Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Systems
Procedures and Plan Review

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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A completed **Inspection Checklist, Cover Letter and Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/Docket Number	8022		
Inspector Name & Submit Date	Dave Cullom 4/24/2020		
Sr. Eng Name & Review/Date	Joe Subsits, 4/27/2020		
Operator Information			
Name of Operator:	J.R. Simplot Company	**OP ID #:**	32395
Name of Unit(s):	J.R. Simplot Company – Moses Lake		
Records Location:	Moses Lake, Wa		
Date(s) of Last Review:	4/3/2015	**Inspection Date(s):**	4/14/2020-4/17/2020

Inspection Summary:

****No areas of concern or probable violations noted****

This was a plan and procedure review of the operations and maintenance (O&M) manual. Simplot will be transitioning to a new O&M manual in July 2020. Below is the summary from the records and field inspection to provide some additional system and operations information.

The J.R. Simplot potato processing facility located in Moses Lake includes a bio gas digester, non-jurisdictional compressor, and 8-inch diameter high density polyethylene (HDPE) bio gas transmission pipeline in Grant County with a length of 1.4 miles. The pipeline is a Class 1 Location per the 2017-2019 Annual Reports. The pipeline was subjected to a hydrostatic test pressure of 90 PSIG for 3 hours and operates at 15 psig MAOP per the manual, but original pressure test records indicated it was tested for 4 hours. There is no direct relief or worker/monitor system for overpressure protection. The compressor pump curve was reviewed, and it demonstrates that over pressurization cannot occur given the current configuration. The valve record annual testing question was not included in the original plan, but valve records were reviewed. Valve operation was performed by Matt in October 2019 for valves 1 & 2. I also reviewed 10/2/2018 records where Matt operated both valves. Hector, in 2017, operated valves 1 & 2 on 5/9/2017 and 11/6/2017.

HQ Address:		**System/Unit Name & Address:**	
1099 West Front Street Boise, Idaho 83702		J.R. Simplot Company – Moses Lake 14121 Wheeler Road, North East Moses Lake, WA 98837	
Co. Official:	Mike Davis	**Phone No.:**	
Phone No.:	(509) 793-1134	**Fax No.:**	
Fax No.:		**Emergency Phone No.:**	(509) 750-0113
Emergency Phone No.:			

Persons Interviewed	**Title**	**Phone No.**
Lance Carter	Environmental Manager	(509) 793-1188
Stephen Hernandez	Consultant	(720) 647-3147

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GAS SYSTEM OPERATIONS			
Gas Supplier J.R. Simplot Company is the user and producer			
Operating Pressure(s):		**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:			
Town:			
Other:	13 psig	15	System was in shutdown.
Does the operator have any transmission pipelines? Yes			

Pipe Specifications:			
Year Installed (Range)	2009	Pipe Diameters (Range)	8”
Material Type	HDPE SDR-11	Line Pipe Specification Used	ASTM D-2513
Mileage	1.4 miles per the 2019 AR	SMYS %	SMYS is part of the design formula for steel pipe. This pipe is PE.

49 CFR PART 191 & CHAPTER 480-93 WAC

		REPORTING PROCEDURES	S	U	N/A	N/C
1.	480-93-180 (1)	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. (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). .191.5 *****Notes – PnP Manual Section 9.3 P-6 contains the 3 mmcf reference. Form F-8 Transmission System Incident report. – No product released calc found ~360,000 CFD is averaged over the last 16 months for flow. Max flow day is 758,000 CFD The operator would be able to shut down the line within an hour. N/A for calc. Manual updated *****	X			
2.		Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline unless an alternative reporting method is authorized IAW with paragraph (d) of this section. (Amdt. 191-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). 191.7 *****Notes – PnP Manual Procedure P-6.6– No initial filing electronic submittal referenced – only follow-ups.*****	X			
3.		Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9144** (Within **2 hours**) for events which; 480-93-200(1) *****Notes – PnP Manual 9.2.1*****				
4.		(a) Results in a fatality or personal injury requiring hospitalization; *****Notes – PnP Manual 9.2.1.1a*****	X			
5.		(b) Results in damage to the property of the operator and others of a combined total exceeding fifty thousand dollars; *****Notes – PnP Manual 9.2.1b*****	X			
6.		(c) Results in the evacuation of a building, or high occupancy structures or areas. *****Notes – PnP Manual 9.2.1.1c*****	X			
7.		(d) Results in the unintentional ignition of gas; *****Notes – PnP Manual 9.2.1.1d*****	X			
8.		(e) Results in the unscheduled interruption of service furnished by any operator to twenty-five or more distribution customers; *****Notes – This requirement is for distribution operators*****			X	
9.		(f) Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; *****Notes – PnP Manual 9.2.1.1e*****	X			

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		REPORTING PROCEDURES	S	U	N/A	N/C
10.		g) Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or *****Notes – PnP Manual 9.2.1.1f*****	X			
11.	480-93-180 (1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within **24 hours**) for; 480-93-200(2) *****Notes – PnP Manual 9.2.2.1*****	X			
12.		(a) The uncontrolled release of gas for more than two hours; *****Notes – PnP Manual 9.2.2.1a*****	X			
13.		b) The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; *****Notes – PnP Manual 9.2.2.1b*****	X			
14.		(c) A pipeline or system operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or *****Notes – PnP Manual 9.2.2.1c*****	X			
15.		(d) A pipeline or system pressure exceeding the MAOP. *****Notes – PnP Manual 9.2.2.1d*****	X			
16.		30 day written incident (federal) reports; (DOT Form F 7100.1) 191.9(a) For Transmission & Gathering Lines; (DOT Form F 7100.2) 191.15(a)30-day follow-up written report Submittal must be electronically to http://portal.phmsa.dot.gov/pipeline (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). *****Notes – PnP Manual Procedure P6.6*****	X			
17.		Supplemental incident reports 191.15(c) *****Notes – PnP Manual 9.2.4*****	X			
18.		Written incident reports **filed with the commission** (within 30 days); and include the following; 480-93-200(4) (a) thru (g) *****Notes – PnP Manual 9.2.2a-g I JR Manual fell short of the regulations, but h-l were added. The regs have (4) Each gas pipeline company must provide to the commission a written report within thirty days of the initial telephonic report required under subsections (1) and (2) of this section. At a minimum, the written reports must include the following:** **(a) Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;** **(b) The extent of such injuries and damage;** **(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;** **(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;** **(e) The date and time the gas pipeline company was first notified of the incident;** **(f) The date and time the gas pipeline company's first responders arrived on-site;** **(g) The date and time the gas pipeline was made safe;** **(h) The date, time, and type of any temporary or permanent repair that was made;** **(i) The cost of the incident to the gas pipeline company;** **(j) Line type;** **(k) City and county of incident; and** **(l) Any other information deemed necessary by the commission.** ******* 480-93-200(4)(e) The date and time the gas pipeline company was first notified o 480-93-200(4)(f) The date and time the ((operators')) gas pipeline company's first	X			
19.	480-93-180 (1)	Supplemental reports **filed with the commission** 480-93-200(5) *****Notes – PnP Manual 9.2.4*****	X			
20.	480-93-180 (1)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure 480-93-200(6) *****Notes – PnP Manual 9.2.3.1*****	X			
21.		Annual Report (DOT Form PHMSA F-7100.2-1) For Transmission & Gathering 191.17(a) Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(NOTE: June 15, 2013 for the year 2012).* *****Notes – PnP Manual 9.1.1*****	X			
22.		**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) 480-93-200(7)				

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		REPORTING PROCEDURES	S	U	N/A	N/C
23.	480-93-180 (1)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) 480-93-200(7)(a) *****Notes – PnP Manual 9.2.8.1*****	X			
24.		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? 480-93-200(7)(b) *****Notes – PnP Manual 9.2.8.3a*****	X			
25.		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? 480-93-200(7)(c) **Note:** Records maintained for two years and made available to the commission upon request. *****Notes – PnP Manual 9.2.8.2 a and b*****	X			
26.		Does the operator provide the following information to excavators who damage gas pipeline facilities? 480-93-200(8)				
27.		• Notification requirements for excavators under RCW 19.122.050(1) 200(8)(a) *****Notes – PnP Manual 9.2.8.3*****	X			
28.		• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 200(8)(b) *****Notes – PnP Manual 9.2.8.3*****	X			
29.		• 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. 200(8)(c) *****Notes – PnP Manual 9.2.8.3b*****	X			
30.		**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) *****Notes – PnP Manual 9.2.8.4.1 and .2*****	X			
		Annual Reports **filed with the commission** no later than March 15 for the proceeding calendar year 480-93-200(10) *****Notes – PnP Manual Appendix E addresses frequency *****				
31.	480-93-180 (1)	A copy of PHMSA form F-7100.1-1 or F-7100.2-1 annual report required by the PHMSA/OPS 480-93-200(10)(a) *****Notes – PnP Manual F-9 and F-29 contain the cover sheet and content*****	X			
32.		Annual report on construction defects or material failures 480-93-200(10)(b) *****Notes – PnP Manual 9.2.4.1c *****	X			
33.		Providing updated emergency contact information to the Commission and appropriate officials 480-93-200(11) *****Notes – PnP Manual 9.2.5*****	X			
34.		Providing daily construction and repair activities reports 480-93-200(12) *****Notes – PnP Manual 9.2.6.3, 9.2.6.4, 9.2.6.5 *****	X			
35.		Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form (when required) 480-93-200(13) *****Notes – PnP Manual 9.2.7*****	X			
36.		Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline 191.22 *****Notes – PnP Manual 9.5.2a*****	X			
37.		Safety related condition reports (SRCR) 191.23 *****Notes – PnP Manual Form F-25 AOCs SRCRs mentioned in Appendix F Section 9.3.4. This is also contained in Procedure P-5. Section 9.2.2 of this O&M manual specifies PHMSA and WUTC required reports. Form F-8 contains Section 4 which is recognizing a SRC. It was updated to recognizing an incident.*****	X			

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		REPORTING PROCEDURES	S	U	N/A	N/C
38.		Filing the SRCR within 5 days of determination, but not later than 10 days after discovery 191.25; 49 U.S.C. 60139, Subsection (b)(2) **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. *****Notes – PnP Manual Form F-25 AOCs SRCRs mentioned in Appendix F Section 9.3.4. This is also contained in Procedure P-5. Section 9.2.2 of this O&M manual specifies PHMSA and WUTC required reports. *****	X			
39.	192.605(d)	Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions? *****Notes – PnP Manual Form F-25 AOCs SRCRs mentioned in Appendix F Section 9.3.4. This is also contained in Procedure P-5. Section 9.2.2 of this O&M manual specifies PHMSA and WUTC required reports.*****	X			

		Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002	S	U	N/A	N/C
	49 U.S.C. 60132, Subsection (b) **ADB-08-07**	Updates to NPMS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to http://www.npms.phmsa.dot.gov/submission/ to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates. *****Notes – PnP Manual 9.1.5.3*****	X			
	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? *****Notes - The MAOP of the Simplot Pipeline is 15 PSIG per 2.4*****			X	

Comments:

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		49 CFR PART 192 SUBPART A – GENERAL CHAPTER 480-93 WAC – GAS COMPANIES---SAFETY	S	U	N/A	N/C
40.	480-93-180 (1)	Procedures for notifying new customers, within **90 days**, of their responsibility for those selections of service lines not maintained by the operator. §192.16 *****Notes – Simplot has no customers*****			X	
41.		Conversion to Service - Any pipelines previously used in service not subject to Part 192? 192.14*****Notes – Section 6.9 Conversion of Service .1 Conversion of service is not allowed.*****			X	

Comments:

		SUBPART B - MATERIALS	S	U	N/A	N/C
		Are minimum requirements prescribed for the selection and qualification of pipe and components for use in pipelines 192.51				
42.	480-93-180 (1)	For **steel** pipe, manufactured in accordance with and meet the listed specification found under Appendix B 192.55 *****Notes – The regulated portion on the line is PE*****			X	
		For **new** plastic pipe, qualified for use under this part if: 192.59(a)				
43.	480-93-180 (1)	• It is manufactured in accordance with a listed specification; and 192.59(a)(1) • It is resistant to chemicals with which contact may be anticipated. 192.59(a) (2) *****Notes – PnP Manual 11.3. Appendix D also contains the material type which is 8" HDPE SDR 11 *****	X			
		For **used** plastic pipe, qualified for use under this part if: 192.59(b)				
44.	480-93-180 (1)	• It was manufactured in accordance with a listed specification; 192.59(b)(1) • It is resistant to chemicals with which contact may be anticipated; 192.59(b)(2) • It has been used only in natural gas service. 192.59(b)(3)(4) • Its dimensions are still within the tolerances of the specification to which it was manufactured; and, 192.59(b) • It is free of visible defects. 192.59(b)(5) *****Notes – No used plastic pipe is employed. *****			X	
45.		Marking of Materials 192.63*****Notes – PnP Manual 11.3 *****	X			

Comments:

		SUBPART C – PIPE DESIGN				
		Procedures for assuring that the minimum requirements for design of pipe are met				
		For Steel Pipe	**S**	**U**	**N/A**	**N/C**
46.	480-93-180 (1)	Pipe designed of sufficient wall thickness, or installed with adequate protection, to withstand anticipated external pressures and loads that will be imposed on the pipe after installation. 192.103			X	
47.		Design formula for steel pipe. 192.105(a)			X	
48.		Yield strength (S) for steel pipe. 192.107			X	

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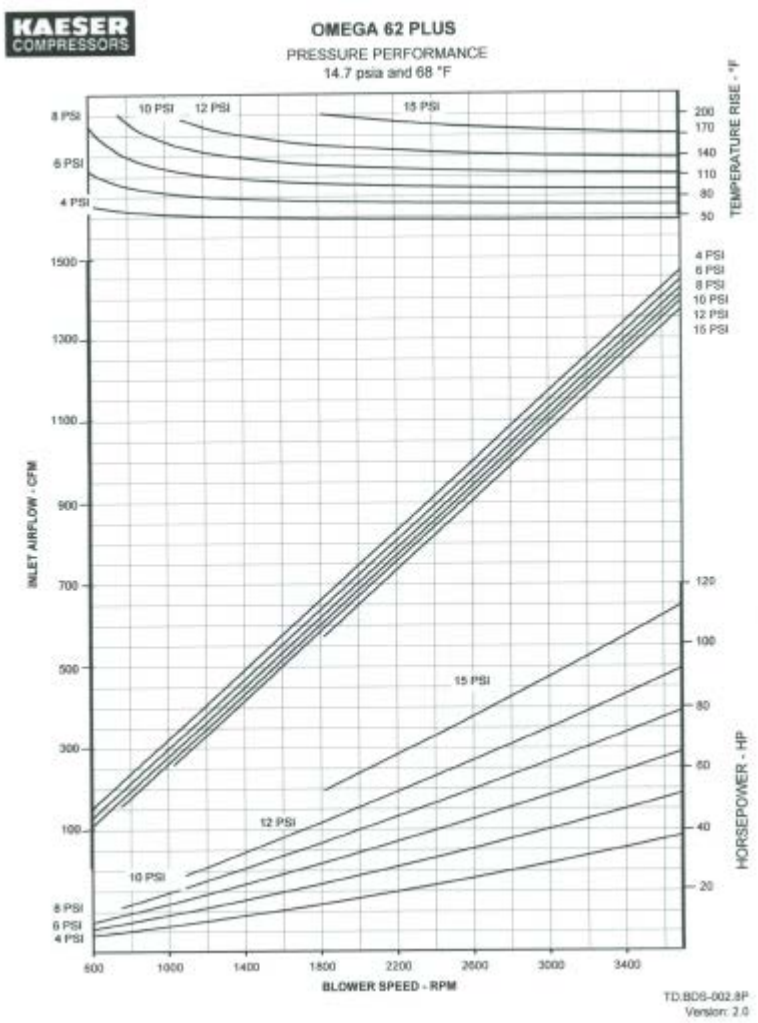
SUBPART C – PIPE DESIGN						
49.	480-93-180 (1)	Nominal wall thickness (t) for steel pipe. 192.109 (a) & (b) (a) If the nominal wt is not known….. Determined by measuring the thickness of each piece of pipe at quarter points on one end unless….. (b) If the pipe is of uniform grade, size, and thickness and more than 10 lengths of pipeline, only 10 percent of the individual lengths, but not less than 10 lengths, need be measured. The thickness of the lengths that are not measured must be verified by applying a gauge set to the minimum thickness found by the measurement. The nominal wall thickness to be used in the design formula in §192.105 is the next wall thickness found in commercial specifications that is below the average of all the measurements taken. However, the nominal wall thickness used may not be more than 1.14 times the smallest measurement taken on pipe less than 20 inches (508 millimeters) in outside diameter, nor more than 1.11 times the smallest measurement taken on pipe 20 inches (508 millimeters) or more in outside diameter.			X	
50.		Design factor (F) for steel pipe. 192.111				
51.		(a) Except as otherwise provided in paragraphs (b), (c), and (d) of this section, the design factor to be used in the design formula in §192.105 is determined in accordance with the following Class location Design factor (F) table. Class 1 **0.72**, Class 2 **0.60**, Class 3 **0.50**, Class 4 **0.40**			X	
52.		(b) A design factor of 0.60 or less must be used in the design formula in §192.105 for steel pipe in Class 1 locations that: (1) Crosses the right-of-way of an unimproved public road, without a casing; (2) Crosses without a casing, or makes a parallel encroachment on, the right-of-way of either a hard surfaced road, a highway, a public street, or a railroad; (3) Is supported by a vehicular, pedestrian, railroad, or pipeline bridge; or (4) Is used in a fabricated assembly, (including separators, mainline valve assemblies, cross-connections, and river crossing headers) or is used within five pipe diameters in any direction from the last fitting of a fabricated assembly, other than a transition piece or an elbow used in place of a pipe bend which is not associated with a fabricated assembly.			X	
53.		(c) For Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for uncased steel pipe that crosses the right-of-way of a hard surfaced road, a highway, a public street, or a railroad.			X	
54.		(d) For Class 1 and Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for- (1) Steel pipe in a compressor station, regulating station, or measuring station, and (2) Steel pipe, including a pipe riser, on a platform located offshore or in inland navigable waters.			X	
55.		Longitudinal joint factor (E) for steel pipe. 192.113			X	
56.	480-93-180 (1)	Temperature derating factor (T) for steel pipe. 192.115			X	
		For Plastic Pipe				

SUBPART C – PIPE DESIGN						
57.	480-93-180 (1)	Subject to the limitations of §192.123, for determining the design pressure for plastic pipe in accordance with either formula listed. 192.121 *****Notes – This is contained in Appendix D Section 3.1 Pipe Data** **The Simplot Biogas Pipeline is comprised of 8 inch diameter SDR-11 HDPE pipe.** **3.2 Calculations, Maximum Operating Pressure** **HDB (S) = 800 psi** **Standard dimension ratio (SDR) = 11** **Design Pressure = (0.32)(2S)/(SDR-1)** **= (0.32)(2*800)/(11-1)** **= 51 PSIG*****	X			
58.		For assuring that the design limitations for plastic pipe are not exceeded. 192.123 (a) thru (e) *****Notes – OPP is referenced in Design and Construction Section 11.2.5 Additionally, attached is the compressor curve demonstrating the MAOP cannot be exceeded. *****  	X			

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Comments:

*****Notes #46-56 N/A This is a PE system*****

		SUBPART D – DESIGN OF PIPELINE COMPONENTS	S	U	N/A	N/C
		For the design and installation of pipeline components and facilities, and relating to protection against accidental over-pressuring. 192.141				
59.	480-93-180 (1)	General requirements.… 192.143 *****Notes – PnP Manual Section 11 Design and Construction.*****	X			
60.		Qualifying metallic components. 192.144 (a) & (b) *****Notes – No components or facilities in this system*****			X	
61.		For steel valves; meeting the minimum requirements of API 6D, or other standard that provides an equivalent performance level. 192.145 (a) thru (e) *****Notes – No components or facilities in this system*****			X	
62.		For each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B16.5, MSS SP-44, or the equivalent. 192.147 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
63.		For ensuring that each new transmission line and each replacement of line pipe, valve, fitting, or other line component in a transmission line is designed and constructed to accommodate the passage of instrumented internal inspection devices. 192.150 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
64.		Components fabricated by welding. 192.153 (a) thru (d) *****Notes – No components or facilities in this system*****			X	
65.		Welded branch connections. 192.155 *****Notes – No components or facilities in this system*****			X	
66.		Flexibility. 192.159 *****Notes – No components or facilities in this system*****			X	
67.		Supports and Anchors 192.161(a) (a) thru (f) *****Notes – No components or facilities in this system*****			X	
		Compressor Stations				
68.	480-93-180 (1)	Compressor stations: Design and construction. 192.163 (a) thru (e) *****Notes – No components or facilities in this system*****			X	
69.		Compressor stations: Liquid removal. 192.165 (a) & (b) *****Notes – No components or facilities in this system*****			X	
70.		Compressor stations: Emergency shutdown. 192.167 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
71.	480-93-180 (1)	Compressor stations: Pressure limiting devices. 192.169 (a) & (b) *****Notes – No components or facilities in this system*****			X	
72.		Compressor stations: Additional safety equipment. 192.171 (a) thru (e) *****Notes – No components or facilities in this system*****			X	
73.		Compressor stations: Ventilation. 192.173 *****Notes – No components or facilities in this system*****			X	

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		SUBPART D – DESIGN OF PIPELINE COMPONENTS	S	U	N/A	N/C
74.		Pipe-type and bottle-type holders. 192.175 *****Notes – No components or facilities in this system*****			X	
75.		Additional provisions for bottle-type holders. 192.177 *****Notes – No components or facilities in this system*****			X	
76.	480-93-180 (1)	Transmission line valves.192.179 (a) thru (d) *****Notes – PnP Manual 11.2.4*****	X			
77.		Distribution line valves. 192.181(a) thru (c) *****Notes – No components or facilities in this system*****			X	
78.	480-93-180 (1)	Vaults: Structural design requirements 192.183 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
79.		Vaults: Accessibility 192.185 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
80.		Vaults: Sealing, venting, and ventilation. 192.187 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
81.		Vaults: Drainage and waterproofing 192.189 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
82.		Design pressure of plastic fittings 192.191 (a) & (b) *****Notes – PnP Manual 11.2.2*****	X			
83.		Valve installation in plastic pipe. 192.193 *****Notes – PnP Manual 9.2.8.1 Both are steel*****	X			
84.		Protection against accidental over-pressuring 192.195 (a) & (b) *****Notes – OPP is referenced in Design and Construction Section 11.2.5 Additionally, The compressor curve demonstrates the MAOP cannot be exceeded. *****	X			
85.	480-93-180 (1)	Control of the pressure of gas delivered from high-pressure distribution systems. 192.197 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
86.		Except for rupture discs, each pressure relief or pressure limiting device must: 192.199 (a) thru (h) *****Notes – No components or facilities in this system*****			X	
87.		Required capacity of pressure relieving and limiting stations. 192.201(c) *****Notes – No components or facilities in this system*****			X	
88.		Instrument, Control, and Sampling Pipe and Components 192.203(a) & (b) *****Notes – No components or facilities in this system*****			X	

Comments:

		SUBPART E – WELDING OF STEEL IN PIPELINES WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION	S	U	N/A	N/C
89.	480-93-180(1)	Welding procedures must be qualified under **Section 5 of API 1104** or **Section IX of ASME Boiler and Pressure Code** (2001 ed.) by destructive test. Amdt. 192-103 pub 06/09/06, eff. 07/10/06. .225(a) *****Notes – No components or facilities in this system*****			X	
90.		Retention of welding procedure – details and test .225(b) *****Notes – No components or facilities in this system*****			X	
91.		Welders must be qualified by **Section 6 of API 1104 (20th edition 2007, including errata 2008)** or **Section IX of the ASME Boiler and Pressure Vessel Code** (**2007 edition, July 1, 2007**), except that a welder qualified under an earlier edition than currently listed in **192.7** may weld, but may not requalify under that earlier edition. (Amdt 192-114 Pub. 8/11/10 eff. 10/01/10). *****Notes – No components or facilities in this system*****			X	
92.		Welders may be qualified under **section I of Appendix C** to weld on lines that operate at < **20% SMYS.** .227(b) *****Notes – No components or facilities in this system*****			X	
		Oxyacetylene welders may qualify under 49 CFR § 192 Appendix C, but may only weld the	**S**	**U**	**N/A**	**N/C**

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		following size pipe: 480-93-080(1)(a)				
93.	480-93-180 (1)	• Nominal **two-inch** or smaller branch connections to nominal **six-inch** or smaller main or service pipe. 480-93-080(1)(a)(i)			X	
94.		• Nominal **two-inch** or smaller below ground butt welds 480-93-080(1)(a)(ii)			X	
95.		• Nominal **four-inch** or smaller above ground manifold and meter piping operating at 10 psig or less. 480-93-080(1)(a)(iii)			X	
96.	480-93-180(1)	• Appendix C Welders re-qualified **2/Yr (7.5Months)** 480-93-080(1)(a)(iv)			X	
97.		Use of testing equipment to record and document essential variables 480-93-080(1)(b) (eff 6/02/05)			X	
98.		Qualified written welding procedures must be located on-site where welding is being performed 480-93-080(1)(d)			X	
99.		Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. 480-93-080(3) (eff 6/02/05)			X	
100.	480-93-180(1)	To weld on compressor station piping and components, a welder must successfully complete a destructive test .229(a)			X	
101.		Welder must have used welding process within the preceding **6 months** .229(b)			X	
102.		A welder qualified under .227(a)… .229(c)				
103.		• May not weld on pipe that operates at ≥ 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the **sections 6 or 9 of API Standard 1104**; may maintain an ongoing qualification status by performing welds tested and found acceptable at least **twice per year**, not exceeding **7½ months**; may not requalify under an earlier referenced edition. .229(c)(1)			X	
104.		• May not weld on pipe that operates at < 20% SMYS unless is tested in accordance with .229(c)(1) or re-qualifies under .229(d)(1) or (d)(2). .229(c)(2)			X	
		Welders qualified under .227(b) may not weld unless: .229(d)	**S**	**U**	**N/A**	**N/C**
105.	480-93-180(1)	• Re-qualified within **1 year/15 months**, or .229(d)(1)			X	
106.		• Within **7½ months** but at least **twice per year** had a production weld pass a qualifying test .229(d)(2)			X	
107.		Welding operation must be protected from weather .231			X	
108.		Miter joints (**consider pipe alignment**) .233			X	
109.		Welding preparation and joint alignment .235			X	
110.		Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure: .241(a) thru (c)			X	
111.		Nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld .243 (a) thru (f)			X	
112.		Repair or removal of defects.245 (a) thru (c)			X	
		• Sleeve Repair – low hydrogen rod (**Best Practices –ref. API 1104 App. B, In Service Welding**)				

Comments:

*****Notes –#93-112 No welders, components, or facilities in this system.*****

SUBPART F - JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION			**S**	**U**	**N/A**	**N/C**
113.		Joining of plastic pipe .281				
114.		A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint. 281(a) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			

115.		Each solvent cement joint on plastic pipe must comply with the following: .281(b)	X			
116.		• The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint. .281(b)(1) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
117.		• The solvent cement must conform to ASTM Designation: D 2513. .281(b)(2) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
118.		• The joint may not be heated to accelerate the setting of the cement. .281(b)(3) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
119.	480-93-180(1)	Each heat-fusion joint on plastic pipe must comply with the following: .281(c)				
120.		• A butt heat-fusion joint must be joined by a device that holds the heater element square to the ends of the piping, compresses the heated ends together, and holds the pipe in proper alignment while the plastic hardens. .281(c)(1) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
121.		• A socket heat-fusion joint must be joined by a device that heats the mating surfaces of the joint uniformly and simultaneously to essentially the same temperature. .281(c)(2) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
122.		• An electrofusion joint must be joined utilizing the equipment and techniques of the fittings manufacturer or equipment and techniques shown, by testing joints to the requirements of §192.283(a)(1)(iii), to be at least equivalent to those of the fittings manufacturer. .281(c)(3) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
123.		• Heat may not be applied with a torch or other open flame. .281(c)(4) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
124.		Each adhesive joint on plastic pipe must comply with the following: .281(d)				
125.		• The adhesive must conform to ASTM Designation: D 2517. .281(d)(1) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
126.		• The materials and adhesive must be compatible with each other. .281(d)(1) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
127.		Each compression type mechanical joint on plastic pipe must comply with the following: .281(e)				
128.		• The gasket material in the coupling must be compatible with the plastic. .281(e)(1) *****Notes – PnP Manual Form 11.5.1 Joining on the Simplot Pipeline will be accomplished by third party contractors in accordance with §192.281 *****	X			
129.		• A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling. .281(e)(2)	X			
130.		Before any written procedure established under §192.273(b) is used for making plastic pipe joints by a heat fusion, solvent cement, or adhesive method, the procedure must be qualified by subjecting specimen joints made according to the procedure to the following tests: .283(a)				
131.		The burst test requirements of– .283(a)(1)				
132.		• Thermoplastic pipe: paragraph 6.6 (sustained pressure test) or paragraph 6.7 (Minimum Hydrostatic Burst Test) or paragraph 8.9 (Sustained Static pressure Test) of ASTM D2513 .283(a)(1)(i) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
133.	480-93-180(1)	• Thermosetting plastic pipe: paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517; or .283(a)(1)(ii) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			

134.		• Electrofusion fittings for polyethylene pipe and tubing: paragraph 9.1 (Minimum Hydraulic Burst Pressure Test), paragraph 9.2 (Sustained Pressure Test), paragraph 9.3 (Tensile Strength Test), or paragraph 9.4 (Joint Integrity Tests) of ASTM Designation F1055. .283(a)(1)(iii) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
135.		For procedures intended for lateral pipe connections, subject a specimen joint made from pipe sections joined at right angles according to the procedure to a force on the lateral pipe until failure occurs in the specimen. If failure initiates outside the joint area, the procedure qualifies for use; and, .283(a)(2) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
136.	480-93-180(1)	For procedures intended for non-lateral pipe connections, follow the tensile test requirements of ASTM D638, except that the test may be conducted at ambient temperature and humidity If the specimen elongates no less than 25 percent or failure initiates outside the joint area, the procedure qualifies for use. .283(a)(3) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
137.		Before any written procedure established under §192.273(b) is used for making mechanical plastic pipe joints that are designed to withstand tensile forces, the procedure must be qualified by subjecting five specimen joints made according to the procedure to the following tensile test: .283(b)				
138.		• Use an apparatus for the test as specified in ASTM D 638 (except for conditioning). .283(b)(1) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
139.		• The specimen must be of such length that the distance between the grips of the apparatus and the end of the stiffener does not affect the joint strength. .283(b)(2) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
140.		• The speed of testing is 0.20 in. (5.0 mm) per minute, plus or minus 25 percent. .283(b)(3) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
141.		• Pipe specimens less than 4 inches (102 mm) in diameter are qualified if the pipe yields to an elongation of no less than 25 percent or failure initiates outside the joint area. .283(b)(4) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
142.		• Pipe specimens 4 inches (102 mm) and larger in diameter shall be pulled until the pipe is subjected to a tensile stress equal to or greater than the maximum thermal stress that would be produced by a temperature change of 100° F (38° C) or until the pipe is pulled from the fitting. If the pipe pulls from the fitting, the lowest value of the five test results or the manufacturer's rating, whichever is lower must be used in the design calculations for stress. .283(b)(5) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
143.		• Each specimen that fails at the grips must be retested using new pipe. .283(b)(6) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
144.		• Results pertain only to the specific outside diameter, and material of the pipe tested, except that testing of a heavier wall pipe may be used to qualify pipe of the same material but with a lesser wall thickness. .283(b)(7) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
145.		A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints. .283(c) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
146.		Pipe or fittings manufactured before July 1, 1980, may be used in accordance with procedures that the manufacturer certifies will produce a joint as strong as the pipe. .283(d) *****Notes – PnP Manual Form 11.5.2 All joining activities will use procedures qualified to §192.283*****	X			
147.		No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by: .285(a)				

148.	480-93-180(1)	• Appropriate training or experience in the use of the procedure; and .285(a)(1) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
149.		• Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section. .285(a)(2) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
150.		The specimen joint must be: .285(b)				
151.		• Visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure; and .285(b)(1) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
152.	480-93-180(1)	• In the case of a heat fusion, solvent cement, or adhesive joint; .285(b)(2) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
153.		Tested under any one of the test methods listed under §192.283(a) applicable to the type of joint and material being tested; .285(b)(2)(i) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
154.		Examined by ultrasonic inspection and found not to contain flaws that may cause failure; or .285(b)(2)(ii) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
155.		Cut into at least three longitudinal straps, each of which is: .285(b)(2)(iii) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
156.		Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and .285(b)(2)(iii)(A) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
157.		Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area. .285(b)(2)(iii)(B) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
158.		A person must be requalified under an applicable procedure, if during any 12-month period that person: .285(c) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****				
159.	480-93-180(1)	• Does not make any joints under that procedure; or .285(c)(1) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
160.		• Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513. .285(c)(2) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
161.		Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section. .285(d) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
		Plastic pipe joiners re-qualified **1/Yr (15 Months)** 480-93-080 (2)				
162.	480-93-180(1)	• Qualified written plastic joining procedures must be located on-site where plastic joining is being performed. 480-93-080(2)(a) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)*****	X			
163.		• Plastic pipe joiners re-qualified if no production joints made during any 12 month period 480-93-080(2)(b) (eff 6/02/05) *****Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-**	X			

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		080(a)(b)(c)***				
164.		• Tracking production joints or re-qualify joiners **1/Yr (12Months)** 480-93-080(2)(c) (eff 6/02/05) ***Notes – PnP Manual Form 11.5.3 All joining activities will use procedures qualified to §192.285 and WAC 480-93-080(a)(b)(c)***	X			
165.	480-93-180(1) / 192.273(b)	No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure. .287 ***Notes – PnP Manual Form 11.5.4 All joining inspectors qualified to §192.287***	X			

Comments:

SUBPART G – CONSTRUCTION REQUIREMENTS for TRANSMISSION LINES and MAINS			**S**	**U**	**N/A**	**N/C**
166.	480-93-180(1)	Compliance with specifications or standards. 192.303***Notes – PnP Manual Form 11.1 Subpart D***	X			
167.		Inspection of each transmission line and main during construction 192.305***Notes – PnP Manual Form 11.4.2***	X			
168.		Inspection of materials 192.307 ***Notes – PnP Manual Form 11.4.2***	X			
169.		Repair of steel pipe 192.309 (a) thru (e) ***Notes – No components or facilities in this system***			X	
170.		Repair of plastic pipe. 192.311 ***Notes – PnP Manual Form 10.4 and 10.5***	X			
171.		Bends and elbows. 192.313 (a) thru (c) ***Notes – No components or facilities in this system***			X	
172.		Wrinkle bends in steel pipe. 192.315 (a) & (b) ***Notes – No components or facilities in this system***			X	
173.		Protection from hazards 192.317 (a) thru (c) ***Notes – PnP Manual Form 11.4.3***	X			
174.		Installation of Pipe in a ditch 192.319 (a) thru (c)) ***Notes – PE Pipe***			X	
175.		Installation of plastic pipe. 192.321 (a) thru (h) ***Notes – PnP Manual Form 11.4.4***	X			
480-93-178 WAC PROTECTION OF PLASTIC PIPE			**S**	**U**	**N/A**	**N/C**
176.	480-93-180(1)	Procedures for the storage, handling, and installation of plastic pipelines in accordance with the latest applicable manufacturer's recommended practices. 480-93-178(1)) ***Notes – PnP Manual Form 11.4.6***	X			
177.		Stated acceptable time limit for maximum cumulative ultraviolet light exposure 480-93-178 (2) ***Notes – PnP Manual Section 11.4.6***	X			
178.		Separation requirements when installing plastic pipelines parallel to other underground utilities 480-93-178 (4) ***Notes – PnP Manual Form 11.2.7***	X			
179.		Separation requirements when installing plastic pipelines perpendicular to other underground utilities 480-93-178 (5) ***Notes – PnP Manual Form 11.2.7***	X			
180.		Casings 192.323 (a) thru (d) ***Notes – PnP Manual Form 11.5***	X			
181.		Casing of pipelines. 480-93-115 (1) thru (4) ***Notes – PnP Manual Form 11.5***	X			
182.		Underground clearance. 192.325 (a) thru (d). ***Notes – PnP Manual Form 11.2.7***	X			
183.		Cover. 192.327 (a) thru (g) ***Notes – PnP Manual Form 11.4.6***	X			

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SUBPART H - CUSTOMER METERS, SERVICE REGULATORS, and SERVICE LINES						
			S	**U**	**N/A**	**N/C**
184.	480-93-180 (1)	Meters and service regulators installed at locations as prescribed under 192.353 (a) thru (d) *****Notes – No components or facilities in this system*****			X	
185.		Service regulator vents and relief vents installed and protected from damage. Vaults housing meters and regulators protected from loading due to vehicular traffic. 192.355 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
186.	480-93-180 (1)	Meters and regulators installed to minimize stresses and insure that potential releases vent to outside atmosphere. 192.357 (a) thru (d) *****Notes – No components or facilities in this system*****			X	
480-93-140 WAC SERVICE REGULATORS			**S**	**U**	**N/A**	**N/C**
187.	480-93-180 (1)	Procedures for installing, operating, and maintaining service regulators in accordance with federal and state regulations, and manufacturer's recommended installation and maintenance practices. 480-93-140(1) *****Notes – No components or facilities in this system*****			X	
188.		Procedures for inspecting and testing service regulators and associated safety devices during the initial turn-on, and when a customer experiences a pressure problem. Testing must include….. 480-93-140(2) *****Notes – No components or facilities in this system*****			X	
189.	480-93-180 (1)	Minimum service line installation requirements as prescribed under 192.361 (a) thru (g) *****Notes – No components or facilities in this system*****			X	
190.		Location of service-line valves as prescribed under 192.365 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
191.		General requirements for locations of service-line connections to mains and use of compression fittings 192.367 (a) thru (b)(2) *****Notes – No components or facilities in this system*****			X	
192.		Connections of service lines to cast iron or ductile iron mains. 192.369 (a) thru (b) *****Notes – No components or facilities in this system*****			X	
193.		Provisions for new service lines not in use 192.379 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
194.		EFV performance requirements §192.381 (a) thru (e) *****Notes – No components or facilities in this system*****			X	
195.		Excess flow valves, does the program must meet the requirements outlined in §192.38? *****Notes – No components or facilities in this system*****			X	
196.		Customer notification in accordance with §192.383. *****Notes – No components or facilities in this system*****			X	

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	SUBPART I - CORROSION CONTROL		S	U	N/A	N/C
197.	480-93-180(1)	Corrosion procedures established for the Design, Operations, Installation & Maintenance of CP systems, carried out by, or under the direction of, a person qualified in pipeline corrosion control methods .453			X	
198.	480-93-180(1)	Written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. 480-93-110(4)			X	
199.		Recording the condition of all underground metallic facilities each time the facilities are exposed. 480-93-110(6)			X	
200.		CP test reading on all exposed facilities where coating has been removed 480-93-110(8) (eff 6/02/05)			X	
201.		Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) 480-93-110(2)			X	
202.		Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas (**1 per 3 years/39 months**) .465(e)			X	
203.		Written program to monitor for indications of internal corrosion. The program must also have remedial action requirements for areas where internal corrosion is detected. 480-93-110(7) (eff 6/02/05)			X	
204.		Written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action. 480-93-110(9) (eff 6/02/05)			X	
205.		Remedial measures (cast iron and ductile iron pipelines) .489			X	
206.		Records retained for <u>each</u> cathodic protection test, survey, or inspection required by 49 CFR Subpart I, and chapter 480-93 WAC. 480-93-110			X	
	WAC 480-93-110 Corrosion Requirements		**S**	**U**	**N/A**	**N/C**
207.	480-93-180(1)	Casings inspected/tested annually not to exceed **fifteen months** 480-93-110(5)			X	
208.		Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods 480-93-110(5)(a)			X	
209.		Possible shorted conditions – Perform confirmatory follow-up inspection within **90** days 480-93-110(5)(b)			X	
210.		Casing shorts cleared when practical 480-93-110(5)(c)			X	
211.	480-93-180(1)	Shorted conditions leak surveyed within 90 days of discovery. **Twice annually/7.5 months** 480-93-110(5)(d)			X	
212.		CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched) 480-93-110(3)			X	

Comments:

*****Notes –#197-212 No components or facilities in this system*****

	SUBPART J – TEST REQUIREMENTS		S	U	N/A	N/C
213.	480-93-180(1)	Procedures to ensure that the provisions found under 192.503(a) thru (d) for new segments of pipeline, or Return to Service segments of pipeline which have been relocated or replaced are met. *****Notes – PnP Manual Form 11.6*****	X			
214.		Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS. 192.505 (a) thru (e) *****Notes – No components or facilities in this system*****			X	
215.		Test requirements for pipelines to operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig. 192.507 (a) thru (c) *****Notes – No components or facilities in this system*****			X	
216.		Test requirements for pipelines to operate below 100 psig. 192.509 (a) & (b) *****Notes – PnP**	X			

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		Manual Form 11.6* **				
217.		Test requirements for service lines. 192.511 (a) thru (c) ***Notes – No components or facilities in this system***			X	
218.		Test requirements for plastic pipelines. 192.513 (a) thru (d) ***Notes – PnP Manual Form 11.6***	X			
219.		Environmental protection and safety requirements. 192.515 (a) & (b) ***Notes – PnP Manual Form 11.6.5***	X			
220.		Records 192.517 Refer also to 480-93-170 (7) (a-h) below. ***Notes – PnP Manual Form 11.6.7***	X			

Comments:

WAC 480-93-170 PRESSURE TEST PROCEDURES			**S**	**U**	**N/A**	**N/C**
221.	480-93-180(1)	Notification in writing, to the commission, at least two business days prior to any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the SMYS 480-93-170(1) ***Notes – No components or facilities in this system***			X	
222.		• In Class 3 or Class 4 locations, as defined in 49 CFR § 192.5, or within one hundred yards of a building, must be at least eight hours in duration. 480-93-170(1)(a) ***Notes – No components or facilities in this system in Class 3 or 4***			X	
223.		• When the test medium is to be a gas or compressible fluid, each operator must notify the appropriate public officials so that adequate public protection can be provided for during the test. 480-93-170(1)(b) ***Notes – PnP Manual Form 11.6.1***	X			
224.		• In an emergency situation where it is necessary to maintain continuity of service, the requirements of subsection (1) of this section and subsection (1)(a) may be waived by notifying the commission by telephone prior to performing the test. 480-93-170(1)(c) ***Notes – PnP Manual Form 11.6.3***	X			
225.		Minimum test pressure for any steel service line or main, must be determined by multiplying the intended MAOP by a factor determined in accordance with the table located in 49 CFR § 192.619 (a)(2)(ii). 480-93-170(2) ***Notes – No components or facilities in this system***			X	
226.	480-93-180(1)	Re-testing of service lines broken, pulled, or damaged, resulting in the interruption of gas supply to the customer, must be pressure tested from the point of damage to the service termination valve prior to being placed back into service. 480-93-170(4) ***Notes – No components or facilities in this system***			X	
227.		Maintain records of all pressure tests performed for the life of the pipeline and document information as listed under 480-93-170(7) (a-h). ***Notes – PnP Manual Form 11.6.7***	X			
228.		Maintain records of each test where multiple pressure tests are performed on a single installation. 480-93-170(9) ***Notes – PnP Manual Form 11.6.7***	X			
229.		Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations.480-93-170(10) ***Notes – PnP Manual Form 11.6.4***	X			
230.		• When there are no manufacturer's recommendations, then tested at an appropriate schedule determined by the operator. ***Notes – PnP Manual Form 11.6.4***	X			
231.		• Test equipment must be tagged with the calibration or accuracy check expiration date. ***Notes – PnP Manual Form 11.6.4***	X			

Comments:

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SUBPART K - UPRATING						
		Provisions for meeting the minimum requirements for increasing maximum allowable operating pressure (uprating) for pipelines.	**S**	**U**	**N/A**	**N/C**
232.	480-93-180(1)	General requirements. 192.553 (a) thru (d)			X	
233.		Uprating to a pressure that will produce a hoop stress of **30 % or more** of SMYS in steel pipelines. 192.555 (a) thru (e)			X	
234.		Uprating: Steel pipelines to a pressure that will produce a hoop stress **less than 30 %** of SMYS: (plastic, iron, and ductile iron pipelines.) 192.557 (a) thru (d)			X	
WAC 480-93-155 - UPRATING						
235.	480-93-180(1)	Notification of uprate and submission of written plan 480-93-155 (1)			X	
236.		Content of written plan… 480-93-155 (1) (a) thru (j)			X	
237.		Uprates must be based on a previous or current pressure test that will substantiate the intended MAOP. 480-93-155 (2)			X	

Comments:

*****Notes – #232-237 Uprates are not performed on this system or planned. *****

SUBPART L - OPERATIONS			**S**	**U**	**N/A**	**N/C**
238.	480-93-180(1) / 192.605(a)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) 192.605(a) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09*****Notes – PnP Manual Form 1.13.1*****	X			
239.		Availability of construction records, maps, operating history to operating personnel 192.605(b)(3) *****Notes – PnP Manual Section 1.12 *****	X			

Comments:

SUBPART – L DAMAGE PREVENTION PROGRAM PROCEDURES			**S**	**U**	**N/A**	**N/C**
240.		**Damage Prevention (Operator Internal Performance Measures)**	**S**	**U**	**N/A**	**N/C**
241.		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, Best Practice 4-18.			X	

		Recommended only, not required) ***Notes – The operator does not use locate contractors***				
242.		Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? ***Notes – The operator does not use locate contractors***			X	
243.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? ***Notes – The operator does not use locate contractors***			X	
244.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? ***Notes - Simplot is changing over to EWN from MEA***	X			
245.		Review operator locating and excavation procedures for compliance with state law and regulations. ***Notes – PnP Manual Form P-1 and P-2***	X			
246.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ***Notes – This is a procedure review. Please review the response in the Field and Records Review inspection ***	X			
247.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? ***Notes – This is a procedure review. Please review the response in the Field and Records Review inspection ***	X			
248.		**Informational purposes only. Not Required.** Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do **Y** X **N** ***Simplot would need to set up an account in DIRT if they had a damage***			X	
249.		**PHMSA Areas of Emphasis:** • Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? ***Notes – Operator does not perform HDD***			X	
250.		• Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? ***Notes – No instances have occurred. ***			X	

Comments:

One call locates are done by Andy Erickson, Lance Carter, or an operator.

SUBPART – L FAILURE INVESTIGATION PROCEDURES			S	U	N/A	N/C
251.	480-93-180(1) / 192.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617***Notes – This is in the PnP Section 8.8 ***	X			

Comments:

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		WAC 480-93-015 ODORIZATION PROCEDURES	S	U	N/A	N/C
252.		Use of odorant testing instrumentation/Monthly testing interval 480-93-015 (2)			X	
253.		Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) 480-93-015 (3)			X	
254.	480-93-180(1)	Records maintained for usage, odorant tests performed and equipment calibration (**5yrs**) 480-93-015(4)			X	

Comments:

*****Notes – The line is not tested for odorant due to high levels of H2S in the line naturally odorizing it and making it unsafe to perform sniff tests. Please review the 6/27/2017 inspection for PHMSA interpretation and the UTC's acceptance of Simplot's response.**

		SUBPART – L PIPELINE PURGING PROCEDURES	S	U	N/A	N/C
255.	480-93-180(1)	(a) Lines containing **air** must be properly purged. *****Notes – This is in the PnP Section 6.5 *****	X			
256.	480-93-180(1)	(b) Lines containing **gas** must be properly purged *****Notes – This is in the PnP Section 6.5 *****	X			

Comments:

	CONTROL ROOM MANAGEMENT PROCEDURES (Amdt. 192-112, 74 FR 63310, December 3, 2009, eff. 2/1/2010)	S	U	N/A	N/C
*					

		WAC 480-93-185 GAS LEAK INVESTIGATION	S	U	N/A	N/C
		Procedures for the prompt investigation of any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities.				
257.	480-93-180(1)	• received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public 480-93-185(1) *****Notes – This is in the EPM Section 5 *****	X			
258.	480-93-180(1)	• Grade leak in accordance with WAC 480-93-186, and take appropriate action 480-93-185(1) *****Notes – This is in the PnP Section 3.7 – no grading – pipeline removed from service until the leak is repaired. *****			X	
259.	480-93-180(1)	• retain the leak investigation record for the life of the pipeline. 480-93-185(1) ********Notes – This is in the PnP Section 1.11.3c********	X			
260.	480-93-180(1)	Prevent removal of any suspected gas facility until the commission or the lead investigative authority has designated the release of the gas facility and keep the facility intact until directed by the lead investigative authority 480-93-185(2) *****Notes – This is in the PnP Section 8.8 header *****	X			
261.	480-93-180(1)	Taking appropriate action when leak indications originating from a foreign source. Notification requirements. 480-93-185(3) *****Notes – This is in the PnP Section 3.10 header *****	X			

		WAC 480-93-186 LEAK EVALUATION	S	U	N/A	N/C
262.	480-93-180(1)	Grade leaks as defined in WAC 480-93-18601 to establish the leak repair priority. 480-93-186(1) *****Notes – This is in the PnP Section 3.7 *****	X			

263.	480-93-180(1)	Procedure for evaluating the concentration and extent of gas leakage 480-93-186(2) **Note:** Including third-party damage where there is a possibility of multiple leaks and underground migration into nearby buildings. *****Notes – This is in the PnP Section Proc P-8 Section 7 *****	X			
264.	480-93-180(1)	Use of a combustible gas indicator to check the perimeter of a leak area. Follow-up inspection on repaired leaks no later than thirty days following repair. 480-93-186(3) *****Notes – This is in the PnP Section Proc P-8 Section 7 *****	X			
265.	480-93-180(1)	Grade 1 and 2 leaks downgraded once to Grade 3 leak without a physical repair. After downgrade, repair must be made not to exceed twenty-one months 480-93-186(4) *****Notes – This is in the PnP Section 3.7 *****			X	

Comments:

WAC 480-93-187 GAS LEAK RECORDS			**S**	**U**	**N/A**	**N/C**
		Gas leak records must contain, at a minimum, the criteria outlined in 480-93-187 (1-13)				
266.	480-93-180(1)	1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the employee(s) conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron); (8) Pipe condition; (9) Type of repair; (10) Leak cause; (11) Date pipe installed (if known); (12) Magnitude and location of CGI readings left; and (13) Unique identification numbers (such as serial numbers) of leak detection equipment. *****Notes – This is in the PnP O&M Proc F-14 *****	X			

Comments:

WAC 480-93-188 GAS LEAK SURVEYS			**S**	**U**	**N/A**	**N/C**
267.	480-93-180(1)	gas leak surveys using a gas detection instrument covering areas listed in 480-93-188(1)(a-e) *****Notes – This is in the PnP Section Proc P-8 Section 6 *****	X			
268.		Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) 480-93-188(2) *****Notes – This is in the PnP Section Proc P-8 Section 5 *****	X			

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269.		Surveys conducted according to the minimum frequencies outlined under 480-93-188(3)(a-d) *****Notes – This is in the PnP Section Section 3.8 The manual has 2x/year.*****	X			
270.		Surveys conducted under the following circumstances outlined under 480-93-188(4)(a-e) *****Notes – This is in the PnP Section 3.8.2 *****	X			
271.		Survey records must be kept for a minimum of five years and contain information required under 480-93-188(5)(a-f) *****Notes - This is in the PnP Section 1.11.3 (kept for life) *****	X			
272.		Self audits as necessary, but not to exceed three years between audits and meet the criteria outlined under 480-93-188(6)(a-e) ******Notes – Cosentino and now The Compliance Group will continue perform leak surveys and add this to a procedure in Section 3.8 .******	X			

Comments:

SUBPART - M VALVE AND VAULT MAINTENANCE PROCEDURES			**S**	**U**	**N/A**	**N/C**
		Service Valves	**S**	**U**	**N/A**	**N/C**
273.	480-93-180(1) / 192.605 (b)	Written service valve installation and maintenance program detailing the valve selection process, inspection, maintenance, and operating procedures. Does the program consider the criteria listed under 480-93-100(2)(a-f)? *****Notes – No components or facilities in this system*****			X	
274.		Service valve maintenance **(1 per yr/15 months)** 480-93-100(3) *****Notes – No components or facilities in this system*****			X	
275.		Service valve installation and maintenance program fully implemented by 6/01/07**?** 480-93-100(6) *****Notes – No components or facilities in this system*****			X	
		Vaults				

Comments:

SUBPART N — QUALIFICATION of PIPELINE PERSONNEL			**S**	**U**	**N/A**	**N/C**
Date of last UTC staff OQ plan review						
276.	480-93-180(1)	Have "New Construction" activities been identified and included in the operator's covered task list? 480-93-013 ***Notes **This is in the OQ Section 4.2 *****	X			

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FILING REQUIREMENTS for DESIGN, SPECIFICATION, and CONSTRUCTION			S	U	N/A	N/C
277.	480-93-180(1)	Submittal of construction procedures, designs, and specifications used for each pipeline facility prior to operating the pipeline. All procedures must detail the acceptable types of materials, fittings, and components for the different types of facilities in the operator's system. 480-93-017(1) *****Notes - This is in the PnP Appendix B - N/A. This code reference is for a new operator. *****			X	
278.	480-93-180(1)	Construction plans not conforming with a gas company's existing and accepted construction procedures, designs, and specifications on file with the commission, submitted to the commission for review at least forty-five days prior to the initiation of construction activity. 480-93-017(2) *****Notes - - N/A. This code reference is for a new operator. *****			X	

MAPS, DRAWINGS, and RECORDS of GAS FACILITIES			S	U	N/A	N/C
279.	480-93-180(1)	Records updated no later then **6 months** from completion of construction activity and made available to appropriate personnel. 480-93-018(3) *****Notes - This is in the PnP Section 1.11.1e*** -**	X			

PROXIMITY CONSIDERATIONS			S	U	N/A	N/C
280.	480-93-180(1)	Each operator must submit a written request and receive commission approval prior to: Operating any gas pipeline facility at greater than five hundred psig that is within five hundred feet of any of the following places: 480-93-20 (1)(a) • A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or : 480-93-20 (1)(a)(i) • A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission; or : 480-93-20(1)(a)(ii) • A public highway, as defined in RCW 81.80.010(3). 480-93-20 (1)(a)(iii) *****Notes – This pipeline cannot be physically operated at these pressures*****			X	
281.	480-93-180(1)	Operating any gas pipeline facility at greater than two hundred fifty psig, up to and including five hundred psig, that is operated within one hundred feet of either of the following places: 480-93-20(1)(b) • A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or: 480-93-20(1)(b)(i) • A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission. 480-93-20(1)(b)(ii) For proposed new construction, document evidence to demonstrate that it is not practical to select an alternate route that will avoid areas or which demonstrates that the operator has considered future development of the area and has designed their pipeline facilities accordingly. 480-93-20(2) *****Notes – This pipeline cannot be physically operated at these pressures*****			X	

Attachment 1
Alternative Maximum Allowable Operating Pressure

For additional guidance refer to http://primis.phmsa.dot.gov/maop/faqs.htm
For FAQs refer to http://primis.phmsa.dot.gov/maop/faqs.htm

Recent PHMSA 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
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.

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