

Attachment 1

Distribution Operator Compressor Station Inspection

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

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	6775		
Inspector Name & Submit Date	Scott Rukke, Lead Scott Anderson		
Chief Eng Name & Review/Date	November 17, 2016		
Operator Information			
Name of Operator:	Cascade Natural Gas Corp	OP ID #:	2128
Name of Unit(s):	Yakima		
Records Location:	Yakima District 701 S. 1st Ave. Yakima, WA 98902		
Date(s) of Last (unit) Inspection:	2013	Inspection Date(s):	September 20 – 22 and October 19, 2016

<p>Inspection Summary:</p> <p>Reviewed records in the Yakima District office on September 20-22, 2016. Returned October 19th to conduct a field facilities inspection. In addition to the standard inspection a D&A field form was used, a DIMP field form 24 was used, an OQ field form was used and a PA field form was used.</p>

HQ Address: 8113 W Grandridge Blvd Kennewick WA 99336	System/Unit Name & Address: Yakima District Office 701S. 1 st Ave. Yakima, WA 98902	
Co. Official: Eric Martuscelli Phone No.: 509. 572.0294 Fax No.: 509.737.9803 Emergency Phone No.: 1.888.522.1130	Phone No.: 509.457.8176 Fax No.: 509.457.5539 Emergency Phone No.: 1.888.522.1130	
Persons Interviewed	Title	Phone No.
Chris Rivas	District Manager	509.225.3733
Roy Klein	District Operations Manager	509.225.3709
Kevin McCallum	Pipeline Safety Specialist	509.736.5542
Patti Chartrey	Pipeline Safety Specialist	360.405.4231
Chris Grissom	Pipeline Safety Specialist	541.706.6292
Mike Eutsey	Manager, Standards & Compliance	509.734.4576
Jeff Staudenmaier	Director, Regions	541.706.6280

<p>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.</p> <p>(check one below and enter appropriate date)</p>	
<input checked="" type="checkbox"/> Team inspection was performed (Within the past five years.) or,	Date: June 18-21, 2012

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<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	2012
<input checked="" type="checkbox"/>	OQ Program Review (PHMSA Form 14)	Date:	2014

GAS SYSTEM OPERATIONS			
Gas Supplier	Williams		
Services: <i>Residential 24,486 Commercial 4,830 Industrial 174 Other 0</i>			
Number of reportable safety related conditions last year		1	
Number of <u>non-reportable</u> safety related conditions last year		0	
Number of deferred leaks in system		3	
Number of third party hits last year		60	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)		7.18	
Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)		647.98	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	See below	See below	
Town:	See below	See below	
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 1.	N/A		
Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Comments: None			

Pipe Specifications:			
Year Installed (Range)	1954 - present	Pipe Diameters (Range)	½" to 8"
Material Type	Steel and PE	Line Pipe Specification Used	API 5L, 3408 PE, 2406 MDPE, X42, X52, X46
Mileage	Trans – 7.18 miles Main – 647.98 miles Service – 456 miles	SMYS %	29.37%

Regulator #	Town	Inlet MAOP	Outlet MAOP
R-54	Grandview	250	60
R-11 (retired)	Granger & Toppenish	400	60
R-56	Granger	175	60
R-61	Granger & Toppenish	400	175
R-12	Moxee	250	60
R-39	Moxee	250	60
R-1	Prosser	250	60
R-02	Selah	275	60
R-17	Selah	250	60
R-08	Sunnyside	200	51
R-45	Sunnyside	200	51

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R-22	Toppenish	400	56
R-25	Toppenish	175	56
R-28	Wapato	152	60
R-01	Yakima	200	60
R-03	Yakima	200	60
R-05	Yakima	200	60
R-43	Yakima	200	60
R-60	Zillah	400	41

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** 11/15/2016

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:** To be done with the transmission inspection REMOVE QUESTION

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)	<p>For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates.</p> <p>Transmission.</p>			X	
2.	RCW 81.88.080	<p>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?</p> <p>Submitted in 2013,</p>	X			
3.	191.5	<p>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.</p> <p>One event that was reported over 3mm cf, NRC #1075436</p>	X			
4.	191.7	<p>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.</p> <p>One SRCR, 20160023</p>	X			

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REPORTING RECORDS			S	U	N/A	N/C
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	X			
6.	191.15(c)	Supplemental report (to 30-day follow-up)	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 2128 is CNG's OP ID.	X			
9.	191.23	Filing the Safety Related Condition Report (SRCR)	X			
10.	191.25 49 U.S.C. 60139, Subsection (b)(2)	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery. Note: Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA on or before the fifth day following the date on which the exceedance occurs. The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <ul style="list-style-type: none"> • The name and principal address of the operator date of the report, name, job title, and business telephone number of the person submitting the report. • The name, job title, and business telephone number of the person who determined the condition exists. • The date the condition was discovered and the date the condition was first determined to exist. • The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored. • The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action. Discovered 2/19/2016 Filed on the 23rd of Feb 2016.	X			
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions CP-780	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections None in district.			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports None in district.			X	
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; none			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; none			X	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; 2-2014 and 2-1015	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas; none			X	
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; none			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			X	

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REPORTING RECORDS			S	U	N/A	N/C
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; 1-2016	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; 2014 – 4 2015 and 16 -1	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			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			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP 2014 – 3 2015 - 1	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; none in district			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 none in district			X	
42.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form)				
43.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) CP 835	X			
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 <u>without facility locates</u> first being completed? CNG Form 835	X			
45.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? Note: Records maintained for two years and made available to the commission upon request.	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)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 	X			

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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)	<p>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</p> <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) <p>None occurred in district.</p>			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 CP 780 thru PA program CP 500. Reviewed a list of their	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 Reviewed the MIS data form. 95 covered employees, CNG only.	X			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
57.	192.16	<p>Customer notification - Customers notified, within 90 days, of their responsibility for those service lines not maintained by the operator</p> <p>CP 780 says each new customer will be notified once in writing.</p>	X			
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
59.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? Yes, on the annual report.	X			

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Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
60.	480-93-013	OQ records for personnel performing New Construction covered tasks Zillah construction job under the Yakima River. Northwest Inspection for radiographic and magnetic particle testing.	X			
61.	192.225	Test Results to Qualify Welding Procedures Reviewed the destructive qualification test results for the Zillah High Pressure replacement.	X			
62.	192.227	Welder Qualification Reviewed all welder quals for the district for 2014 – 2016.	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 all fusion quals for all district fusors from 2014 – 2016.	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) Not done, no fusors over 12 months.			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 Welders are qualified to inspect their own welds.	X			
71.	192.243(b)(2)	Nondestructive Technician Qualification CNG uses NW Inspection and they were all Level II inspectors.	X			
72.	192.243(c)	NDT procedures Uses contractor procedures per CP 760.	X			
73.	192.243(f)	Total Number of Girth Welds Reviewed the Zillah HP The bore under the Yakima River was 100% X-Rayed.	X			
74.	192.243(f)	Number of Welds Inspected by NDT	X			
75.	192.243(f)	Number of Welds Rejected Did not see any rejected weld records for the Zillah HP.			X	
76.	192.243(f)	Disposition of each Weld Rejected See above.			X	
77.	.273/.283	Qualified Joining Procedures Including Test Results TR-33 Generic Butt Fusion Procedure. Plastic Pipe Institute procedures are utilized along with their fusion temps and procedures.	X			
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
80.	192.327	Amount, location, cover of each size of pipe installed	X			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
81.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length THIS IS 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: THIS IS TRANSMISSION.				X
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; THIS IS 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. THIS IS 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 THIS IS TRANSMISSION.				X
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; THIS IS TRANSMISSION.				X
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. THIS IS 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; THIS IS TRANSMISSION.				X
89.	480-93-160(2)(g)	Welding specifications; and THIS IS TRANSMISSION.				X
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. THIS IS TRANSMISSION.				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? THIS IS 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? No large plats observed.			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 No steel lowering in this district.			X	
96.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig See above.			X	

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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 Reviewed Zillah HP records.	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 <u>suggested</u> 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 Employees carry laptops with all necessary info.	X			
101.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity?	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures CP 780 They use CNG 640. Reviewed a sampling of the 640 forms.	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures This is a transmission exemption. Not applicable to CNG. REMOVE				X
104.	192.609	Class Location Study (If applicable) Nothing over 40% so this does not apply. This is transmission. REMOVE				X
105.	192.611	Confirmation or revision of MAOP See above. This is transmission. REMOVE				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) Done in house.			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? In their OQ Plan.	X			
111.		Review operator locating and excavation <u>procedures</u> 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 locate requests.	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? Reviewed a sampling of locates and compared the OQ stats for the individuals performing the locates. All good.	X			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
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 CP 755. 625 Form is used.	X			

Comments:
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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	X			
117.	192.615(b)(1)	Location Specific Emergency Plan	X			
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training Mock drill conducted on 3/19/2015. CP 925 requires twice per calendar year.	X			
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Form 235	X			
120.	192.615(c)	Liaison Program with Public Officials	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:				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				

Attachment 1

Distribution Operator Compressor Station Inspection

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125.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	Annual				
		LDC Customers	Twice annually				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	2 years				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				

126.		* 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.				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)				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.				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) No lab analysis.			X	

Comments:
 PA was reviewed using form W.

Attachment 1

Distribution Operator Compressor Station Inspection

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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) Missing test records for some 50's and 60's vintage pipe. Violation written. <u>Violation #3</u>		X		
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate Reviewed monthly tests from 2014 - 2016	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing Reviewed monthly tests from 2014 - 2016	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements No reads outside the threshold of .2 - .7% gas in air as designated in their O&M manual.			X	
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Calibration records show the instrument was calibrated as necessary.	X			
136.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months)	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	X			
139.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None in district since last insp.			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;	X			
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? No foreign source leaks observed in the records.			X	
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair?	X			
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(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs Operator states none in district.			X	
149.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred Operator states none in district.			X	
150.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected One in an alley between 7th and 6th St from Edison and Grant.	X			
151.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions None			X	

Attachment 1

Distribution Operator Compressor Station Inspection

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152.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. Reviewed with leak records.	X															
153.	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															
154.	480-93-188(6)	Leak program - Self Audits	X															
155.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 TRANSMISSION REMOVE				X												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Class Location</th> <th style="width: 35%;">At Highway and Railroad Crossings</th> <th style="width: 30%;">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)
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156.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 TRANSMISSION REMOVE.				X												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Class Location</th> <th style="width: 30%;">Required</th> <th style="width: 35%;">Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</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 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
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3	2/yr	7½ months																
4	4/yr	4½ months																
157.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1)	X															
158.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	X															
159.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) Some business district leak survey maps were not marked as completed and exceeded 15 months. <u>Violation #1</u>		X														
160.	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) 	X															
161.	192.603(b)	Tests for Reinstating Service Lines 192.725	X															
162.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 None in district.			X													
163.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X															
164.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X															
165.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 TRANSMISSION REMOVE				X												
166.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	X															
167.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X															
168.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 No vaults over 200 CF			X													
169.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 None observed in district				X												
170.	192.603(b)	Welding – Procedure 192.225(b) Reviewed for the Zillah HP line.	X															
171.	192.603(b)	Welding – Welder Qualification 192.227/.229 Reviewed all district welder quals.	X															

Attachment 1

Distribution Operator Compressor Station Inspection

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172.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) Reviewed records for the Zillah HP line.	X			
173.	192.709	NDT Records (pipeline life) .243(f) Reviewed Zillah HP line records.	X			
174.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	X			
175.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) TRANSMISSION REMOVE				X

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
176.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
177.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)	X			
178.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	X			
179.	192.491	Test Lead Maintenance .471	X			
180.	192.491	Maps or Records .491(a)	X			
181.	192.491	Examination of Buried Pipe when exposed .459	X			
182.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
183.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X			
184.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	X			
185.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) On the bi-monthly Critical interference bond <i>An interference bond whose failure would jeopardize structural protection. 'Critical bonds' are metallic connections between adjacent buried structures that, if not connected, would allow detrimental corrosion to occur on one facility. The bond is only critical to the more negative pipeline facility, or the one losing current to the other facility.</i>	X			
186.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) Interference bond <i>An intentional metallic connection, between metallic systems in contact with a common electrolyte, designed to control electrical current interchange between the systems.</i>	X			
187.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
188.	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			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
189.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) No unprotected pipeline facilities in WA State			X	
190.	192.491	Electrical Isolation (Including Casings) .467	X			
191.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
192.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods CNG uses a Tinkor Razor test for casings with no test leads.	X			
193.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days	X			
194.	480-93-110(5)(c)	Casing shorts cleared when practical One casing removed.	X			
195.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months Missed 5 casing follow up leak surveys for the February 2015 survey. <u>Violation #2.</u>		X		
196.	192.491	Interference Currents .473	X			
197.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) No corrosive gas.			X	
198.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) Reviewed CNG form 625 for internal inspection n the Zillah transmission replacement. No internal inspection records were available. A crew member that was on site filled out an inspection report based on the tap coupons that were removed.	X			
199.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 No coupons.			X	
200.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481	X			
201.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Several sections of steel pipe replaced or repaired after corrosion or 3rd party damage.	X			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
202.	192.161	Supports and anchors	X			
203.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? None observed				X
204.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
205.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	X			
206.	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			
207.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified?	X			
208.	480-93-015(1)	Odorization None observed				X
209.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
210.	192.179	Valve Protection from Tampering or Damage	X			
211.	192.455	Pipeline coatings meet requirements of 192.461 (<i>for buried pipelines installed after 7/31/71</i>)	X			
212.	192.463	Levels of cathodic protection	X			
213.	192.465	Rectifiers	X			
214.	192.467	CP - Electrical Isolation	X			
215.	192.476	Systems designed to reduce internal corrosion None observed				X
216.	192.479	Pipeline Components exposed to the atmosphere	X			
217.	192.481	Atmospheric Corrosion: monitoring	X			
218.	192.491	Test Stations – Sufficient Number .469	X			
219.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
220.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
221.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	X			
222.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
223.	192.605	Knowledge of Operating Personnel	X			
224.	480-93-124	Pipeline markers	X			
225.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
226.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	X			
227.	192.195	Overpressure protection designed and installed where required?	X			
228.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			
229.	192.741	Telemetry, Recording Gauges None observed				X
230.	192.751	Warning Signs None observed				X
231.	192.355	Customer meters and regulators. Protection from damage	X			
232.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. None observed			X	
233.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
234.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	X			
235.	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			
236.	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			
237.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No X				

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
238.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?			X	
239.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?			X	
240.	192.745	Valve Maintenance (Transmission)			X	
241.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited: **See field form.**

Facility Type	Facility ID Number	Location
See field form.		

Comments: