

PHMSA Form 24 Question Set (IA Equivalent)
Distribution Integrity Management Program (GDIM) Implementation Inspection Form

Inspection ID:		6774	
Name of Operator:		Cascade Natural Gas Corporation	
OPID No. 2128		Unit ID No. Yakima	
HQ Address:		System/Unit Name & Address:	
8113 W. Grandridge Blvd Kennewick, WA 99336		Cascade Natural Gas Corporation 1910 Racine Street Bellingham WA 98229-4707	
Operator Official:	Eric Martuscelli	Address:	8113 Grandridge Blvd
Title:	509.572.0294	City:	Kennewick
Phone:	509.737.9803	State:	WA
Emergency Phone/Cell:	1.888.522.1130	Zip Code:	99336
Persons Interviewed		Title	
Kathy Bergner		District Manager	
Greg Nelson		District Operations Manager	
Chanda Marek		Region Director	
Vicki Ganow		Pipeline Safety Specialist	
State Representative(s): Scott Rukke		Inspection Date(s) Nov. 14-17, 2016	
Records Location:		Yakima District Office	

Unit Description:
Bellingham District
Portion of Unit Inspected:
Office records review with DIMP field form.

<p>Sat+ - Exceeds requirements/exemplary performance</p> <p>Sat - Meets requirements</p> <p>Con - "Concern" meets requirements, but is an area of recommendation and/or area that if not addressed may lead to non-compliance</p> <p>Unsat - Does not meet requirements</p> <p>N/A - Not Applicable</p> <p>N/C - Not Checked</p>
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Gas Distribution Integrity Management - GDIM Implementation

1. Issues Identified in Previous Integrity Management Inspections (detail) <i>Have all issues raised in previous DIMP inspections been satisfactorily addressed? (GDIM.QA.ISSUESIMPL.R) (detail)</i>						
	Sat+	Sat	Concern	Unsat	NA	NC
192.1005		X				
Notes:						

2. System Knowledge - Gaps (detail) <i>Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected? (GDIM.RA.GAPSIMPL.R) (detail)</i>						
	Sat+	Sat	Concern	Unsat	NA	NC
192.1007(a)(3)						X
Notes: To be done in a DIMP headquarters inspection.						

3. System Knowledge - Information Needed (Systems) (detail) <i>Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected? (GDIM.RA.SYSINFONEEDSIMPL.R) (detail)</i>						
	Sat+	Sat	Concern	Unsat	NA	NC
192.1007(a)(3)						X
Notes: To be done in a DIMP headquarters inspection.						

4. System Knowledge - Information Needed (O&M) (detail) <i>Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan? (GDIM.RA.OMINFONEEDSIMPL.R) (detail)</i>						
	Sat+	Sat	Concern	Unsat	NA	NC
192.1007(a)(3)						X
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5. System Knowledge - New Pipe Data (detail) *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?* (GDIM.RA.NEWPIPEIMPL.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.1007(a)(5)		X				
<p>Notes Reviewed installation records. CNG records the Lot number and Drum number for PE pipe. This is traceable back to the manufacturer. Steel – Table 5.1</p>						

6. System Knowledge - Data Collection Forms (detail) *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?* (GDIM.RA.DATAFORMIMPL.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.1007(a)		X				
<p>Notes Table 5.1 As built records are collecting manufacturers pipe information.</p>						

7. System Knowledge - SME Input (detail) *If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?* (GDIM.RA.SMEIMPL.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.1007(a)						X
<p>Notes To be done in a DIMP headquarters inspection.</p>						

8. System Knowledge - Understanding (detail) *Do operator personnel in the field understand their responsibilities under the DIMP plan?* (GDIM.RA.DEMOUNDERSTANDINGIMPL.O) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.1007(a)		X				
<p>Notes Section 1.8 in the plan. VP operations implementation of the plan. Data such as manufacturers info for materials is collected.</p>						

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9. Identify Threats - Threats Considered (New Information) (detail) *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification? (GDIM.RA.THREATCATEGORIESIMPL.R) (detail)*

192.1007(b)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

10. Identify Threats - Information Considered (Changes) (detail) *Have any changes occurred that require re-evaluation of threats and risks? (GDIM.RA.INFOCONSIDEREDIMPL.R) (detail)*

192.1007(b)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

11. Identify Threats - Outside Sources (detail) *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks? (GDIM.RA.OUTSIDESOURCESIMPL.R) (detail)*

192.1007(b)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

12. Identify Threats - Implementation (Update) (detail) *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge? (GDIM.RA.IMPLEMENTTHUPDATEIMPL.R) (detail)*

192.1007(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

13. Identify Threats - Implementation (DIMP Process) (detail) *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan? (GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R) (detail)*

192.1007(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X

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14. Rank Risk - System Subdivision (Adequacy) (detail) <i>Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system? (GDIM.RA.SUBDIVIDEADEQIMPL.R) (detail)</i>						
192.1007(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

15. Rank Risk - System Subdivision (Update) (detail) <i>Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency? (GDIM.RA.SUBDIVIDEUPDATEIMPL.R) (detail)</i>						
192.1007(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

16. Rank Risk - System Subdivision (DIMP) (detail) <i>If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan? (GDIM.RA.SUBDIVIDEDIMPIMPL.R) (detail)</i>						
192.1007(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

17. Rank Risk - System Subdivision (Result) (detail) <i>If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking? (GDIM.RA.SUBDIVIDERESULTIMPL.R) (detail)</i>						
192.1007(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

18. Measures to Reduce Risk - Implementation (Update) (detail) <i>Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented? (GDIM.PM.IMPLEMENTPMIMPL.R) (detail)</i>						
192.1007(d)	Sat+	Sat	Concern	Unsat	NA	NC
						X
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PHMSA Form 24 Question Set (IA Equivalent)
Distribution Integrity Management Program (GDIM) Implementation Inspection Form

19. Measures to Reduce Risk - Implementation (Completion) (detail) *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)? (GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R) (detail)*

192.1007(d)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

20. Measures to Reduce Risk - Implementation (Re-Evaluate) (detail) *If answering "Satisfactory/Yes" to previous question implementation question GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, have risks (192.1007(c)) been re-evaluated and ranked because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate? (GDIM.PM.IMPLEMENTPMREEVALIMPL.R) (detail)*

192.1007(d)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

21. Measures to Reduce Risk - Implementation (Specific Risk) (detail) *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk? (GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R) (detail)*

192.1007(d)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

22. Measures to Reduce Risk - Leak Management (detail) *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)? (GDIM.PM.LEAKMANAGEMENTIMPL.R) (detail)*

192.1007(d)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

23. Measure Performance - Implementation (Data) (detail) *Is data being collected for the required performance measures in 192.1007(e)? (GDIM.QA.IMPLEMENTEVDATAIMPL.R) (detail)*

192.1007(e)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
Reviewed performance measures.

PHMSA Form 24 Question Set (IA Equivalent)
Distribution Integrity Management Program (GDIM) Implementation Inspection Form

24. Measure Performance - Implementation (DIMP) (detail) <i>Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan? (GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R) (detail)</i>						
192.1007(e)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
Notes Yes. Reviewed baseline and performance measures.						

25. Measure Performance - Implementation (Baseline) (detail) <i>Is each performance measure being monitored from an established baseline? (GDIM.QA.IMPLEMENTEVBASELINEIMPL.R) (detail)</i>						
192.1007(e)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
Notes Yes. Reviewed baseline and performance measures.						

26. Measure Performance - Implementation (Specific Risk) (detail) <i>Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures? (GDIM.QA.IMPLEMENTEVRISKIMPL.R) (detail)</i>						
192.1007(e)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

27. Periodic Evaluation - Implementation (Frequency) (detail) <i>Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".] (GDIM.CA.PERIODICEVALFREQIMPL.R) (detail)</i>						
192.1007(f)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

28. Periodic Evaluation - Implementation (Requirements) (detail) <i>Did the periodic evaluation include all required elements? (GDIM.CA.PERIODICEVALREQTSIMPL.R) (detail)</i>						
192.1007(f)	Sat+	Sat	Concern	Unsat	NA	NC
						X
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PHMSA Form 24 Question Set (IA Equivalent)
Distribution Integrity Management Program (GDIM) Implementation Inspection Form

29. Periodic Evaluation - Implementation (High Risk) (detail) <i>If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures? (GDIM.CA.PERIODICEVALHIRISKIMPL.R) (detail)</i>						
192.1007(f) (192.1007(e))	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

30. Periodic Evaluation - Implementation (Risk Reduction Measures) (detail) <i>If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added? (GDIM.CA.PERIODICEVALRISKREDIMPL.R) (detail)</i>						
192.1007(f)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

31. Periodic Evaluation - Implementation (Performance Measures) (detail) <i>Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added? (GDIM.CA.PERIODICEVALPRFMESIMPL.R) (detail)</i>						
192.1007(f)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

32. Periodic Evaluation - Implementation (DIMP Plan) (detail) <i>Were procedures followed in conducting periodic evaluations and program improvements? (GDIM.CA.PERIODICEVALDIMPIMPL.R) (detail)</i>						
192.1007(f)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

33. Report Results - Submittal (detail) <i>Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection? (GDIM.RR.SUBMITREPORTSIMPL.R) (detail)</i>						
192.1007(g)	Sat+	Sat	Concern	Unsat	NA	NC
						X
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34. Mechanical Fitting Failures - Information Collection (Data) (detail) (presented above)
Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?
(GDIM.RR.MECHANICALFITTINGDATAIMPL.R) (detail)

192.1009 (191.12)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
Collected and reported.

35. Mechanical Fitting Failures - Information Collection (Reporting) (detail) *Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?* (GDIM.RR.MECHANICALFITTINGRPTIMPL.R) (detail)

192.1009 (191.12)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
Collected and reported.

36. Mechanical Fitting Failures - Information Collection (DIMP) (detail) *Were procedure(s) followed for collecting the appropriate information and submitting PHMSA Form F-7100.1-2?*
(GDIM.RR.MECHANICALFITTINGDIMPIMPL.O) (detail)

192.1009 (191.12)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
Yes, collected and reported.

37. Records - Implementation (detail) *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?* (GDIM.QA.RECORDREQUIREMENTSIMPL.R) (detail)

192.1011	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
To be done in a DIMP headquarters inspection.

38. Records - Implementation (Plan Retention) (detail) *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?* (GDIM.QA.RECORDREQSRETAINIMPL.R) (detail)

192.1011	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes
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Distribution Integrity Management Program (GDIM) Implementation Inspection Form

39. Records - Implementation (DIMP) (detail) <i>Were DIMP procedures followed as applicable to records retention? (GDIM.QA.RECORDREQTSDIMPIMPL.R) (detail)</i>						
192.1011	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

40. Deviation from Periodic Inspections - Approval (detail) <i>Has approval been received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark questions 40-44 "N/A".] (GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R) (detail)</i>						
192.1013(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

41. Deviation from Periodic Inspections - Implementation (detail) <i>Have the periodic inspections been conducted at the specified alternate intervals? (GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R) (detail)</i>						
192.1013(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

42. Deviation from Periodic Inspections - Requirements (detail) <i>Have all conditions been complied with that were required as part of the alternate inspection interval approval? (GDIM.PI.PERIODICINSPDEVREQTIMPL.R) (detail)</i>						
192.1013(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

43. Deviation from Periodic Inspections - Performance Measures (detail) <i>Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented? (GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R) (detail)</i>						
192.1013(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
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 Distribution Integrity Management Program (GDIM) Implementation Inspection Form

44. Deviation from Periodic Inspections - Corrective Action (detail) <i>If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?</i> (GDIM.PI.PERIODICINSPDEVACTIONIMPL.R) (detail)						
192.1013(c)	Sat+	Sat	Concern	Unsat	NA	NC
						X
Notes To be done in a DIMP headquarters inspection.						

Additional Inspector Comments	
Considerations	<ol style="list-style-type: none"> 1. Conditions observed in the field can provide insights into the effectiveness of the operator’s DIMP plan implementation. Please comment on your general field observations. 2. Please comment on the operator’s safety culture. Safety Culture is the collective set of attitudes, values, norms and beliefs, which pipeline operator’s employees share that demonstrate a commitment to safety over competing goals and demands. A positive safety culture is essential to an organization's safety performance regardless of its size or sophistication. Characteristics of a positive safety culture include the following: <ol style="list-style-type: none"> a. Embraces safety (personnel, public, and asset) as a core value b. Ensures everyone understands the organization's safety culture goals c. Inspires, enables, and nurtures culture change when necessary d. Allocates adequate resources to ensure individuals can successfully accomplish their safety management system responsibilities e. Encourages employee engagement and ownership f. Fosters mutual trust at all levels, with open and honest communication g. Promotes a questioning and learning environment h. Reinforces positive behaviors and why they are important i. Encourages non-punitive reporting and ensures timely response to reported issues
Comments	

Acceptable Use: Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.