

C 8049

UTC Standard Inspection Report
 Intrastate Gas Distribution
 RC - State Statutes and Rules
 Records Review and Field Inspections

Inspector and Operator Information

PHMSA Advisory Bulletins

| | | |
|------------------------|--------------------------------|---------------------------------|
| Insp. No. | Inspector - Lead | Inspector - Assist |
| 8049 | Rukke, Scott | Tinnerstet, Darren |
| Operator | Unit | Records Location - City & State |
| Cascade Natural gas Co | Aberdeen | Aberdeen WA |
| Inspection Start Date | Inspection Exit Interview Date | Engineer Submit Date |
| 10-07-2020 | 11-06-2020 | 11-09-2020 |

Inspection Summary This was a unit inspection of the Aberdeen District. All records except a few misc. were reviewed electronically due to Covid-19 concerns.

Instructions and Ratings Definitions

INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

N/A - Not Applicable (does not apply in this inspection)

N/C - Not Checked/Evaluated (was not inspected during this inspection)

INSPECTION RESULTS

Unsatisfactory Responses

0

Area of Concern Responses

0

Not Applicable Responses

3

Not Checked / Evaluated Responses

1

Unsatisfactory List

Area of Concern List

Not Applicable List

4,5,6,

Not Checked / Evaluated List

17

If an item is marked Form a- annual review. U, N/Form a- annual review or N/C, **an explanation must be included in this report.

Records, Procedures and Reports

Question #1.

Has the operator provided accurate maps (or updates) of pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

Statutory Reference
 RCW 81.88.080

1. Result
 Satisfactory

1. Notes
 OPS 10,
 section 16

Statutory Reference 2. Result 2. Notes
 WAC 480-93-180(1) Satisfactory CP 750, Outside Leak Investigation

Question #3.

Does the operator have a procedure for dealing with leaks caused by excavation damage near buildings? Do the procedures

adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?

| Statutory Reference | 3. Result | 3. Notes |
|---------------------|--------------|------------------------------------|
| WAC 480-93-180(1) | Satisfactory | CP 750, Outside Leak Investigation |

Question #4

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. Recommended, not required)

| Reference: | 4. Results | Q4. Within Scope of this Inspection: | 4. Notes |
|--|----------------|---|-----------------------|
| Operator Internal Performance Measures; PHMSA State Program Guidelines | Not Applicable | No such event occurred, or condition existed. | No contract locators. |

Question #5.

Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

| Statutory Reference | Statutory Reference | Reference: | 5. Result | Q5. Within Scope of this Inspection: | 5. Notes |
|---------------------|---------------------|--------------------------------|----------------|---|-----------------------|
| WAC 480-93-007 | WAC 480-93-013 | PHMSA State Program Guidelines | Not Applicable | No such event occurred, or condition existed. | No contract locators. |

Question #6.

Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

| Statutory Reference | Statutory Reference | 6. Result | Q6. Within Scope of this Inspection: | 6. Notes |
|---------------------|---------------------|----------------|---|-----------------------|
| WAC 480-93-007 | WAC 480-93-013 | Not Applicable | No such event occurred, or condition existed. | No contract locators. |

Question #7.

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?

| Statutory Reference | Statutory Reference | 7. Result | 7. Notes |
|---------------------|---------------------|--------------|--|
| WAC 480-93-007 | WAC 480-93-013 | Satisfactory | EWN and CNG OQ task 192-0801 (Task Locating Pipelines) CNG uses form 293 and form 23001 is used to document missed locates. |

Question #8.

Are operator locating and excavation procedures in compliance with RCW 19.122?

| Statutory Reference | Statutory Reference | 8. Result | 8. Notes |
|---------------------|---------------------|--------------|-----------|
| RCW 19.122 | WAC 480-93-250 | Satisfactory | No issues |

Question #9.

Are locates made within the required timelines specified within RCW 19.122 (2 full business days)? Examine record sample.

| Statutory Reference | Statutory Reference | 9. Result | 9. Notes |
|---------------------|---------------------|--------------|--|
| RCW 19.122 | WAC 480-93-250 | Satisfactory | CNG CP 836. A sampling of past locate requests were reviewed with no issues. |

Question #10.

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

| Statutory Reference | Statutory Reference | 10. Result | 10. Notes |
|---------------------|---------------------|--------------|--|
| WAC 480-93-007 | WAC 480-93-013 | Satisfactory | Records were reviewed for CNG's personnel that perform locating in the Aberdeen District. No issues. |

Question #11.

Is the operator appropriately addressing discovered mapping errors, including those that have resulted in excavation damage?

| Reference: | 11. Result | 11. Notes |
|---|--------------|--|
| PHMSA State Program Guidelines Operator Internal Performance Measures | Satisfactory | CP 869 (Updating GIS) CNG 286 has a mapping error question that triggers a review and process to update mapping errors. A sampling or records were reviewed and were good. |

Question #12.

Are mapping corrections timely and according to written procedures?

| Reference: | 12. Result | 12. Notes |
|---|--------------|--|
| PHMSA State Program Guidelines Operator Internal Performance Measures | Satisfactory | Records samples were reviewed and were good. |

Question #13

Are Annual Reports filed with the commission no later than March 15 for the proceeding year?

| Statutory Reference | 13. Result | 13. Notes |
|---------------------|--------------|--------------------|
| WAC 480-93-200(10) | Satisfactory | Submitted on time. |

Question #14.

Did the operator submit a copy of DOT Drug and Alcohol Testing MIS Data Collection Form to the commission when required?

| Statutory Reference | 14. Result | 14. Notes |
|---------------------|--------------|------------|
| WAC 480-93-200(13) | Satisfactory | Submitted. |

Question #15

Are shorted conditions leak surveyed within 90 days of discovery and twice annually/not to exceed 7.5 months?

| Statutory Reference | 15. Result | 15. Notes |
|----------------------|--------------|---|
| WAC 480-93-110(5)(d) | Satisfactory | Shorted casing leak surveys were reviewed through electronic records reviews. |

Comments - Records, Procedures & Reports

Comments - Records Review - Any rating other than Satisfactory, requires comments. Ensure you annotate the question number for each comment.

All records were reviewed electronically due to Covid-19 concerns.

FIELD INSPECTION OBSERVATIONS

Question #16

Welding procedures located on site where welding is performed?

Statutory Reference

WAC 480-93-080(1)(e)

16. Results

Satisfactory

16. Notes

Procedures are on employee laptops and carried to each job site.

Question #17

Is the operator using testing equipment necessary to record and document essential variables during welder and procedure testing/qualifications?

Statutory Reference

WAC 480-93-080(1)(c)

17. Results

Not Checked/Evaluated

17. Notes

All welders are tested in Yakima. Welder qualification records show all essential variables being recorded.

 **Comments - Field Observations**

Comments - Field Observations - Any rating other than Satisfactory, requires comments. Ensure you annotate the question number for each comment.

Welders are tested in Yakima. No field observations were made but records indicate that essential variables are recorded.