Midwest Energy Association) training good for 3 years for blowing gas.**	X			
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. **Done for reportable**	X			
120.	192.615(c)	Liaison Program with Public Officials **CP500**	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: **Audit was conducted November 2014 and all requirements were satisfactory.**	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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Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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<table>
<tr><td>125.</td><td></td><td>
<table>
<tr><th>Stakeholder Audience (LDC's)</th><th>Baseline Message Frequency (starting from effective date of Plan)</th></tr>
<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>Stakeholder Audience (Transmission line operators)</th><th>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>
</table>
</td><td></td><td></td><td></td><td></td></tr>
<tr><td>126.</td><td></td><td>* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.</td><td></td><td></td><td></td><td></td></tr>
<tr><td>127.</td><td>192.616(g)</td><td>The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.
Audit was conducted November 2014 and all requirements were satisfactory.</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>128.</td><td>.616(h)</td><td>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)
Audit was conducted November 2014 and all requirements were satisfactory.</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>129.</td><td>192.616(j)</td><td>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 LP systems.</td><td></td><td></td><td>X</td><td></td></tr>
<tr><td>130.</td><td>192.617</td><td>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)
No accidents requiring lab analysis.</td><td></td><td></td><td>X</td><td></td></tr>
</table>

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) **All test records reviewed were good.**	X			
132.	480-93-015(1) Stopped here 4PM	Odorization of Gas – Concentrations adequate In October 2014 CNG conducted a modification on the Shelton gate station where the odorization station is installed that provides odorant for the Bremerton District. A Management of Change form was completed that required certain steps to maintain adequate odorization in Bremerton. I reviewed the procedure and records and the procedure appears to have been followed. For some reason the sniff tests in October through December started to indicate that the odorant level was inadequate. CNG made weekly adjustments and conducted weekly sniff tests until the odorant level rose to adequate levels. This took until December 26th in some cases. After thoroughly discussing this issue with CNG personnel it was determined that CNG did everything they could to get the odorant levels back to code required levels. This issue was discussed with Pipeline Safety management and it was decided that a violation would not be written. As a side note, CNG did agree to make a recommended procedural change regarding the term prompt response as required by WAC codes when low reads are found. This procedural change would not have affected the odorant issue but was a necessary change to ensure adequate response by CNG personnel responding to low odorant levels when detected by sniff tests.	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing Notes on the 11/3 adjustment – why **11/5 low read –** 3rd – adjusted 10th - adjusted 17th - adjusted 24th – adjusted no adjustments after this because they were waiting for the odorant to move through the system. Dec 26th good again	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements **See notes above.**	X			
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
136.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months)** **These are in the leak surveys and quarterly patrols.**	X			
137.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days?**	X			
138.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on **Reviewed service install records.**	X			
139.	480-93-155(1)	Up-rating of system MAOP to **>60 psig**? Procedures and specifications submitted **45 days** prior? **No uprates**			X	
140.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	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; None in district			X	
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? None in district			X	
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within **30 days** of a leak repair?	X			

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144.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	X			
145.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X			
146.	480-93-188(1)	Gas leak surveys	X			
147.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X			
148.	480-93-188(3)	Leak survey frequency **(Refer to Table Below)**	X			

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

149.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs **Reviewed all post construction surveys for 2013**	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 **Reviewed all post construction surveys for 2013**	X			
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected **None since last insp.**			X	
152.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions **None since last insp.**			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.	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)	X			
155.	480-93-188(6)	Leak program - Self Audits	X			
156.	192.709	Patrolling (Transmission Lines) (**Refer to Table Below**) .705 **Not reviewing transmission during this inspection.**			X	

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

157.	192.709	Leak Surveys (Transmission Lines) (**Refer to Table Below**) .706 **Not reviewing transmission during this inspection.**			X	

Class Location	Required	Not Exceed
1 and 2	**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) **All quarterly**	X			
159.	192.603(b)	Patrolling Outside Business District (**2 per yr/7½ months**) 192.721(b)(2) **All quarterly**	X			
160.	192.603(b)	Leakage Survey - Outside Business District (**5 years**) 192 .723(b)(1) **Reviewed a sampling of 5 year surveys for 2014 and 2009 for Belfair and Bremerton**	X			

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161.	192.603(b)	Leakage Survey 192.723(b)(2) • Outside Business District (**5 years**) • Cathodically unprotected distribution lines (**3 years**)	X			
162.	192.603(b)	Tests for Reinstating Service Lines 192.725	X			
163.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 NONE IN DISTRICT			X	
164.	192.709	Pressure Limiting and Regulating Stations (**1 per yr/15 months**) .739 **Reviewed 2013 and 2014 station maintenance records.**	X			
165.	192.709	Pressure Limiting and Regulator Stations – Capacity (**1 per yr/15 months**) .743	X			
166.	192.709	Valve Maintenance – Transmission (**1 per yr/15 months**) .745 **Not reviewing transmission during this inspection.**			X	
167.	192.709	Valve Maintenance – Distribution (**1 per yr/15 months**) .747 **Reviewed 2013 and 2014**	X			
168.	480-93-100(3)	Service valve maintenance **(1 per yr/15 months)** **Reviewed 2013 and 2014**	X			
169.	192.709	Vault maintenance (**≥200 cubic feet**)(**1 per yr/15 months**) .749 **None this size.**			X	
170.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751	X			
171.	192. 603(b)	Welding – Procedure 192.225(b) **Reviewed procedure for welder requalification.**	X			
172.	192. 603(b)	Welding – Welder Qualification 192.227/.229	X			
173.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) **Uses a contractor. No NDT since last inspection.**			X	
174.	192.709	NDT Records (**pipeline life**) .243(f) **Uses a contractor. No NDT since last inspection.**			X	
175.	192.709	Repair: pipe (**pipeline life**); Other than pipe (**5 years**) **Reviewed one Clockspring type repair on a HP line.**	X			
176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) **No transmission inspected in this review.**			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**) **Reviewed 2013 and 2014 - ALL**	X			
180.	192.491	Test Lead Maintenance .471	X			
181.	192.491	Maps or Records .491(a)	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
182.	192.491	Examination of Buried Pipe when exposed .459 **Reviewed during leak report review.**	X			
183.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed **Reviewed during leak report review. CP reads were recorded for all exposed steel.**	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) **No critical bonds**			X	
187.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c) **No critical bonds**			X	
188.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) **Two shorted casings. One fixed and one to be replaced. Leak surveys done every 6 months.**	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) **No unprotected pipelines.**			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			
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 **Cleared one and one to be replaced.**	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 NONE			X	
198.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) **Corrosive gas not transported.**			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 **No coupons used.**			X	
201.	192.491	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481 **Reviewed a sampling of survey points.**	X			
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	X			

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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?	X			
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables				X
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	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.	X			
208.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?	X			
209.	480-93-015(1)	Odorization	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	X			
212.	192.455	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	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				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?	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?**	X			
227.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**)				X
228.	192.195	Overpressure protection designed and installed where required?	X			
229.	192.739/743	Pressure Limiting and Regulating Devices (**Mechanical/Capacities**)	X			
230.	192.741	Telemetering, Recording Gauges				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)				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	X			

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		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
		pipeline in conduit, to minimize any potential hazards				
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?			X	
240.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?			X	
241.	192.745	Valve Maintenance (Transmission)			X	
242.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
Rectifier	GB04	Bremerton
CP Test Site	1563 Thompson	Bremerton
Rectifier	GB09	Silverdale
District Regulator	R-73	Silverdale
District Regulator	R-41	Poulsbo

Comments:

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

Number	Date	Subject
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 NO compressor station in District
Distribution Operator Compressor Station Inspection

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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				
245.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units				
246.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (**1 per yr/15 months**), prompt repair or replacement				
247.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings				
248.		(b) Tank must be protected according to **NFPA #30**				
249.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (**must be performance tested**), unless:				
250.		• **50% of the upright side areas** are permanently open, or				
251.		• It is an unattended field compressor station of **1000 hp or less**				

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**)				
253.		.731(c)	Compressor Station Emergency Shutdown (**1 per yr/15 months**)				
254.		.736(c)	Compressor Stations – Detection and Alarms (**Performance Test**)				

Comments:

			COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
255.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits				
256.			Door latch must open from inside without a key				
257.			Doors must swing outward				
258.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit				
259.			Each gate located within 200 ft of any compressor plant building must open outward				
260.			When occupied, the door must be opened from the inside without a key				
261.		(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?**				
262.	.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?				
263.		(b)	Do the liquid separators have a manual means of removing liquids?				

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			COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
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?				
265.	.167	(a)	ESD system must:				
266.			- Discharge blowdown gas to a safe location				
267.			- Block and blow down the gas in the station				
268.			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers				
269.			- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage				
270.			ESD system must be operable from at least two locations, each of which is:				
271.	.167		- Outside the gas area of the station				
272.			- Not more than 500 feet from the limits of the station				
273.			- ESD switches near emergency exits?				
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.			▪ The gas pressure equals MAOP plus 15%?				
278.			▪ An uncontrolled fire occurs on the platform?				
279.			- For compressor station in a building, when				
280.			▪ An uncontrolled fire occurs in the building?				
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)?				
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		Is each compressor station building adequately ventilated?				
288.	.457		Is all buried piping cathodically protected?				
289.	.481		Atmospheric corrosion of aboveground facilities				
290.	.603		Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?				
291.			Are facility maps current/up-to-date?				
292.	.615		Emergency Plan for the station on site?				
293.	.619		Review pressure recording charts and/or SCADA				
294.	.707		Markers				
295.	.731		Overpressure protection – relief's or shutdowns				
296.	.735		Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?				
297.			Is aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30?**				

Attachment 1 NO compressor station in District
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) (Note: Facilities may be "Grandfathered")			S	U	N/A	N/C
298.	.736	Gas detection – location				

Comments: