

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

Inspection Report			
Inspection ID/Docket number	8026		
Inspector Name & Submit Date	Dave Cullom 8/31/2020		
Chief Eng. Name & Review Date	Joe Subsits, 9/1/2020		
Operator Information			
Name of Operator:	Georgia-Pacific Consumer Products (Camas) LLC.	OP ID #:	31096
Name of Unit(s):	Camas Mill		
Records Location:	Camas, Wa		
Date(s) of Last (unit) Inspection:	6/12/2017	Inspection Date(s):	8/11/2020-8/13/2020

<p>Inspection Summary:</p> <p>The main portion of the inspection was performed in IA and consisted of records, plan/procedure review, and a field inspection of pipeline facilities. No probable violations or areas of concern were noted. The last ILI run was conducted in 2013. Instant off CP readings were taken as well as readings for AC induced current on the system.</p>

HQ Address: 401 NE Adams Street Camas, WA 98607	System/Unit Name & Address: 401 NE Adams Street Camas, WA 98607	
Co. Official: Shawn Wood Phone No.: (360) 834-8162 Fax No.: (360) 834-8462 Emergency Phone No.: (360) 834-8414	Phone No.: N/A Fax No.: (360) 834-8462 Emergency Phone No.: (360) 834-8414 N/A	
Persons Interviewed	Title	Phone No.
Ron Simmons	Pipeline Manager	404-317-4035
Roy Rogers	Consultant Cathodic Protection Engineer	503-720-3220
Steve Ringquist	Pipeline Coordinator	(360) 834-8116
Steven Hernandez	Principal Consultant	(720) 647-3147

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UTC staff conducted abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.			
(check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	7/21/2020- 7/22/2020

GAS SYSTEM OPERATIONS			
Gas Supplier	Williams		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	0
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	0
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	1.04 miles total and .62 in an HCA		
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:		250 psig	205 psig
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	No		
Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Comments:			
The % SMYS as listed on the current and the last several Annual Reports appears to be a typographical error and GP is currently looking into this and will submit a supplemental AR for 2020 if needed.			

Pipe Specifications:			
Year Installed (Range)	1993	Pipe Diameters (Range)	10.75
Material Type	X42 and X52	Line Pipe Specification Used	AP5L
Mileage	1.04	SMYS %	30-33% at 800 MAOP
Supply Company	CSI Tubular (Pipe)	Class Locations	3

REPORTING RECORDS			S	U	N/A	N/C
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator submitted information into NPMS database along with changes made after the original submission and have they 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 2/4/20 submission checked for the NPMS***	X			
2.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which (regardless of cause) ;				
3.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization;			X	

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REPORTING RECORDS			S	U	N/A	N/C
4.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; Note: Report all damages regardless if claim was filed with pipeline company or not.			X	
5.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas;			X	
6.	480-93-200(1)(d)	Results in the unintentional ignition of gas;			X	
7.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;			X	
8.	480-93-200(1)(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;			X	
9.	480-93-200(1)(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			X	
10.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 24 hours) for;			X	
11.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			X	
12.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;			X	
13.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
14.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP			X	

Comments:

3-14 *Notes - No incidents have occurred. *****

15.	480-93-200(5)	Written incident reports (within 30 days) including the following;	S	U	N/A	N/C
16.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;			X	
17.	480-93-200(4)(b)	The extent of injuries and damage;			X	
18.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;			X	
19.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;			X	
20.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
21.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;			X	
22.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;			X	
23.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;			X	
24.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;			X	
25.	480-93-200(4)(j)	Line type;			X	
26.	480-93-200(4)(k)	City and county of incident; and			X	
27.	480-93-200(4)(l)	Any other information deemed necessary by the commission.			X	
28.	480-93-200(5)	Submit a supplemental report if required information becomes available			X	
29.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure			X	

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Comments:

15-29 *Notes - No incidents have occurred.*****

30.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission’s Virtual DIRT system or on-line damage reporting form)				
31.	49 CFR 192.617	Did the operator have appropriate records of previous accidents and failures including third party damage and leak response to ensure appropriate operator response? 3-14 ***Notes - No incidents have occurred.***			X	
32.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) ***Notes - No incidents have occurred.***			X	
33.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed? ***Notes - No incidents have occurred.***			X	
34.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? ***Notes - Records maintained for two years and made available to the commission upon request.*** ***Notes - No incidents have occurred.***			X	
35.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
36.	480-93-200(8)(a)	<ul style="list-style-type: none"> • Notification requirements for excavators under RCW 19.122.050(1) 	X			
37.	480-93-200(8)(b)	<ul style="list-style-type: none"> • A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 	X			
38.	480-93-200(8)(c)	<ul style="list-style-type: none"> • Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. 	X			
39.	480-93-200(9)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a) • A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) 	X			
40.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission’s Virtual DIRT system or on-line damage reporting form) ***Notes - No incidents have occurred.***			X	
41.	442(c)(6)	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 – If the operator receives a locate they pothole within 25feet**** Years ago they had a HDD under their line, but they exposed GPs	X			
42.	Damage Prevention (Operator Internal Performance Measures)	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) ****Notes - Ron and Carson have both performed it for Roy Rogers.****	X			

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43.	PHMSA – State Program Evaluation Questions	Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? **** Notes – The contract renewal depends on good performance..	X			
44.		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 – This has not been issue. ****	X			
45.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? *****Notes - This was reviewed in the OQ *****	X			
46.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. *****Notes - This was reviewed in the O&M review completed this year *****	X			
47.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ****Notes – I reviewed a 7/2/20 call that was cleared ****	X			
48.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? *****Notes – Roy Rogers OQ’s were valid. ****	X			
49.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year. (NOTE: PHMSA extension to June 15, 2013 for the year 2012).	S	U	N/A	N/C
50.	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
51.	49 CFR 195.402	Did the operator follow written procedures pertaining to notification of excavation, marking, positive response ant the availability and use of the one call system?	X			
52.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. ***Notes - This has not occurred. ***			X	
53.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
54.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. ***Notes - This has not occurred. No construction or repair has been performed ***			X	
55.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
56.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			X	
57.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
58.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main			X	
59.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
60.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length			X	
61.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
62.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule)			X	
63.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig			X	

Comments:
56-63 *Notes - This has not occurred. No construction or repair has been performed*****

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
64.	Damage Prevention Program					
65.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample. ***Notes – Please see question 47***	X			
66.	480-93-015(1)	Odorization of Gas – Concentrations adequate? ***Notes - This was reviewed in IA.***	X			
67.	480-93-015(2)	Monthly Odorant Sniff Testing ***Notes - This was reviewed in IA.***	X			
68.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements *****Notes – No instances of low odorant. ****			X	
69.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) *****Notes - I checked and it is done annually****	X			
70.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) ***Notes – No bridges or spans***			X	
71.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? ***Notes – One example was provided where a ticker that was scratched off was replaced****	X			
72.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained ***Notes - No leaks have occurred***			X	
73.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained ***Notes - No leaks have occurred***			X	
74.	480-93-187	Gas Leak records – Content ***Notes - No leaks have occurred***			X	
75.	480-93-188(1)	Gas Leak surveys - Coverage ***Notes - Records reviewed in IA inspection***	X			
76.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) *****Notes - The unit is tested before each use.*****	X			
77.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

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

78.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs ***Notes - No special leaks have occurred or were needed.***			X	
79.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred. ***Notes - No special leaks have occurred or were needed.***			X	
80.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected. ***Notes - No special leaks have occurred or were needed.***			X	
81.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions ***Notes – Only 1 earthquake event more than 5 years ago****			X	
82.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. ***Notes - No special leaks have occurred or were needed.***			X	

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
83.	480-93-188(5)	Gas survey records: Retention/Content ****Notes – They are currently kept back to 2009****	X			
84.	480-93-188(6)	Leak Survey Program/Self Audits *****Notes – They are done once a year minimum*****	X			

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
85.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed ****Notes - This has not occurred during this inspection time period.*****			X	
86.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) ****Notes - This has not occurred during this inspection time period.*****			X	
87.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) ****Notes - Records reviewed in IA.*****	X			
88.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months ****Notes - No casings*****			X	
89.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods ****Notes - No casings*****			X	
90.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days ****Notes - This has not occurred during this inspection time period. *****			X	
91.	480-93-110(5)(c)	Casing shorts cleared when practical ****Notes - This has not occurred during this inspection time period. *****			X	
92.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months ****Notes - This has not occurred during this inspection time period.*****			X	

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
93.	480-93-015(1)	Odorization levels ****Notes – Did not field check. Records reviewed in IA****	X			
94.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) ****Notes - No casings*****			X	

Comments:
 Please review Form R in the inspection database.

EXIT INTERVIEW

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Exit Interview Conducted? Yes Items Covered: Review of inspection items and Q/A	Date: 8/13/2020
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For PHMSA Advisory Bulletins, go to <https://www.phmsa.dot.gov/regulations-fr/notices>