

# 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  
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

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			
<b>Inspection ID/Docket Number</b>	8025		
<b>Inspector Name &amp; Submit Date</b>	Dave Cullom and Darren Tinnerstet 5/19/2020		
<b>Sr. Eng Name &amp; Review/Date</b>	Joe Subsits, 5/20/2020		
Operator Information			
<b>Name of Operator:</b>	Inland Empire Paper Company	<b>OP ID #:</b>	8140
<b>Name of Unit(s):</b>	Headquarters		
<b>Records Location:</b>	Spokane, WA		
<b>Date(s) of Last Review:</b>	Aug. 22, 2016	<b>Inspection Date</b>	5/12/2020

<p><b>Inspection Summary:</b></p> <p>There were no probable violations or areas of concern during this inspection. IEP has updated 9 policies in the 2020 version of the Gas Operating Procedures (GOP) Manual and 6 polices in the Emergency Response Manual (ERM). No large significant changes were noted. Manual revision logs are available for the manual by contacting Kevin Davis if needed.</p>
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<b>HQ Address:</b> 3320 N. Argonne Spokane, WA 99212		<b>System/Unit Name &amp; Address:</b> 3320 N. Argonne Spokane, WA 99212	
<b>Co. Official:</b>	Kevin Rasler	<b>Phone No.:</b>	N/A
<b>Phone No.:</b>	(509) 924-1911	<b>Fax No.:</b>	N/A
<b>Fax No.:</b>		<b>Emergency Phone No.:</b>	N/A
<b>Emergency Phone No.:</b>	(509) 999-9726 (Kevin Davis)		N/A
Persons Interviewed	Title	Phone No.	
Kevin Davis	Production Manager	(509) 924-1911	
Doug Krapas	Environmental Manager	(509) 924-1911 x363	

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GAS SYSTEM OPERATIONS		
Gas Supplier Williams		
Operating Pressure(s):	MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	780	150 (confirmed during 5/12/2020 video conference)
Town:		
Other:		
Does the operator have any transmission pipelines?    Yes		

Pipe Specifications:			
Year Installed (Range)	1990	Pipe Diameters (Range)	4"
Material Type	Carbon Steel	Line Pipe Specification Used	APL 5L X42 and ASTM A106
Mileage	3.6	SMYS %	6.4

**49 CFR PART 191 & CHAPTER 480-93 WAC**

REPORTING PROCEDURES		S	U	N/A	N/C
1.	Immediate Notice of certain incidents to <b>NRC (800) 424-8802</b> , or electronically at <a href="http://www.nrc.uscg.mil/nrchnp.html">http://www.nrc.uscg.mil/nrchnp.html</a> , 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 <b>ERM Section 10.1, ERM Section 10.2(w)</b>	X			
2.	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> 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 <b>GOP Section 3.15.5 – updated email address. 7.05 in the O&amp;M also was updated</b>	X			
3.	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9144</b> (Within <b>2 hours</b> ) for events which; 480-93-200(1) <b>ERM Section 10.1.2</b>				
4.	(a) Results in a fatality or personal injury requiring hospitalization; <b>ERM Section 10.1.2</b>	X			
5.	(b) Results in damage to the property of the operator and others of a combined total exceeding fifty thousand dollars; <b>ERM Section 10.1.2</b>	X			
6.	(c) Results in the evacuation of a building, or high occupancy structures or areas <b>ERM Section 10.1.2</b>	X			
7.	(d) Results in the unintentional ignition of gas; <b>ERM Section 10.1.2</b>	X			
8.	(e) Results in the unscheduled interruption of service furnished by any operator to twenty-five or more distribution customers; <b>ERM Section 10.1.2</b>			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 <u>480-93-020</u> ; <b>ERM Section 10.1.2</b>	X			
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 <b>ERM Section 10.1.2</b>	X			
11.	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within <b>24 hours</b> ) for; 480-93-200(2) <b>ERM Section 10.1.3</b>	X			
12.	(a) The uncontrolled release of gas for more than two hours; <b>ERM Section 10.1.3</b>	X			
13.	b) The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; <b>ERM Section 10.1.3</b>	X			
14.	(c) A pipeline or system operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or <b>ERM Section 10.1.3</b>			X	

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<b>REPORTING PROCEDURES</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>15.</b>		(d) A pipeline or system pressure exceeding the MAOP. <b>ERM Section 10.1.3</b>	X			
<b>16.</b>	480-93-180 (1)	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 <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). <b>GOP Section 3.15.5 – updated email address. 7.05 in the O&amp;M also was updated</b>	X			
<b>17.</b>		Supplemental incident reports 191.15(c) <b>ERM Section 10.2.3</b>	X			
<b>18.</b>		Written incident reports <b>filed with the commission</b> (within 30 days); and include the following; 480-93-200(4) (a) thru (g) <b>ERM Section 10.1.2</b>	X			
<b>19.</b>	480-93-180 (1)	Supplemental reports <b>filed with the commission</b> 480-93-200(5) <b>ERM Section 10.2.3</b>	X			
<b>20.</b>		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) <b>GOP 7.01(g)</b>	X			
<b>21.</b>	480-93-180 (1)	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). <b>GOP Section 3.15</b>	X			
<b>22.</b>		<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission’s Virtual DIRT system or on-line damage reporting form) 480-93-200(7)				
<b>23.</b>		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) <b>GOP Section 3.15.2</b>	X			
<b>24.</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</u> facility locates first being completed? 480-93-200(7)(b) <b>ERM Section 10.2.4</b>	X			
<b>25.</b>	480-93-180 (1)	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) <b>Note:</b> Records maintained for two years and made available to the commission upon request <b>ERM Section 10.2.4</b>	X			
<b>26.</b>		Does the operator provide the following information to excavators who damage gas pipeline facilities? 480-93-200(8) <b>ERM Section 10.2.4</b>				
<b>27.</b>		<ul style="list-style-type: none"> <li>• Notification requirements for excavators under RCW 19.122.050(1) 200(8)(a)</li> </ul>	X			
<b>28.</b>		<ul style="list-style-type: none"> <li>• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 200(8)(b) <b>ERM Section 10.2.4</b></li> </ul>	X			
<b>29.</b>		<ul style="list-style-type: none"> <li>• 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) <b>ERM Section 10.2.4</b></li> </ul>	X			
<b>30.</b>		<b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b> <ul style="list-style-type: none"> <li>• 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)</li> <li>• A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) <b>ERM Section 10.2.4</b></li> </ul>	X			
		Annual Reports <b>filed with the commission</b> no later than March 15 for the proceeding calendar year 480-93-200(10)				
<b>31.</b>		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) <b>GOP Section 3.15</b>	X			
<b>32.</b>		Annual report on construction defects or material failures 480-93-200(10)(b) <b>GOP Section 3.15</b>	X			
<b>33.</b>		Providing updated emergency contact information to the Commission and appropriate officials 480-93-200(11) <b>GOP Section 4.04</b>	X			
<b>34.</b>	480-93-180 (1)	Providing daily construction and repair activities reports 480-93-200(12) <b>GOP Section 3.16</b>	X			
<b>35.</b>		Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form (when required) 480-93-200(13) <b>GOP Section 8.12</b>	X			

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REPORTING PROCEDURES			S	U	N/A	N/C
36.		Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> 191.22 ***Notes – <b>The operator has an OPID and none of the events have occurred, or are likely to occur that would require notification to PHMSA.</b> ***			X	
37.		Safety related condition reports (SRCR) 191.23 <b>GOP Section 7.01(f)</b>	X			
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) <b>Note:</b> 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 <b>on or before the fifth day</b> 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"> <li>• 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.</li> <li>• The name, job title, and business telephone number of the person who determined the condition exists.</li> <li>• The date the condition was discovered and the date the condition was first determined to exist.</li> <li>• 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.</li> </ul> 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. <b>GOP Section 7.03, 7.01d, 7.04</b>	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? <b>GOP Section 7.01 The ERM also contains abnormal operating condition and SRC recognition.</b>	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 <a href="http://www.npms.phmsa.dot.gov/submission/">http://www.npms.phmsa.dot.gov/submission/</a> 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. <b>GOP Section 3.15.4</b>	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? <b>GOP Section 3.15</b>	X			

**Comments:**

Item 8 – IEP is not a distribution system  
 Item 14 – IEP’s pipeline does not operate at low pressure  
 Items 22-29 – IEP has not had any excavators damage their pipeline  
 Item 30 – IEP is not aware of an excavator digging within thirty-five feet of their line

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<b>49 CFR PART 192 SUBPART A – GENERAL</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>CHAPTER 480-93 WAC – GAS COMPANIES---SAFETY</b>						
<b>40.</b>		Procedures for notifying new customers, within <b>90 days</b> , of their responsibility for those selections of service lines not maintained by the operator. §192.16			X	
<b>41.</b>	480-93-180 (1)	Conversion to Service - Any pipelines previously used in service not subject to Part 192? 192.14			X	

**Comments:**

Item 40 – IEP has no service lines  
Item 41 – IEP did not convert any pipelines to service

<b>SUBPART B - MATERIALS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		Are minimum requirements prescribed for the selection and qualification of pipe and components for use in pipelines 192.51				
<b>42.</b>	480-93-180 (1)	For <b>steel</b> pipe, manufactured in accordance with and meet the listed specification found under Appendix B 192.55 <b>GOP Section 6.01.1</b>	X			
		For <b>new</b> plastic pipe, qualified for use under this part if: 192.59(a)				
<b>43.</b>	480-93-180 (1)	<ul style="list-style-type: none"> <li>• It is manufactured in accordance with a listed specification; and 192.59(a)(1)</li> <li>• It is resistant to chemicals with which contact may be anticipated. 192.59(a) (2)</li> </ul>			X	
		For <b>used</b> plastic pipe, qualified for use under this part if: 192.59(b)				
<b>44.</b>	480-93-180 (1)	<ul style="list-style-type: none"> <li>• It was manufactured in accordance with a listed specification; 192.59(b)(1)</li> <li>• It is resistant to chemicals with which contact may be anticipated; 192.59(b)(2)</li> <li>• It has been used only in natural gas service. 192.59(b)(3)(4)</li> <li>• Its dimensions are still within the tolerances of the specification to which it was manufactured; and, 192.59(b)</li> <li>• It is free of visible defects. 192.59(b)(5)</li> </ul>			X	
<b>45.</b>		Marking of Materials 192.63 <b>GOP Section 6.01.6</b>	X			

**Comments:**

Items 43-44 – No plastic pipe.

<b>SUBPART C – PIPE DESIGN</b>						
		Procedures for assuring that the minimum requirements for design of pipe are met				
		<b>For Steel Pipe</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>46.</b>		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	
<b>47.</b>		Design formula for steel pipe. 192.105(a)			X	
<b>48.</b>	480-93-180 (1)	Yield strength (S) for steel pipe. 192.107			X	

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<b>SUBPART C – PIPE DESIGN</b>				
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 <b>0.72</b> , Class 2 <b>0.60</b> , Class 3 <b>0.50</b> , Class 4 <b>0.40</b>		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
<b>For Plastic Pipe</b>				
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		X
58.		For assuring that the design limitations for plastic pipe are not exceeded. 192.123 (a) thru (e)		X

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**Comments:**

Items 46-56 – IEP does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual.  
 Items 57-58 – IEP has no plastic pipe

<b>SUBPART D – DESIGN OF PIPELINE COMPONENTS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		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			X	
60.		Qualifying metallic components. 192.144 (a) & (b)			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)			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)			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) <b>GOP Section 2.11</b>	X			
64.		Components fabricated by welding. 192.153 (a) thru (d) <b>GOP Section 3.04</b>	X			
65.		Welded branch connections. 192.155			X	
66.		Flexibility. 192.159			X	
67.		Supports and Anchors 192.161(a) (a) thru (f)			X	
		<b>Compressor Stations</b>				
68.	480-93-180 (1)	Compressor stations: Design and construction. 192.163 (a) thru (e)			X	
69.		Compressor stations: Liquid removal. 192.165 (a) & (b)			X	
70.		Compressor stations: Emergency shutdown. 192.167 (a) thru (c)			X	
71.	480-93-180 (1)	Compressor stations: Pressure limiting devices. 192.169 (a) & (b)			X	
72.		Compressor stations: Additional safety equipment. 192.171 (a) thru (e)			X	
73.		Compressor stations: Ventilation. 192.173			X	
74.		Pipe-type and bottle-type holders. 192.175			X	
75.		Additional provisions for bottle-type holders. 192.177			X	
76.	480-93-180 (1)	Transmission line valves.192.179 (a) thru (d) <b>GOP Section 4.05</b>	X			
77.		Distribution line valves. 192.181(a) thru (c)			X	
78.	480-93-180 (1)	Vaults: Structural design requirements 192.183 (a) thru (c)			X	
79.		Vaults: Accessibility 192.185 (a) thru (c)			X	
80.		Vaults: Sealing, venting, and ventilation. 192.187 (a) thru (c)			X	
81.		Vaults: Drainage and waterproofing 192.189 (a) thru (c)			X	
82.		Design pressure of plastic fittings 192.191 (a) & (b)			X	
83.		Valve installation in plastic pipe. 192.193			X	

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SUBPART D – DESIGN OF PIPELINE COMPONENTS			S	U	N/A	N/C
84.	480-93-180 (1)	Protection against accidental over-pressuring 192.195 (a) & (b) <b>GOP Section 2.03 and 4.06</b>	X			
85.		Control of the pressure of gas delivered from high-pressure distribution systems. 192.197 (a) thru (c)			X	
86.		Except for rupture discs, each pressure relief or pressure limiting device must: 192.199 (a) thru (h) <b>GOP Section 2.03</b>	X			
87.		Required capacity of pressure relieving and limiting stations. 192.201(c) <b>GOP Section 2.03</b>	X			
88.		Instrument, Control, and Sampling Pipe and Components 192.203(a) & (b)			X	

**Comments:**

Items 59-62 -- IEP does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual.

Items 65 – 67 IEP does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual.

Items 68-73 – IEP has no compressor stations.

Items 74, 75 – IEP has no pipe/bottle-type holders.

Item 77 – No Distribution

Items 78-81 No vaults in system.

Items 82-83 No plastic in system.

Item 85 No Distribution

Items 88 IEP does not install new sensing lines and has not had to replace existing components. If this condition were to occur, they would hire an engineering company and add these sections to their manual.

SUBPART E – WELDING OF STEEL IN PIPELINES			S	U	N/A	N/C
WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION						
89.	480-93-180(1)	Welding procedures must be qualified under <b>Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code</b> (2001 ed.) by destructive test. Amdt. 192-103 pub 06/09/06, eff. 07/10/06. .225(a) <b>GOP Section 6.06.2</b>	X			
90.		Retention of welding procedure – details and test .225(b) <b>GOP Section 6.06.2</b>	X			
91.		Welders must be qualified by <b>Section 6 of API 1104 (20<sup>th</sup> edition 2007, including errata 2008) or Section IX of the ASME Boiler and Pressure Vessel Code (2007 edition, July 1, 2007)</b> , except that a welder qualified under an earlier edition than currently listed in <b>192.7</b> may weld, but may not requalify under that earlier edition. (Amdt 192-114 Pub. 8/11/10 eff. 10/01/10). <b>GOP Section 6.06.3</b>	X			
92.		Welders may be qualified under <b>section I of Appendix C</b> to weld on lines that operate at < <b>20% SMYS</b> . .227(b)			X	
		Oxyacetylene welders may qualify under 49 CFR § 192 Appendix C, but may only weld the following size pipe: 480-93-080(1)(a)	S	U	N/A	N/C
93.	480-93-180 (1)	<ul style="list-style-type: none"> <li>• Nominal <b>two-inch</b> or smaller branch connections to nominal <b>six-inch</b> or smaller main or service pipe. 480-93-080(1)(a)(i)</li> </ul>			X	
94.		<ul style="list-style-type: none"> <li>• Nominal <b>two-inch</b> or smaller below ground butt welds 480-93-080(1)(a)(ii)</li> </ul>			X	
95.		<ul style="list-style-type: none"> <li>• Nominal <b>four-inch</b> or smaller above ground manifold and meter piping operating at 10 psig or less. 480-93-080(1)(a)(iii)</li> </ul>			X	
96.	480-93-180(1)	<ul style="list-style-type: none"> <li>• Appendix C Welders re-qualified <b>2/Yr (7.5Months)</b> 480-93-080(1)(a)(iv)</li> </ul>			X	
97.		Use of testing equipment to record and document essential variables 480-93-080(1)(b) (eff 6/02/05) <b>GOP Section 6.06.3</b>	X			
98.		Qualified written welding procedures must be located on-site where welding is being performed 480-93-080(1)(d) <b>GOP Section 3.05 and 6.06.2</b>	X			



# Utilities and Transportation Commission

## Standard Inspection Report for Intrastate Gas Systems

### Operations and Maintenance Procedures and Plan Review

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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) <b>GOP Section 3.05 and 6.06</b>	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 <b>6 months</b> .229(b) <b>GOP Section 3.05 and 6.0.6.3.5</b>	X			
102.		A welder qualified under .227(a)... .229(c)				
103.		<ul style="list-style-type: none"> <li>May not weld on pipe that operates at <math>\geq</math> 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the <b>sections 6 or 9 of API Standard 1104</b>; may maintain an ongoing qualification status by performing welds tested and found acceptable at least <b>twice per year</b>, not exceeding <b>7½ months</b>; may not requalify under an earlier referenced edition. .229(c)(1)</li> </ul>			X	
104.		<ul style="list-style-type: none"> <li>May not weld on pipe that operates at &lt; 20% SMYS unless is tested in accordance with .229(c)(1) or re-qualifies under .229(d)(1) or (d)(2). .229(c)(2) <b>GOP Section 6.06.3</b></li> </ul>	X			
		Welders qualified under .227(b) may not weld unless: .229(d)	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
105.	480-93-180(1)	<ul style="list-style-type: none"> <li>Re-qualified within <b>1 year/15 months</b>, or .229(d)(1)</li> </ul>			X	
106.		<ul style="list-style-type: none"> <li>Within <b>7½ months</b> but at least <b>twice per year</b> had a production weld pass a qualifying test .229(d)(2)</li> </ul>			X	
107.		Welding operation must be protected from weather .231 <b>GOP Section 6.06.4.3</b>	X			
108.		Miter joints ( <b>consider pipe alignment</b> ) .233 <b>GOP Section 6.06.4.2 – Not permitted</b>			X	
109.		Welding preparation and joint alignment .235 <b>GOP Section 6.06.4.2</b>	X			
110.		Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure: .241(a) thru (c) <b>GOP Section 6.06.4.8</b>	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) <b>GOP Section 6.06.4.14</b>	X			
112.	Repair or removal of defects.245 (a) thru (c) <b>GOP Section 6.06.4.9</b>	X				
		<ul style="list-style-type: none"> <li>Sleeve Repair – low hydrogen rod (<b>Best Practices –ref. API 1104 App. B, In Service Welding</b>)</li> </ul>				

**Comments:**

Item 92 – IEP does not qualify welders under Section I of Appendix C  
 Items 93-96 – IEP does not use oxyacetylene welders  
 Item 100 – No compressor stations  
 Item 103 – No pipe operating >20% SMYS  
 Items 105, 106 – IEP does not qualify welders under Section I of Appendix C  
 Items 108 – Miter joints are not permitted

<b>SUBPART F - JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING</b>			S	U	N/A	N/C
<b>WAC 480-93-080 – WELDER &amp; PLASTIC JOINER IDENTIFICATION and QUALIFICATION</b>						
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)			X	
115.		Each solvent cement joint on plastic pipe must comply with the following: .281(b)				
116.		<ul style="list-style-type: none"> <li>The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint. .281(b)(1)</li> </ul>			X	
117.		<ul style="list-style-type: none"> <li>The solvent cement must conform to ASTM Designation: D 2513. .281(b)(2)</li> </ul>			X	
118.		<ul style="list-style-type: none"> <li>The joint may not be heated to accelerate the setting of the cement. .281(b)(3)</li> </ul>			X	

# Utilities and Transportation Commission

## Standard Inspection Report for Intrastate Gas Systems

### Operations and Maintenance Procedures and Plan Review

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119.	480-93-180(1)	Each heat-fusion joint on plastic pipe must comply with the following: .281(c)				
120.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X	
121.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X	
122.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X	
123.		<ul style="list-style-type: none"> <li>Heat may not be applied with a torch or other open flame. .281(c)(4)</li> </ul>			X	
124.		Each adhesive joint on plastic pipe must comply with the following: .281(d)				
125.		<ul style="list-style-type: none"> <li>The adhesive must conform to ASTM Designation: D 2517. .281(d)(1)</li> </ul>			X	
126.		<ul style="list-style-type: none"> <li>The materials and adhesive must be compatible with each other. .281(d)(1)</li> </ul>			X	
127.		Each compression type mechanical joint on plastic pipe must comply with the following: .281(e)				
128.		<ul style="list-style-type: none"> <li>The gasket material in the coupling must be compatible with the plastic. .281(e)(1)</li> </ul>			X	
129.		<ul style="list-style-type: none"> <li>A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling. .281(e)(2)</li> </ul>			X	
130.		480-93-180(1)	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.	<ul style="list-style-type: none"> <li>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)</li> </ul>				X	
133.	<ul style="list-style-type: none"> <li>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)</li> </ul>				X	
134.	<ul style="list-style-type: none"> <li>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)</li> </ul>				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)				X	
136.	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)				X	
137.	480-93-180(1)	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.		<ul style="list-style-type: none"> <li>Use an apparatus for the test as specified in ASTM D 638 (except for conditioning). .283(b)(1)</li> </ul>			X	
139.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X	
140.		<ul style="list-style-type: none"> <li>The speed of testing is 0.20 in. (5.0 mm) per minute, plus or minus 25 percent. .283(b)(3)</li> </ul>			X	
141.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X	
142.		<ul style="list-style-type: none"> <li>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</li> </ul>			X	

# Utilities and Transportation Commission

## Standard Inspection Report for Intrastate Gas Systems

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		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)					
143.		<ul style="list-style-type: none"> <li>Each specimen that fails at the grips must be retested using new pipe. .283(b)(6)</li> </ul>			X		
144.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X		
145.	480-93-180(1)	A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints. .283(c)			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)			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.		<ul style="list-style-type: none"> <li>Appropriate training or experience in the use of the procedure; and .285(a)(1)</li> </ul>			X		
149.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X		
150.		The specimen joint must be: .285(b)					
151.		<ul style="list-style-type: none"> <li>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)</li> </ul>			X		
152.		<ul style="list-style-type: none"> <li>In the case of a heat fusion, solvent cement, or adhesive joint; .285(b)(2)</li> </ul>			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)			X		
154.		Examined by ultrasonic inspection and found not to contain flaws that may cause failure; or .285(b)(2)(ii)			X		
155.		Cut into at least three longitudinal straps, each of which is: .285(b)(2)(iii)			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)			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)			X		
158.		A person must be requalified under an applicable procedure, if during any 12-month period that person: .285(c)					
159.		<ul style="list-style-type: none"> <li>Does not make any joints under that procedure; or .285(c)(1)</li> </ul>			X		
160.	<ul style="list-style-type: none"> <li>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)</li> </ul>			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)			X			
		Plastic pipe joiners re-qualified <b>1/Yr (15 Months)</b> 480-93-080 (2)					
162.	480-93-180(1)	<ul style="list-style-type: none"> <li>Qualified written plastic joining procedures must be located on-site where plastic joining is being performed. 480-93-080(2)(a)</li> </ul>			X		
163.		<ul style="list-style-type: none"> <li>Plastic pipe joiners re-qualified if no production joints made during any 12 month period 480-93-080(2)(b) (eff 6/02/05)</li> </ul>			X		
164.		<ul style="list-style-type: none"> <li>Tracking production joints or re-qualify joiners <b>1/Yr (12Months)</b> 480-93-080(2)(c) (eff 6/02/05)</li> </ul>			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			X		

**Comments:**

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

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Items 114-165 – IEP uses only welding to join pipe

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 <b>GOP Section 6.10</b>	X			
167.		Inspection of each transmission line and main during construction 192.305 <b>GOP Section 6.10</b>	X			
168.		Inspection of materials 192.307 <b>GOP Section 6.10</b>	X			
169.		Repair of steel pipe 192.309 (a) thru (e) <b>GOP Section 3.04</b>	X			
170.		Repair of plastic pipe. 192.311			X	
171.		Bends and elbows. 192.313 (a) thru (c) <b>GOP Section 6.07</b>	X			
172.		Wrinkle bends in steel pipe. 192.315 (a) & (b) <b>GOP Section 6.07.3 – Not Allowed</b>	X			
173.		Protection from hazards 192.317 (a) thru (c) <b>GOP Section 2.02</b>	X			
174.		Installation of Pipe in a ditch 192.319 (a) thru (c) <b>GOP Section 6.11</b>	X			
175.		Installation of plastic pipe. 192.321 (a) thru (h)			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)			X	
177.		Stated acceptable time limit for maximum cumulative ultraviolet light exposure 480-93-178 (2)			X	
178.		Separation requirements when installing plastic pipelines parallel to other underground utilities 480-93-178 (4)			X	
179.		Separation requirements when installing plastic pipelines perpendicular to other underground utilities 480-93-178 (5)			X	
180.		Casings 192.323 (a) thru (d)			X	
181.		Casing of pipelines. 480-93-115 (1) thru (4)			X	
182.		Underground clearance. 192.325 (a) thru (d).			X	
183.		Cover. 192.327 (a) thru (g)			X	

**Comments:**  
Item 170 – IEP has no plastic pipe  
Item 175-183 – IEP has no plastic pipe

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)			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)			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)			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)			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)			X	

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

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SUBPART H - CUSTOMER METERS, SERVICE REGULATORS, and SERVICE LINES					
189.	480-93-180 (1)	Minimum service line installation requirements as prescribed under 192.361 (a) thru (g)			X
190.		Location of service-line valves as prescribed under 192.365 (a) thru (c)			X
191.		General requirements for locations of service-line connections to mains and use of compression fittings 192.367 (a) thru (b)(2)			X
192.		Connections of service lines to cast iron or ductile iron mains. 192.369 (a) thru (b)			X
193.		Provisions for new service lines not in use 192.379 (a) thru (c)			X
194.		EFV performance requirements §192.381 (a) thru (e)			X
195.		Excess flow valves, does the program must meet the requirements outlined in §192.38?			X
196.		Customer notification in accordance with §192.383.			X

**Comments:**  
 Items 184-196 – IEP has no customer meters, service regulators, or service lines.

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 <b>GOP Section 2.08</b>	X			
198.	480-93-180(1)	Written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. 480-93-110(4) <b>GOP Section 3.11</b>	X			
199.		Recording the condition of all underground metallic facilities each time the facilities are exposed. 480-93-110(6) <b>GOP Section 3.09</b>	X			
200.		CP test reading on all exposed facilities where coating has been removed 480-93-110(8) (eff 6/02/05) <b>GOP Section 3.09</b>	X			
201.		Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) 480-93-110(2) <b>GOP Section 3.11</b>	X			
202.		Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas ( <b>1 per 3 years/39 months</b> ) .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) <b>GOP Sections 3.04 &amp; 3.09</b>	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) <b>GOP Section 4.07</b>	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 <b>GOP Section 3.11</b>	X			
<b>WAC 480-93-110 Corrosion Requirements</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
207.	480-93-180(1)	Casings inspected/tested annually not to exceed <b>fifteen months</b> 480-93-110(5) <b>GOP Section 2.08</b>	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 <b>90 days</b> 480-93-110(5)(b) <b>GOP Section 3.11.4</b>	X			
210.		Casing shorts cleared when practical 480-93-110(5)(c) <b>GOP Section 3.11</b>	X			
211.		Shorted conditions leak surveyed within 90 days of discovery. <b>Twice annually/7.5 months</b> 480-93-110(5)(d) <b>GOP Section 3.11</b>	X			

**Utilities and Transportation Commission**  
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<b>SUBPART I - CORROSION CONTROL</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>212.</b>		CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched) 480-93-110(3) <b>GOP Section 3.11</b>	X			

**Comments:**  
Item 202 – IEP has no bare/unprotected lines  
Item 205 – IEP has no cast/ductile iron  
Item 208 – IEP has no casings without test leads

<b>SUBPART J – TEST REQUIREMENTS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>213.</b>		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. <b>GOP Section 6.09</b>	X			
<b>214.</b>		Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS. 192.505 (a) thru (e)			X	
<b>215.</b>	480-93-180(1)	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) <b>GOP Sections 6.09.1 &amp; 6.09.8</b>	X			
<b>216.</b>		Test requirements for pipelines to operate below 100 psig. 192.509 (a) & (b)			X	
<b>217.</b>		Test requirements for service lines. 192.511 (a) thru (c)			X	
<b>218.</b>		Test requirements for plastic pipelines. 192.513 (a) thru (d)			X	
<b>219.</b>		Environmental protection and safety requirements. 192.515 (a) & (b) <b>GOP Section 6.09.6</b>	X			
<b>220.</b>		Records 192.517 Refer also to 480-93-170 (7) (a-h) below. <b>GOP Section 6.09.9</b>	X			

**Comments:**  
Item 214 – No lines operating at or above 30% SMYS  
Item 216 – No lines operating below 100 psig  
Item 217 – No service lines  
Item 218 – No plastic pipelines

<b>WAC 480-93-170 PRESSURE TEST PROCEDURES</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>221.</b>		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) <b>GOP Section 6.09.1</b>	X			
<b>222.</b>		<ul style="list-style-type: none"> <li>• 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) <b>GOP Section 6.09.1</b></li> </ul>	X			
<b>223.</b>	480-93-180(1)	<ul style="list-style-type: none"> <li>• 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) <b>GOP Section 6.09.1</b></li> </ul>	X			
<b>224.</b>		<ul style="list-style-type: none"> <li>• 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)</li> </ul>			X	
<b>225.</b>		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)			X	
<b>226.</b>		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)			X	

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

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227.	480-93-180(1)	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). <b>GOP Section 6.09.9</b>	X			
228.		Maintain records of each test where multiple pressure tests are performed on a single installation. 480-93-170(9) <b>GOP Section 6.09.9</b>			X	
229.		Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations. 480-93-170(10) <b>GOP Section 6.09.8</b>	X			
230.		<ul style="list-style-type: none"> <li>• When there are no manufacturer's recommendations, then tested at an appropriate schedule determined by the operator. <b>GOP Section 6.09.8</b></li> </ul>	X			
231.		<ul style="list-style-type: none"> <li>• Test equipment must be tagged with the calibration or accuracy check expiration date. <b>GOP Section 6.09.8</b></li> </ul>	X			

**Comments:**  
Item 224 – IEP does not use this process  
Items 225-226 – No service lines or distribution mains  
Items 228 – No multiple pressure tests performed

<b>SUBPART K - UPRATING</b>						
			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		Provisions for meeting the minimum requirements for increasing maximum allowable operating pressure (uprating) for pipelines.				
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 <b>30 % or more</b> of SMYS in steel pipelines. 192.555 (a) thru (e)			X	
234.		Uprating: Steel pipelines to a pressure that will produce a hoop stress <b>less than 30 %</b> of SMYS: (plastic, iron, and ductile iron pipelines.) 192.557 (a) thru (d)			X	
<b>WAC 480-93-155 - UPRATING</b>						
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:**  
Items 232-237 – IEP does not perform uprates

<b>SUBPART L - OPERATIONS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
238.	480-93-180(1) / 192.605(a)	Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> ) 192.605(a) <b>Note:</b> Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09 <b>GOP Section 2.14</b>	X			
239.		Availability of construction records, maps, operating history to operating personnel 192.605(b)(3) <b>GOP Section 6.01.8</b>	X			

**Comments:**

<b>SUBPART – L DAMAGE PREVENTION PROGRAM PROCEDURES</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
240.		<b>Damage Prevention (Operator Internal Performance Measures)</b>	S	U	N/A	N/C

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

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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. Recommended only, not required)			X	
242.		Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?			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?			X	
244.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? <b>GOP Section 2.14</b>	X			
245.		Review operator locating and excavation procedures for compliance with state law and regulations. <b>GOP Sections 3.07 (Handling the requests) &amp; 3.08</b>	X			
246.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
247.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements? <b>GOP Section 3.08</b>	X			
248.		<b>Informational purposes only. Not Required.</b> Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at <a href="https://identity.damagereporting.org/cgareg/control/login.do">https://identity.damagereporting.org/cgareg/control/login.do</a> <b>Y</b> <b>N</b> <b>X</b>	X			
249.		<b>PHMSA Areas of Emphasis:</b>				
		<ul style="list-style-type: none"> <li>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?</li> </ul>			X	
250.		<ul style="list-style-type: none"> <li>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 recurrence?</li> </ul>			X	

**Comments:**

Items 241-243 – IEP has very low amount of locate requests per yer (Avg. 1 to 2 per year) 100-120 notices but they are generally not in the area.  
Item 248 – No damages to submit  
Item 249-250 – The operator does not perform this and hasn't had any accidents.

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 <b>GOP Section 3.02 (Accidents and Incidents 1-4)</b>	X			

**Comments:**

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) <b>GOP Section 3.10</b>	X			
253.		Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) 480-93-015 (3) <b>GOP Section 3.10</b>	X			
254.	480-93-180(1)	Records maintained for usage, odorant tests performed and equipment calibration (5yrs) 480-93-015(4) <b>GOP Section 3.10</b>	X			



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

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**Comments:**

<b>SUBPART – L PIPELINE PURGING PROCEDURES</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>255.</b>	480-93-180(1)	(a) Lines containing <b>air</b> must be properly purged. <b>GOP Section 3.06</b>	X			
<b>256.</b>	480-93-180(1)	(b) Lines containing <b>gas</b> must be properly purged <b>GOP Section 3.06</b>	X			

**Comments:**

<b>WAC 480-93-185 GAS LEAK INVESTIGATION</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		Procedures for the prompt investigation of any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities.				
<b>257.</b>	480-93-180(1)	<ul style="list-style-type: none"> <li>received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public 480-93-185(1) <b>GOP Section 3.02</b></li> </ul>	X			
<b>258.</b>	480-93-180(1)	<ul style="list-style-type: none"> <li>Grade leak in accordance with WAC 480-93-186, and take appropriate action 480-93-185(1) <b>GOP Section 4.02 and ERM 1.2</b></li> </ul>	X			
<b>259.</b>	480-93-180(1)	<ul style="list-style-type: none"> <li>retain the leak investigation record for the life of the pipeline. 480-93-185(1) <b>GOP Section 4.02</b></li> </ul>	X			
<b>260.</b>	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) <b>GOP Section 3.02</b>	X			
<b>261.</b>	480-93-180(1)	Taking appropriate action when leak indications originating from a foreign source. Notification requirements. 480-93-185(3) <b>ERM Section 2.4</b>	X			

<b>WAC 480-93-186 LEAK EVALUATION</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>262.</b>	480-93-180(1)	Grade leaks as defined in WAC 480-93-18601 to establish the leak repair priority. 480-93-186(1) <b>GOP Section 4.02</b>	X			
<b>263.</b>	480-93-180(1)	Procedure for evaluating the concentration and extent of gas leakage 480-93-186(2) <b>Note:</b> Including third-party damage where there is a possibility of multiple leaks and underground migration into nearby buildings. <b>GOP Section 4.02</b>	X			
<b>264.</b>	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) <b>GOP Section 4.02</b>	X			
<b>265.</b>	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) <b>COP Section 4.02 – However, leaks are not downgraded.</b>			X	

**Comments:**

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

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<b>WAC 480-93-187 GAS LEAK RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		Gas leak records must contain, at a minimum, the criteria outlined in 480-93-187 (1-13)				
<b>266.</b>	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. <b>ERM Section 2.5 –</b> <b>Previously maintained in hard copy.</b>	X			

**Comments:**

<b>WAC 480-93-188 GAS LEAK SURVEYS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>267.</b>		gas leak surveys using a gas detection instrument covering areas listed in 480-93-188(1)(a-e) <b>GOP Section 4.02, Entire pipeline is surveyed annually.</b>	X			
<b>268.</b>		Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) 480-93-188(2) <b>GOP Section 4.02</b>	X			
<b>269.</b>		Surveys conducted according to the minimum frequencies outlined under 480-93-188(3)(a-d) <b>GOP Section 4.02</b>	X			
<b>270.</b>	480-93-180(1)	Surveys conducted under the following circumstances outlined under 480-93-188(4)(a-e) <b>GOP Section 4.02</b>	X			
<b>271.</b>		Survey records must be kept for a minimum of five years and contain information required under 480-93-188(5)(a-f) <b>GOP Section 4.02</b>	X			
<b>272.</b>		Self audits as necessary, but not to exceed three years between audits and meet the criteria outlined under 480-93-188(6)(a-e) <b>GOP Section 4.02</b>	X			

**Comments:**

<b>SUBPART - M VALVE AND VAULT MAINTENANCE PROCEDURES</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		<b>Service Valves</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>273.</b>	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)? <b>GOP Section 4.05 for regular valves, but no service valves are used in this system.</b>			X	
<b>274.</b>		Service valve maintenance <b>(1 per yr/15 months)</b> 480-93-100(3)			X	

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

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275.		Service valve installation and maintenance program fully implemented by 6/01/07? 480-93-100(6)			X	
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**Comments:**  
Items 273-275 – No distribution valves and no service valves.

SUBPART N — QUALIFICATION of PIPELINE PERSONNEL			S	U	N/A	N/C
Date of last UTC staff OQ plan review 11/21/2019						
276.	480-93-180(1)	Have “New Construction” activities been identified and included in the operator’s covered task list? 480-93-013 <b>No new activities identified. New construction welding is under GOP 3.05</b>	X			

**Comments:**

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) <b>GOP Section 2.11</b>	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) <b>GOP Section 2.11</b>	X			

MAPS, DRAWINGS, and RECORDS of GAS FACILITIES			S	U	N/A	N/C
279.	480-93-180(1)	Records updated no later than <b>6 months</b> from completion of construction activity and made available to appropriate personnel. 480-93-018(3) <b>GOP Section 6.01.8</b>	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) <ul style="list-style-type: none"> <li>• 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)</li> <li>• 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)</li> <li>• A public highway, as defined in RCW 81.80.010(3). 480-93-20 (1)(a)(iii)</li> </ul> <b>GOP Section 2.01</b>	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) <ul style="list-style-type: none"> <li>• 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)</li> <li>• 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)</li> </ul>	X			

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		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) <b>GOP Section 2.01</b>			
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**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)**

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB-12-05	Mar 23, 12	Cast Iron Pipe (Supplementary Advisory Bulletin)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>