

Inspection Output (IOR)

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Inspection Information

Inspection Name	Cascade Transmission 8052 and 8053	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	11/21/2019
Status	PLANNED	Lead	Scott Rukke	Plan Approval	11/22/2019 by Joe Subsits
Start Year	2020	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity Start	01/27/2020
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	01/31/2020
Protocol Set ID	GT.2019.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

This is a combined Transmission and TIMP inspection split into two separate assets. Headquarters for TIMP and Transmission for Transmission.

CNG records location and headquarters mailing executive:

TIMP (8053) was completed on January 29, 2020.

Transmission (8052) was partially completed on January 29, 2020 along with TIMP.

The field portion of the Transmission inspection was originally scheduled for April 13, 2020 but was cancelled and will be re-scheduled once the lockdown is lifted for Covid 19.

Additional records were required to complete Form D and those were received on 4/17/2020. These records were reviewed under timecode "plan and procedures review" since these are normally reviewed in the operators office.

8053 TIMP

Drive day Monday January 27, 2020.

Records and Field HCA's inspected - January 28, 2020. (TIMP),

Exit Interview January 29, 2020. No issues identified. (TIMP)

Field, 4/22/2020 - Drove the Kitsap Transmission pipeline starting at the end point at Regulator station R-17 located at Nollwood Lane and Werner Rd near Bremerton.

There is an issue with what CNG is classifying as Transmission. The first 3.5 miles (under 20%) in Shelton were not mapped in NPMS. It was later determined that CNG calls this pipeline segment HP distribution even though it provides supply for the last 35 miles of transmission (over 20%).

Had a conference call on 5/1/2020 with CNG personnel regarding the interpretation of Transmission and how it applies to the first 3.5 miles of pipeline in Shelton.

Field inspection of the Mount Vernon compressor is scheduled for June 23-24.

Reviewed 2017, 2018 and 2019 TRansmission leak survey records for the March Point 8-inch transmission line and the 16" Fredonia Transmission line in the Mount Vernon District.

Inspected the CNG Compressor station. Tested the Fire eyes (2) and gas detectors (2).

Met in CNG's office on 6/24/2020.

Drive day and field 6/23 and 6/25. In office and field 6/24.

The compressor station is located at 14254 Ovenell RD, Mt Vernon, WA

Horsepower – 1150 bhp (Caterpillar Model G3516TA, 100% Load, 1200 RPM)

Building – Fully Enclosed

Emergency shutdown – The compressor station is set to automatically shut down if the line reaches 485 psig or any parameters are outside a preset range. In the event the automatic shutdown fails there are manual reliefs set to fully relieve at 548 psig.

There is a manual shutdown button located onsite, and an override can also be sent from Gas Control to shut down the compressor.

MS Teams meeting with PHMSA and Scott Rukke on 8/5/2020 to discuss the definition of Transmission.

Cascade Nat Gas compliance personnel:

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Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	TIMP 8053	Cascade Natural Gas - Headquarters	unit	88961	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Plastic pipe AMAOP Abandoned	79	79	79	79	100.0%
2.	Transmission 8052	Cascade Natural Gas - Transmission	unit	88963	Storage Fields Bottle/Pipe - Holders Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Plastic pipe AMAOP Abandoned CDA	102	102	102	102	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	TIMP 8053	n/a	IM.QA, IM.BA.BAMETHODS.P, IM.BA.BAMETHODS.R, IM.BA.BANEW.P, IM.BA.BANEW.R, IM.BA.BASCHEDULE.P, IM.BA.BASCHEDULE.R, IM.CA.LOWSTRESSREASSESS.P, IM.CA.REASSESSINTERVAL.P, IM.CA.LOWSTRESSREASSESS.R, IM.CA.PERIODICEVAL.P, IM.CA.PERIODICEVAL.R, IM.CA.REASSESSINTERVAL.R, IM.CA.REASSESSMETHOD.P, IM.CA.REASSESSMETHOD.R, IM.HC.HCAID.P, IM.HC.HCASITES.R, IM.HC.HCAMETHOD2.R, IM.HC.HCADATA.O, IM.HC.HCAID.R, IM.HC.HCAMETHOD2.P, IM.HC.HCANEW.P, IM.HC.HCANEW.R, IM.HC.HCAPIR.P, IM.HC.HCAPIR.R, IM.HC.HCASITES.P, IM.PM.PMMGENERAL.P, IM.PM.PMMOF.R, IM.PM.PMMGENERAL.R, IM.PM.PMMTPD.P, IM.PM.PMMTPD.R, IM.PM.PMMREVQUAL.P, IM.PM.PMMREVQUAL.R, IM.PM.PMMTPDSMYS.P, IM.PM.PMMTPDSMYS.R, IM.PM.PMMOF.P,	P, R, O, S	Detail	

# Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
		IM.RA.RADATA.P, IM.RA.RAMOC.R, IM.RA.RAMETHOD.P, IM.RA.THREATID.R, IM.RA.RADATA.R, IM.RA.THREATID.P, IM.RA.RAMETHOD.R, IM.RA.RAMOC.P, TQ.QUIM, TD.ATM.ATMCORRODEINSP.R, TD.CPMONITOR.REVCURRENTTEST.R, TD.CPMONITOR.DEFICIENCY.R, TD.CPMONITOR.CURRENTTEST.R, TD.CPMONITOR.INTFRCURRENT.R, TD.CPMONITOR.TEST.R, TD.CPMONITOR.CURRENTTEST.O, TD.CP.ELECISOLATE.R, TD.CPEXPOSED.EXPOSEINSPECT.R, TD.CPEXPOSED.EXTCORRODEEVAL.P, TD.CPEXPOSED.EXTCORRODEEVAL.R, TD.CPEXPOSED.EXTCORRODREPAIR.P, TD.CPEXPOSED.EXTCORRODREPAIR.R, TD.ICP.EXAMINE.P, TD.ICP.EXAMINE.R, TD.ICP.EVALUATE.P, TD.ICP.EVALUATE.R, TD.ICP.REPAIR.P, TD.ICP.REPAIR.R, TD.ATM.ATMCORRODEINSP.O		
2. Transmission 8052	n/a	EP.ERG.AUTHORITIES.P, EP.ERG.OUTAGERESTORE.P, EP.ERG.INCIDENTACTIONS.P, EP.ERG.INCIDENTANALYSIS.P, EP.ERG.POSTEVTREVIEW.P, EP.ERG.REVIEW.R, EP.ERG.INCIDENTDATA.P, EP.ERG.NOTICES.P, EP.ERG.READINESS.P, MO.RW.PATROL.R, MO.RW.ROWMARKER.O, MO.RW.ROWMARKER.P, MO.RW.LEAKAGE.R, MO.GMOPP.PRESSREGCAP.R, MO.GMOPP.PRESSREGTEST.R, MO.GMOPP.PRESSREGTEST.O, MO.GO.UPRATE.R, FS.CSSYSROT.CMPFP.O, FS.CSSYSROT.ESDGASBLK.O, FS.CSSYSROT.ESDGASDISCH.O, FS.CSSYSROT.ESDGASSD.O, FS.CSSYSROT.ESDLOCATION.O, FS.CSSYSROT.CMPMAOP.O, FS.CSSYSROT.RELIEFDISCH.O, FS.CSSYSROT.CMPRELIEF.P, FS.CSSYSROT.CMPRELIEF.R, FS.CSSYSROT.CMPGASDET.O, FS.CSSYSROT.CMPESDTEST.P, FS.CSSYSROT.CMPESDTESTDEV.R, FS.CSSYSROT.CMPGASDETREQ.P, FS.CSSYSROT.CMPGASDETM.P, FS.CSSYSROT.CMPGASDETM.R, FS.CSSYSROT.CMPRELIEF.O, FS.CSSYSROT.CMPLUBPROT.O, MO.GO.PURGE.P, MO.GOODOR.ODORIZE.R, MO.GOODOR.ODORIZE.O, MO.GM.VALVEINSPECT.R, MO.GM.VALVEINSPECT.O, MO.GM.HOLDER.P, MO.GM.HOLDER.R, FS.CS.BLDGLOC.O, FS.CS.CMPBLDGVENT.O, FS.CS.CMPERP.O, FS.CS.CMPSUSD.P, FS.CS.CMPMAINT.P, DC.COCMP.CMPCOMBUSTIBLE.P, DC.COCMP.CMPCOMBUSTIBLE.R, DC.COCMP.CMPCOMBUSTIBLE.O, FS.CS.BLDGADJ.O, FS.CS.BLDGEXITS.O, FS.CS.BLDGSPACE.O, FS.CS.CMPNFPA70.O, FS.CS.FENCEGATES.O, FS.CS.BLDGCMBST.O, FS.VA.CMPVLVTEST.P, FS.VA.CMPVLVTEST.R, RPT.NR, RPT.RR, TQ.QU, TQ.QUOMCONST, TQ.TR, TQ.QUIM	P, R, O, S	Detail

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Office Records Review	--	01/27/20	01/31/20	n/a	all planned questions	TIMP 8053	all types	79	79	79	100.0%
2	Office Records Review	--	01/27/20	01/31/20	n/a	all planned questions	Transmission 8052	all types	102	102	102	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No. Entity	Form Name	Status	Date Completed	Activity Name	Asset
1. Attendance List	Office Records Review TIMP	COMPLETED	01/29/2020	Office Records Review	TIMP 8053
2. Attendance List	MS Teams meeting on Transmission Definition	COMPLETED	05/01/2020	Office Records Review	Transmission 8052
3. Attendance List	Field Inspection Mount Vernon Compressor	COMPLETED	06/25/2020	Office Records Review	Transmission 8052
4. Attendance List	WA UTC and PHMSA Discussion on Transmission Definitions	COMPLETED	08/05/2020	Office Records Review	Transmission 8052

Results (all values, 209 results)

217 (instead of 209) results are listed due to re-presentation of questions in more than one sub-group.

DC.COCMP: Compressor Station Construction

- Question Result, ID, References: **Sat, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b))** (also presented in: FS.CS, FS.CS)

Question Text: *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?*

Assets Covered: **Transmission 8052**

Result Notes: **During this inspection combustibles (oils) were observed just outside the compressor building in 55 gallon drums. They are also in portable buildings in close proximity to the main compressor building. They also block part of the access needed for fire control equipment. CNG moved all combustibles away from the compressor building to the other side of the yard. Some of the drums were apparently empty and others were stored temporarily.**
- Question Result, ID, References: **NA, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b))** (also presented in: FS.CS, FS.CS)

Question Text: *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?*

Assets Covered: **TIMP 8053**

Result Notes: **No such relevant facilities/equipment existed in the scope of inspection review.**
- Question Result, ID, References: **Sat, DC.COCMP.CMPCOMBUSTIBLE.P, 192.303 (192.735(a), 192.735(b))** (also presented in: FS.CS)

Question Text: *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?*

Assets Covered: **TIMP 8053, Transmission 8052**

Result Notes: **CP 742. Section 8.7.3**
- Question Result, ID, References: **NA, DC.COCMP.CMPCOMBUSTIBLE.R, 192.735(a) (192.735(b))** (also presented in: FS.CS)

Question Text: *As applicable to the project, are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?*

Assets Covered: **TIMP 8053, Transmission 8052**

Result Notes: **No such activity/condition was observed during the inspection.**

EP.ERG: Emergency Response

- Question Result, ID, References: **Sat, EP.ERG.REVIEW.R, 192.605(a)**

Question Text: *Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?*

Assets Covered: **TIMP 8053, Transmission 8052**

Result Notes: **CP 925 was modified after the Lynden WA incident that was caused by a car striking a house and igniting the house in a gas leak which was not properly called in. CNG changed their call procedure.**

6. Question Result, ID, References [Sat, EP.ERG.INCIDENTDATA.P, 192.605\(b\)\(4\) \(191.5\(a\)\)](#)
 Question Text *Does the process include the steps necessary for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [OPS 9](#)
7. Question Result, ID, References [Sat, EP.ERG.NOTICES.P, 192.615\(a\)\(1\)](#)
 Question Text *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [CP 925](#)
8. Question Result, ID, References [Sat, EP.ERG.READINESS.P, 192.615\(a\) \(192.615\(a\)\(4\)\)](#)
 Question Text *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [CP 925, step 8.1](#)
9. Question Result, ID, References [Sat, EP.ERG.AUTHORITIES.P, 192.615\(a\) \(192.615\(a\)\(8\)\)](#)
 Question Text *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [CP 925](#)
10. Question Result, ID, References [Sat, EP.ERG.OUTAGERESTORE.P, 192.615\(a\) \(192.615\(a\)\(9\)\)](#)
 Question Text *Does the emergency plan include procedures for safely restoring any service outage?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [CP 925](#)
11. Question Result, ID, References [Sat, EP.ERG.INCIDENTACTIONS.P, 192.615\(a\) \(192.615\(a\)\(10\)\)](#)
 Question Text *Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [CP 722, 8.6.7.7.](#)
12. Question Result, ID, References [Sat, EP.ERG.INCIDENTANALYSIS.P, 192.617](#)
 Question Text *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [CP 722](#)
13. Question Result, ID, References [Sat, EP.ERG.POSTEVTREVIEW.P, 192.615\(b\)\(3\)](#)
 Question Text *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?*
 Assets Covered [TIMP 8053, Transmission 8052](#)
 Result Notes [CP 925](#)

FS.CSSYSROT: Compressor Station System Protection

14. Question Result, ID, References [Sat, FS.CSSYSROT.CMPFP.O, 192.171\(a\)](#)

- Question Text *Do compressor stations have adequate fire protection facilities?*
 Assets Covered **Transmission 8052**
 Result Notes **Tested the distribution manifold and the fuel gas vented to the outside and blew down. Fire eyes were tested and alarmed as required. Gas detectors were tested and alarmed at 20% and shutdown at 40% as required. Ventilation fans operated.**
15. Question Result, ID, References **NA, FS.CSSYSROT.CMPFP.O, 192.171(a)**
 Question Text *Do compressor stations have adequate fire protection facilities?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
16. Question Result, ID, References **NA, FS.CSSYSROT.CMPGASDET.O, 192.736(a) (192.736(b))**
 Question Text *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
17. Question Result, ID, References **Sat, FS.CSSYSROT.CMPGASDET.O, 192.736(a) (192.736(b))**
 Question Text *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?*
 Assets Covered **Transmission 8052**
 Result Notes **Gas detectors were tested with calibrated 2.5% methane and functioned properly.**
18. Question Result, ID, References **Sat, FS.CSSYSROT.CMPLUBROT.O, 192.171(c)**
 Question Text *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication?*
 Assets Covered **Transmission 8052**
 Result Notes **Yes, per CNG employees.**
19. Question Result, ID, References **NA, FS.CSSYSROT.CMPLUBROT.O, 192.171(c)**
 Question Text *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
20. Question Result, ID, References **Sat, FS.CSSYSROT.CMPRELIEF.O, 192.199 (192.731(a), 192.731(b), 192.731(c))**
 Question Text *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly?*
 Assets Covered **Transmission 8052**
 Result Notes **Relief devices (2) were not tested. CNG removes the relief devices and installs 3rd party bench tested reliefs. One relief was in the storage shed. The tag was checked. Two operational relief devices were observed and tags were checked.**
21. Question Result, ID, References **NA, FS.CSSYSROT.CMPRELIEF.O, 192.199 (192.731(a), 192.731(b), 192.731(c))**
 Question Text *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
22. Question Result, ID, References **NA, FS.CSSYSROT.ESDGASBLK.O, 192.167(a)(1)**
 Question Text *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less.*
 Assets Covered **TIMP 8053**

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

23. Question Result, ID, References Sat, FS.CSSYSROT.ESDGASBLK.O, 192.167(a)(1)
Question Text *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less.*
Assets Covered Transmission 8052
Result Notes Yes, per CNG employees, not physically tested.
24. Question Result, ID, References NA, FS.CSSYSROT.ESDGASDISCH.O, 192.167(a)(2)
Question Text *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?*
Assets Covered TIMP 8053
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
25. Question Result, ID, References Sat, FS.CSSYSROT.ESDGASDISCH.O, 192.167(a)(2)
Question Text *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?*
Assets Covered Transmission 8052
Result Notes Yes. ESD's were not physically tested.
26. Question Result, ID, References NA, FS.CSSYSROT.ESDGASSD.O, 192.167(a)(3)
Question Text *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings?*
Assets Covered TIMP 8053
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
27. Question Result, ID, References Sat, FS.CSSYSROT.ESDGASSD.O, 192.167(a)(3)
Question Text *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings?*
Assets Covered Transmission 8052
Result Notes YES. Not tested because the compressor was idle.
28. Question Result, ID, References Sat, FS.CSSYSROT.ESDLOCATION.O, 192.167(a)(4)
Question Text *Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station?*
Assets Covered Transmission 8052
Result Notes Yes. There is a remote start and shutdown building at the front gate and CNG's gas control can also start and shutdown the station.
29. Question Result, ID, References NA, FS.CSSYSROT.ESDLOCATION.O, 192.167(a)(4)
Question Text *Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station?*
Assets Covered TIMP 8053
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
30. Question Result, ID, References NA, FS.CSSYSROT.CMPMAOP.O, 192.169(a)
Question Text *Do compressor stations have pressure relief or other suitable protective devices with sufficient capacity and sensitivity so as to protect station piping from exceed 110% of MAOP?*
Assets Covered TIMP 8053
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

31. Question Result, ID, References **Sat, FS.CSSYSROT.CMPMAOP.O, 192.169(a)**
 Question Text *Do compressor stations have pressure relief or other suitable protective devices with sufficient capacity and sensitivity so as to protect station piping from exceed 110% of MAOP?*
 Assets Covered **Transmission 8052**
32. Question Result, ID, References **NA, FS.CSSYSROT.RELIEFDISCH.O, 192.169(b)**
 Question Text *Do pressure relief valves exhaust gas to a location where the gas will not cause a hazard?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
33. Question Result, ID, References **Sat, FS.CSSYSROT.RELIEFDISCH.O, 192.169(b)**
 Question Text *Do pressure relief valves exhaust gas to a location where the gas will not cause a hazard?*
 Assets Covered **Transmission 8052**
 Result Notes **There are two relief valves ported through the roof and to the sides of the station.**
34. Question Result, ID, References **Sat, FS.CSSYSROT.CMPRELIEF.P, 192.605(b)(1) (192.731(a), 192.731(b), 192.731(c))**
 Question Text *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 742 section 8.1**

Reviewed the test procedure.
35. Question Result, ID, References **Sat, FS.CSSYSROT.CMPRELIEF.R, 192.709(b) (192.709(c), 192.731(a), 192.731(b), 192.731(c))**
 Question Text *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Reviewed annual maintenance documents for 2017, 2018 and 2019 for all 3 relief valves. (one valve is a spare)**
36. Question Result, ID, References **Sat, FS.CSSYSROT.CMPESDTEST.P, 192.605(b) (192.731(c))**
 Question Text *Does the process provide adequate detail for inspecting and testing compressor station emergency shutdown devices at the required frequency?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 742 section 8.1.3**
37. Question Result, ID, References **Sat, FS.CSSYSROT.CMPESDTESTDEV.R, 192.709(c) (192.731(c))**
 Question Text *Do records document the inspection and testing of all compressor station emergency shutdown devices at the required frequency?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Reviewed shutdown test records for 2017, 2018 and 2019.**
38. Question Result, ID, References **Sat, FS.CSSYSROT.CMPGASDETREQ.P, 192.605(b) (192.736(b))**
 Question Text *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings?*
 Assets Covered **TIMP 8053, Transmission 8052**
39. Question Result, ID, References **Sat, FS.CSSYSROT.CMPGASDETOM.P, 192.605(b) (192.736(c))**
 Question Text *Does the process give detail how gas detection and alarm systems in compressor stations will be maintained to function properly and do procedures require performance tests?*
 Assets Covered **TIMP 8053, Transmission 8052**

Result Notes Section 8.3.

Procedure requires 3% test gas

40. Question Result, ID, References **Sat, FS.CSSYSROT.CMPGASDETOM.R, 192.709(c) (192.736(c))**
Question Text *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Reviewed forms for 2017, 2018 and 2019.**

FS.CS: Compressor Stations

41. Question Result, ID, References **NA, FS.CS.BLDGLOC.O, 192.163(a) (192.163(b))**
Question Text *Are onshore compressor buildings located on property under the control of the operator?*
Assets Covered **TIMP 8053**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
42. Question Result, ID, References **Sat, FS.CS.BLDGLOC.O, 192.163(a) (192.163(b))**
Question Text *Are onshore compressor buildings located on property under the control of the operator?*
Assets Covered **Transmission 8052**
Result Notes **Yes. Completely enclosed in a chain link fence topped with barbed wire and inside a gated yard of a cogeneration plant.**
43. Question Result, ID, References **Sat, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b))** (also presented in: DC.COCMP, DC.COCMP)
Question Text *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?*
Assets Covered **Transmission 8052**
Result Notes **During this inspection combustibles (oils) were observed just outside the compressor building in 55 gallon drums. They are also in portable buildings in close proximity to the main compressor building. They also block part of the access needed for fire control equipment. CNG moved all combustibles away from the compressor building to the other side of the yard. Some of the drums were apparently empty and others were stored temporarily.**
44. Question Result, ID, References **NA, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b))** (also presented in: DC.COCMP, DC.COCMP)
Question Text *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?*
Assets Covered **TIMP 8053**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
45. Question Result, ID, References **NA, FS.CS.BLDGADJ.O, 192.163(a)**
Question Text *Are onshore main compressor buildings far enough from adjacent property to minimize the possibility of fire being conveyed to the compressor buildings from adjacent property?*
Assets Covered **TIMP 8053**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
46. Question Result, ID, References **Sat, FS.CS.BLDGADJ.O, 192.163(a)**
Question Text *Are onshore main compressor buildings far enough from adjacent property to minimize the possibility of fire being conveyed to the compressor buildings from adjacent property?*
Assets Covered **Transmission 8052**
47. Question Result, ID, References **NA, FS.CS.BLDGEXITS.O, 192.163(c)**
Question Text *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?*

Assets Covered TIMP 8053

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

48. Question Result, ID, References Sat, FS.CS.BLDGEXITS.O, 192.163(c)

Question Text *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?*

Assets Covered Transmission 8052

49. Question Result, ID, References Sat, FS.CS.BLDGSPACE.O, 192.163(a)

Question Text *Do onshore main compressor buildings have enough open space around them to allow for free movement of fire-fighting equipment.*

Assets Covered Transmission 8052

Result Notes The compressor yard is small and the building is offset towards the back right side. Piping would obstruct the back fenced in area from firefighting equipment. The compressor building would be easily accessible from outside the fenced area though. CNG is going to work with the fire department to determine if adequate pathways are available outside the fence area to control a fire. There is not enough room inside the fence area.

Update. The Fire Marshall conducted an inspection of the compressor station and is requiring two minor actions including an address at the station entrance and a fire department accessible lock on the gate. No other issues remain.

50. Question Result, ID, References NA, FS.CS.BLDGSPACE.O, 192.163(a)

Question Text *Do onshore main compressor buildings have enough open space around them to allow for free movement of fire-fighting equipment.*

Assets Covered TIMP 8053

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

51. Question Result, ID, References Sat, FS.CS.CMPNFPA70.O, 192.163(e)

Question Text *Does the equipment and wiring within compressor stations conform to National Electric Code, ANSI/NFPA 70, including the required posting or ready access of the permit?*

Assets Covered Transmission 8052

52. Question Result, ID, References NA, FS.CS.CMPNFPA70.O, 192.163(e)

Question Text *Does the equipment and wiring within compressor stations conform to National Electric Code, ANSI/NFPA 70, including the required posting or ready access of the permit?*

Assets Covered TIMP 8053

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

53. Question Result, ID, References NA, FS.CS.FENCEGATES.O, 192.163(d)

Question Text *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?*

Assets Covered TIMP 8053

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

54. Question Result, ID, References Sat, FS.CS.FENCEGATES.O, 192.163(d)

Question Text *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?*

Assets Covered Transmission 8052

Result Notes There are two main gates on the entrance side of the compressor yard. During our inspection one was unlocked and one was locked. There are no other exit points from the yard. CNG agreed to modify their O&M procedure to require that both gates be unlocked and openable from the inside while the yard is occupied.

55. Question Result, ID, References **Sat, FS.CS.BLDGCMBST.O, 192.163(b)**
 Question Text *Is each building on the compressor station site constructed of noncombustible materials if it contains either pipe that is more than 2 inches in diameter that contains gas under pressure or contains gas handling equipment other than gas utilization equipment used for station domestic purposes?*
 Assets Covered **Transmission 8052**
56. Question Result, ID, References **NA, FS.CS.BLDGCMBST.O, 192.163(b)**
 Question Text *Is each building on the compressor station site constructed of noncombustible materials if it contains either pipe that is more than 2 inches in diameter that contains gas under pressure or contains gas handling equipment other than gas utilization equipment used for station domestic purposes?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
57. Question Result, ID, References **Sat, FS.CS.CMPBLDGVENT.O, 192.173**
 Question Text *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas?*
 Assets Covered **Transmission 8052**
58. Question Result, ID, References **NA, FS.CS.CMPBLDGVENT.O, 192.173**
 Question Text *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
59. Question Result, ID, References **NA, FS.CS.CMPERP.O, 192.605(a) (192.615(b))**
 Question Text *Are emergency response plans for selected compressor stations kept on site?*
 Assets Covered **TIMP 8053**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
60. Question Result, ID, References **Sat, FS.CS.CMPERP.O, 192.605(a) (192.615(b))**
 Question Text *Are emergency response plans for selected compressor stations kept on site?*
 Assets Covered **Transmission 8052**
 Result Notes **Partial paper copies are posted on site and all employees have access to full emergency procedures through their laptops.**
61. Question Result, ID, References **Sat, FS.CS.CMPSUSD.P, 192.605(b)(5) (192.605(b)(7))**
 Question Text *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 742 section 8.8**
62. Question Result, ID, References **Sat, FS.CS.CMPMAINT.P, 192.605(b)(6)**
 Question Text *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 742 section 8.11**
63. Question Result, ID, References **Sat, DC.COCMP.CMPCOMBUSTIBLE.P, 192.303 (192.735(a), 192.735(b))** (also presented in: DC.COCMP)
 Question Text *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 742. Section 8.7.3**

64. Question Result, ID, References **NA, DC.COCMP.CMPCOMBUSTIBLE.R, 192.735(a) (192.735(b))** (also presented in: DC.COCMP)
 Question Text *As applicable to the project, are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **No such activity/condition was observed during the inspection.**

FS.VA: Valves

65. Question Result, ID, References **Sat, FS.VA.CMPVLVTEST.P, 192.605(b) (192.745(a), 192.745(b))**
 Question Text *Does the process have requirements for transmission line valves that might be used in an emergency?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 740 section 8.4**
66. Question Result, ID, References **Sat, FS.VA.CMPVLVTEST.R, 192.709(c) (192.745(a), 192.745(b))**
 Question Text *Do records adequately document that compressor transmission line valves have been inspected and partially operated at the correct interval?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Reviewed valve maintenance records for 2017, 2018 and 2019.**

IM.BA: Baseline Assessments

67. Question Result, ID, References **Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a), 192.921(c), 192.921(h))**
 Question Text *Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Section 5.1.2 and section 6. Internal and external corrosion are number one.**
68. Question Result, ID, References **Sat, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))**
 Question Text *Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Appendix E lists each segment and the assessment method and justification.**
69. Question Result, ID, References **Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))**
 Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Section 2.8**
70. Question Result, ID, References **Sat, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)**
 Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Appendix A records indicate that the updates are on-going.**
71. Question Result, ID, References **Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))**
 Question Text *Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Section 4.0.**

72. Question Result, ID, References **Sat, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d))**
Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Reviewed Table 5.2 which is a list of segments with HCA's and their assessment completion dates.**

IM.CA: Continual Evaluation and Assessment

73. Question Result, ID, References **Sat, IM.CA.LOWSTRESSREASSESS.P, 192.941(a) (192.941(b), 192.941(c))**
Question Text *Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Table 6.2. 2019 was the first year CNG used the low stress reassessment method.**
74. Question Result, ID, References **Sat, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a), 192.939(b), 192.913(c))**
Question Text *Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Table 6.2, Maximum Reassessment Interval matches 192.939 requirements.**
75. Question Result, ID, References **Sat, IM.CA.LOWSTRESSREASSESS.R, 192.947(d) (192.941(a), 192.941(b), 192.941(c))**
Question Text *Do records demonstrate that the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion is adequate and being performed as required?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **2019 was the first year a low stress reassessment method was used. It was performed on the 16-inch Fredonia line #14.**
76. Question Result, ID, References **Sat, IM.CA.PERIODICEVAL.P, 192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))**
Question Text *Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Section 4.2 documented on Form RA-2.**
77. Question Result, ID, References **Sat, IM.CA.PERIODICEVAL.R, 192.947(d) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e), 192.937(b))**
Question Text *Do records demonstrate that periodic evaluations of pipeline integrity have been performed based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Appendix A and also reviewed a sampling of Forms RA-2.**
78. Question Result, ID, References **Sat, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))**
Question Text *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Reviewed ECDA post assessment reports. 2005, 20012 and 2019. Next assessment is 2025.**
79. Question Result, ID, References **Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931)**
Question Text *Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?*
Assets Covered **TIMP 8053, Transmission 8052**
Result Notes **Section 6.8**
80. Question Result, ID, References **Sat, IM.CA.REASSESSMETHOD.R, 192.947(d) (192.937(c))**

Question Text *Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?*

Assets Covered **TIMP 8053, Transmission 8052**

Result Notes **Appendix a and Appendix E**

IM.HC: High Consequence Areas

81. Question Result, ID, References **Sat, IM.HC.HCAID.P, 192.905(a)**

Question Text *Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?*

Assets Covered **TIMP 8053, Transmission 8052**

Result Notes **CNG uses method 2. Section 2 of TIMP.**

82. Question Result, ID, References **Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a))**

Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*

Assets Covered **TIMP 8053, Transmission 8052**

Result Notes **CNG does an annual HCA evaluation per Section 2.3.**

83. Question Result, ID, References **Sat, IM.HC.HCAMETHOD2.P, 192.903(2)(i) (192.903(2)(ii))**

Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?*

Assets Covered **TIMP 8053, Transmission 8052**

Result Notes **Section 2. CNG uses method 2.**

84. Question Result, ID, References **Sat, IM.HC.HCANEW.P, 192.905(c)**

Question Text *Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?*

Assets Covered **TIMP 8053, Transmission 8052**

85. Question Result, ID, References **Sat, IM.HC.HCANEW.R, 192.947(d) (192.905(c))**

Question Text *Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?*

Assets Covered **TIMP 8053, Transmission 8052**

Result Notes **Section 2.10 and table 2.10.**

86. Question Result, ID, References **Sat, IM.HC.HCAPIR.P, 192.903 (192.905(a))**

Question Text *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?*

Assets Covered **TIMP 8053, Transmission 8052**

87. Question Result, ID, References **Sat, IM.HC.HCAPIR.R, 192.947(d) (192.903, 192.905(a))**

Question Text *Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?*

Assets Covered **TIMP 8053, Transmission 8052**

Result Notes **Appendix C lists the identified HCA's. The PIR's are listed in table 2.1.**

88. Question Result, ID, References **Sat, IM.HC.HCASITES.P, 192.903 (192.905(b))**

Question Text *Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?*

Assets Covered **TIMP 8053, Transmission 8052**

Result Notes **Section 2.6.1 and sections 2.4 and 2.10 are the continuing evaluations.**

89. Question Result, ID, References **Sat, IM.HC.HCASITES.R, 192.947(d) (192.903, 192.905(b))**
 Question Text *Do records indicate identification of identified sites being performed as required?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Reviewed a sampling of the annual HCA evaluation survey.**
90. Question Result, ID, References **Sat, IM.HC.HCAMETHOD2.R, 192.947(d) (192.905(a), 192.903(2)(ii))**
 Question Text *Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Yes.**
91. Question Result, ID, References **Sat, IM.HC.HCADATA.O, 192.905(c)**
 Question Text *Are HCAs correctly identified per up-to-date information?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Reviewed HCA's. Conducted field visits on the Attalia transmission pipeline to match up their designated HCA to the actual field conditions. .**

IM.PM: Preventive and Mitigative Measures

92. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.P, 192.935(a)**
 Question Text *Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Section 8. Table 8.1**
93. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a))**
 Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Section 8 and Table 8.1. Reviewed a sampling of Form P&M-2.**
94. Question Result, ID, References **Sat, IM.PM.PMMTPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))**
 Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*
 Assets Covered **TIMP 8053, Transmission 8052**
95. Question Result, ID, References **Sat, IM.PM.PMMTPD.R, 192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))**
 Question Text *Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Table 8-1 lists 3rd party under 9 through 16. CNG utilizes a required standby form Form 625. Reviewed a sampling of form 625 from actual 3rd party crossings.**
96. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.P, 192.915(c)**
 Question Text *Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **P&M #9 Table 8.1**
97. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.R, 192.947(e) (192.915(c))**

Question Text *Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Reviewed a sampling of OQ records for personnel who were involved in observing excavation work.

98. Question Result, ID, References Sat, IM.PM.PMMPDPSMYS.P, 192.935(d) (192.935(e), 192 Appendix E Table E.II.1)

Question Text *Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Table 8.1 P&M 15 and 16.

99. Question Result, ID, References Sat, IM.PM.PMMPDPSMYS.R, 192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)

Question Text *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Need to review leak surveys.

Reviewed a sampling of leak surveys as a preventative and mitigative measure. The Attalia line leak surveys as an example are conducted every 6 months. It operates at 28% SMYS.

100. Question Result, ID, References Sat, IM.PM.PMMPDPSMYS.P, 192.935(b)(2)

Question Text *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Table 8.1 P&M #17. This is not an issue and has never been identified as a threat.

101. Question Result, ID, References NA, IM.PM.PMMPDPSMYS.R, 192.947(d) (192.935(b)(2))

Question Text *Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

IM.QA: Quality Assurance

102. Question Result, ID, References Sat, IM.QA.QARM.P, 192.911(l)

Question Text *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Section 9.0 Quality Control. Table 9.1.

103. Question Result, ID, References Sat, IM.QA.IMNONMANDT.P, 192.7(a)

Question Text *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes B31.8S requires annually this is found in 4.2 of the TIMP. 4.3.

104. Question Result, ID, References Sat, IM.QA.IMPERSONNEL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b)(1)(i), 192.907(b))

Question Text *Does the process include requirements to assure personnel involved in the integrity management program are qualified for their assigned responsibilities in accordance with the quality control plan and Part 192?*

Assets Covered TIMP 8053

Result Notes Field personnel are qualified through the OQ plan. Personnel that oversee the TIMP plan meet the minimum qualifications outlined in Table 1.1 but are not qualified through the OQ plan since they are not performing covered tasks.

105. Question Result, ID, References Sat, IM.QA.IMPERSONNEL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c))
 Question Text *Do records demonstrate that personnel involved in the integrity management program are qualified for their assigned responsibilities?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Field personnel are qualified through the OQ plan. Personnel that oversee the TIMP plan meet the minimum qualifications outlined in Table 1.1 but are not qualified through the OQ plan since they are not performing covered tasks.
106. Question Result, ID, References Sat, IM.QA.QARM.R, 192.947(d) (192.911(l))
 Question Text *Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Reviewed their QC audit from 2019. These audits are done annually.
107. Question Result, ID, References Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))
 Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Section 14. Reviewed a sampling of records. BAP annual update form as an example. Dated back to 2014. Performance Metrics only to 2017. This was noted in a previous inspection.

 Reviewed a sampling of required records. One was only back to 2017 but this was identified in a 2017 inspection by the UTC.
108. Question Result, ID, References Sat, IM.QA.IMMOC.P, 192.911(k) (192.909(a), 192.909(b))
 Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Section 11.0. MOC Form 530. Reviewed a sampling of MOC forms.
109. Question Result, ID, References Sat, IM.QA.IMMOC.R, 192.947(d) (192.909(a), 192.909(b), 192.911(k))
 Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Reviewed MOC forms. (Sampling) no issues.
110. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.P, 192.945(a) (192.913(b), 192.951)
 Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Section 10 and Table 10.1
111. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.R, 192.947(d) (192.913(b), 192.945(a), 192.951)
 Question Text *Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Reviewed various matrix trackers taken from table 10.1. .
112. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b), 192.951)
 Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*
 Assets Covered TIMP 8053, Transmission 8052
 Result Notes Table 10.1
113. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b), 192.945(a), 192.951)

Question Text *Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Reviewed a listing of failures from 2013 to 2018. The number of HCA's is trending downward as the MAOP validation issue is remediated.

114. Question Result, ID, References Sat, IM.OA.RECORDS.R, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))

Question Text *Are required records being maintained for the life of the pipeline?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes A sampling of records were reviewed. Good.

IM.RA: Risk Analysis

115. Question Result, ID, References Sat, IM.RA.RADATA.P, 192.917(b) (192.917(e)(1), 192.911(k))

Question Text *Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Section 4.3.1

116. Question Result, ID, References Sat, IM.RA.RAMETHOD.P, 192.917(c) (192.917(d))

Question Text *Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Section 4.6.1. Appendix A.

117. Question Result, ID, References Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))

Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Reviewed Appendix A and Appendix E. All threats appear to have been evaluated for each segment and integrated into their TIMP.

118. Question Result, ID, References Sat, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(e)(1), 192.911(k))

Question Text *Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Appendix A. Reviewed a sampling of evaluations showing entire segments are reviewed and data integrated.

119. Question Result, ID, References Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e), 192.913(b)(1))

Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Section 5.1.2

120. Question Result, ID, References Sat, IM.RA.RAMETHOD.R, 192.947(b) (192.917(c), 192.917(d))

Question Text *Do records demonstrate that the risk assessment follows ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Appendix A.

121. Question Result, ID, References Sat, IM.RA.RAMOC.P, 192.917(c)

Question Text *Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?*

Assets Covered TIMP 8053, Transmission 8052
Result Notes Section 4.3. Reviewed the RA-4 BAP annual update form.

122. Question Result, ID, References Sat, IM.RA.RAMOC.R, 192.947(b) (192.917(c))
Question Text *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes Reviewed form RA-4 Annual BAP update.

MO.GM: Gas Pipeline Maintenance

123. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))
Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes Reviewed valve records for 2017, 2018 and 2019.
124. Question Result, ID, References NA, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))
Question Text *Are field inspection and partial operation of transmission line valves adequate?*
Assets Covered TIMP 8053
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
125. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))
Question Text *Are field inspection and partial operation of transmission line valves adequate?*
Assets Covered Transmission 8052
Result Notes Transmission valves were observed being partially operated.

MO.GOODOR: Gas Pipeline Odorization

126. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))
Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes CNG is unable to separate out transmission from distribution odorization records. We reviewed the entire Kennewick district records which includes both dist and trans. No issues.
127. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.O, 192.625(f)
Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*
Assets Covered Transmission 8052
Result Notes An odorization test was performed on the Fredonia 16-inch transmission line. The readily detectible level was 0.5%.
128. Question Result, ID, References NA, MO.GOODOR.ODORIZE.O, 192.625(f)
Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*
Assets Covered TIMP 8053
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GO: Gas Pipeline Operations

129. Question Result, ID, References Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))

Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes CP 635 section 8.4

130. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))
Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GMOPP: Gas Pipeline Overpressure Protection

131. Question Result, ID, References Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))
Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes Reviewed the engineering check for all regulator stations in all districts. Done annually as required. No issues.

132. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))
Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes Reviewed regulator station records for the Bellingham and Aberdeen districts. CNG personnel state these are the only districts that have exclusively transmission regulator stations. Records were for 2018 and 2019 maintenance of stations no issues.

133. Question Result, ID, References NA, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)
Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes No such event occurred, or condition existed, in the scope of inspection review. No field bench tests performed, only on site operational tests.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

134. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered TIMP 8053, Transmission 8052
Result Notes Reviewed patrol records on a sampling basis. Verified OQ records for patrol personnel. All patrols were performed 4 times per year and OQ's were good.

135. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW, PD.RW)
Question Text *Are line markers placed and maintained as required?*
Assets Covered Transmission 8052

136. Question Result, ID, References NA, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW, PD.RW)
Question Text *Are line markers placed and maintained as required?*
Assets Covered TIMP 8053
Result Notes No such activity/condition was observed during the inspection.

137. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)
Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 610

138. Question Result, ID, References Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))

Question Text *Do records indicate leakage surveys conducted as required?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Reviewed a sampling of leak survey records. Leak surveys are conducted 2X per year NTE 7.5 months. We looked the Attalia transmission system for 2017, 2018 and 2019. No issues.

Leak survey records were reviewed on a sampling basis. Mount Vernon District records were 100% reviewed for 2017, 18 and 19

PD.RW: ROW Markers, Patrols, Monitoring

139. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Reviewed patrol records on a sampling basis. Verified OQ records for patrol personnel. All patrols were performed 4 times per year and OQ's were good.

140. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW, MO.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered Transmission 8052

141. Question Result, ID, References NA, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW, MO.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered TIMP 8053

Result Notes No such activity/condition was observed during the inspection.

142. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 610

RPT.NR: Notices and Reporting

143. Question Result, ID, References Sat, RPT.NR.NOTIFYOQ.P, 192.805(i)

Question Text *Does the OQ Program require the Administrator or state agency to be notified if the operator significantly modifies its program?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 800 section 3.3.8.

144. Question Result, ID, References Sat, RPT.NR.NOTIFYOQ.R, 192.805(i)

Question Text *Do records indicate the Administrator or state agency was notified when the OQ Program was significantly modified?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes When CNG changed from MEA to EnergyWorldNet they notified PHMSA and the WA UTC of the major modification and have a record of the notice.

145. Question Result, ID, References Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b)

Question Text *Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes [Section 11.1.](#)

146. Question Result, ID, References [Sat, RPT.NR.NOTIFYIMCHANGE.R, 192.947\(i\) \(192.909\(b\)\)](#)
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [Reviewed a record of Major changes back to 2013.](#)
147. Question Result, ID, References [Sat, RPT.NR.NOTIFYIMPRESS.P, 192.933\(a\)\(1\)](#)
Question Text *Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [Section 7.5](#)
148. Question Result, ID, References [NA, RPT.NR.NOTIFYIMPRESS.R, 192.947\(i\) \(192.933\(a\)\(1\)\)](#)
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
149. Question Result, ID, References [Sat, RPT.NR.IMDEVIATERPT.P, 192.913\(b\)\(1\)\(vii\)](#)
Question Text *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [Section 13](#)
150. Question Result, ID, References [NA, RPT.NR.IMDEVIATERPT.R, 192.947\(i\) \(192.913\(b\)\(1\)\(vii\)\)](#)
Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
151. Question Result, ID, References [Sat, RPT.NR.IMPERFRPT.P, 192.947\(i\) \(192.945\(a\), 191.17, ASME B31.8S-2004 Appendix A Section 9.8\)](#)
Question Text *Is there a process for annual reporting of integrity management performance data?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [Section 10.4.](#)
152. Question Result, ID, References [Sat, RPT.NR.IMPERFRPT.R, 192.947\(i\) \(192.945\(a\), 191.17, ASME B31.8S-2004 Appendix A Section 9.8\)](#)
Question Text *Do annual reports demonstrate that integrity management performance data were reported?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [PPR reports were reviewed.](#)

RPT.RR: Regulatory Reporting (Traditional)

153. Question Result, ID, References [Sat, RPT.RR.ANNUALREPORT.R, 191.17\(a\)](#)
Question Text *Have complete and accurate Annual Reports been submitted?*
Assets Covered [TIMP 8053, Transmission 8052](#)
Result Notes [Annual reports were reviewed.](#)

154. Question Result, ID, References **Sat, RPT.RR.IMMEDREPORT.P, 191.5(b) (191.7)**
 Question Text *Is there a process to immediately report incidents to the National Response Center?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **OPS 9 section 3.3.**
155. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))**
 Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No required NRC reports on Transmission**
156. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)**
 Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
157. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORT.R, 191.15(a)**
 Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 within the required timeframe?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
158. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORT.P, 191.15(a)**
 Question Text *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **OPS 9 section 3.7**
159. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORTSUPP.P, 191.15(d)**
 Question Text *Does the process require preparation and filing of supplemental incident reports?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **OPS 9 section 3.7.1**
160. Question Result, ID, References **Sat, RPT.RR.SRCR.P, 192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(b))**
 Question Text *Do processes require reporting of safety-related conditions?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **OPS 9 section 7**
161. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b))**
 Question Text *Do records indicate safety-related condition reports were filed as required?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
162. Question Result, ID, References **Unsat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))**
 Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*
 Assets Covered **Transmission 8052**
 Result Issue Summary **Cascade Natural Gas (CNG) has a segment of transmission pipeline between their Shelton Gate Station and Bremerton transmission pipeline that was not submitted to the NPMS as required. The segment consists of approximately 3.8 miles of 12.75-inch, X-52, 0.375-inch wt pipeline**

with an MAOP of 499 psig. The pipeline operates at approximately 16.31% of the specified minimum yield strength (SMYS).

Since this pipeline operates below 20% of the SMYS, CNG classifies it as high pressure distribution. Although the pipeline operates below 20% of the SMYS, we believe it meets the functional definition of transmission found in 49 CFR §192.3(1) and a previous PHMSA interpretation on the definition of transmission for a similar system appears to support this opinion.[1]

[1] Interpretation 192.3 (Transmission Line) 46, dated September 27, 2018

49 CFR §192.3(1)

Cascade Nat Gas has misinterpreted the definition of transmission. They only use 20% SMYS as the defining method of determining if a pipeline is transmission. They do not use the functional definition. In this case they have a segment of pipeline tied into transmission at each end and providing the sole supply for a transmission pipeline yet it is defined as high pressure distribution.

Standard Issues B2 (Moderate or small impact/limited occurrence) : 191.29(a) : Issue not covered in standard items. See Issue Summary text for details.
B2 (Moderate or small impact/limited occurrence) : 192.3 : Issue not covered in standard items. See Issue Summary text for details.

Result Notes Cascade Natural Gas (CNG) has a segment of transmission pipeline between their Shelton Gate Station and Bremerton transmission pipeline that was not submitted to the NPMS as required. The segment consists of approximately 3.8 miles of 12.75-inch, X-52, 0.375-inch wt pipeline with an MAOP of 499 psig. The pipeline operates at approximately 16.31% of the specified minimum yield strength (SMYS).

Since this pipeline operates below 20% of the SMYS, CNG classifies it as high pressure distribution. Although the pipeline operates below 20% of the SMYS, we believe it meets the functional definition of transmission found in 49 CFR §192.3(1) and a previous PHMSA interpretation on the definition of transmission for a similar system appears to support this opinion.[1]

[1] Interpretation 192.3 (Transmission Line) 46, dated September 27, 2018

163. Question Result, ID, References Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))

Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*

Assets Covered TIMP 8053

Result Notes Reviewed NPMS submittals on a sampling basis. Verified that the MAOP validation transmission lines are submitted.

164. Question Result, ID, References Sat, RPT.RR.OPID.P, 191.22(a) (191.22(c), 191.22(d))

Question Text *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes OPS 9 section 3.3.3. OP ID 2128.

165. Question Result, ID, References Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))

Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered [TIMP 8053](#), [Transmission 8052](#)

Result Notes [Op ID 2128](#)

TD.ATM: Atmospheric Corrosion

166. Question Result, ID, References [NA](#), [TD.ATM.ATMCORRODEINSP.O](#), [192.481\(b\)](#) ([192.481\(c\)](#), [192.479\(a\)](#), [192.479\(b\)](#), [192.479\(c\)](#))

Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered [TIMP 8053](#)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

167. Question Result, ID, References [Sat](#), [TD.ATM.ATMCORRODEINSP.O](#), [192.481\(b\)](#) ([192.481\(c\)](#), [192.479\(a\)](#), [192.479\(b\)](#), [192.479\(c\)](#))

Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered [Transmission 8052](#)

Result Notes [No atmospheric corrosion noted during field facility inspections.](#)

168. Question Result, ID, References [Sat](#), [TD.ATM.ATMCORRODEINSP.R](#), [192.491\(c\)](#) ([192.481\(a\)](#), [192.481\(b\)](#), [192.481\(c\)](#))

Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*

Assets Covered [TIMP 8053](#), [Transmission 8052](#)

Result Notes [Records were reviewed on a sampling basis. Regulator station maintenance records were reviewed and atmospheric corrosion records were good.](#)

TD.CPMONITOR: External Corrosion - CP Monitoring

169. Question Result, ID, References [Sat](#), [TD.CPMONITOR.CURRENTTEST.R](#), [192.491\(c\)](#) ([192.465\(b\)](#))

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered [TIMP 8053](#), [Transmission 8052](#)

Result Notes [Reviewed rectifier records on a sampling basis. The entire Kennewick district records were reviewed for 2019. All rectifiers were checked 6X per year NTE 2.5 months and CP levels were adequate.](#)

170. Question Result, ID, References [Sat](#), [TD.CPMONITOR.TEST.R](#), [192.491\(c\)](#) ([192.465\(a\)](#))

Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered [TIMP 8053](#), [Transmission 8052](#)

Result Notes [Annual test sites were reviewed on a sampling basis](#)

171. Question Result, ID, References [Sat](#), [TD.CPMONITOR.CURRENTTEST.O](#), [192.465\(b\)](#)

Question Text *Are impressed current sources properly maintained and are they functioning properly?*

Assets Covered [Transmission 8052](#)

Result Notes [All CP reads observed and rectifiers observed were good.](#)

172. Question Result, ID, References [NA](#), [TD.CPMONITOR.CURRENTTEST.O](#), [192.465\(b\)](#)

Question Text *Are impressed current sources properly maintained and are they functioning properly?*

Assets Covered [TIMP 8053](#)

Result Notes [No such activity/condition was observed during the inspection.](#)

173. Question Result, ID, References [NA](#), [TD.CPMONITOR.REVCURRENTTEST.R](#), [192.491\(c\)](#) ([192.465\(c\)](#))

Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*

Assets Covered [TIMP 8053](#), [Transmission 8052](#)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

174. Question Result, ID, References **Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))**
 Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Boise Cascade isolated in 2018 not isolated in 2019. Appears to have been read in the wrong spot. Verified with CP tech.**
175. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))**
 Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 755. CP records were reviewed on a sampling basis. No stray current issues were observed on records.**

TD.CP: External Corrosion - Cathodic Protection

176. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))**
 Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **See Boise Cascade isolation issue. This meter set was read in the wrong location which appeared to indicate an isolation issue. No issues noted and isolation was verified to be good.**

TD.CPEXPOSED: External Corrosion - Exposed Pipe

177. Question Result, ID, References **Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)**
 Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP form 625. Reviewed a sampling of Integrity Management Dig Reports. All reports were good with thorough documentation of pipe conditions both internal and external.**
178. Question Result, ID, References **Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c))**
 Question Text *Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 755 section 8.4.2.1. Section 8.4.2.3 requires B31G or RSTRENG.**
179. Question Result, ID, References **NA, TD.CPEXPOSED.EXTCORRODEEVAL.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c))**
 Question Text *Do records adequately document the evaluation of externally corroded pipe?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
180. Question Result, ID, References **Sat, TD.CPEXPOSED.EXTCORRODREPAIR.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c))**
 Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 755 8.4.2.3**
181. Question Result, ID, References **NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c))**
 Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.ICP: Internal Corrosion - Preventive Measures

182. Question Result, ID, References Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b))

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 755 8.3.6

183. Question Result, ID, References Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Recorded on Form 625. Reviewed a sampling of 625's, no issues and well documented.

184. Question Result, ID, References Sat, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.485(c))

Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 755 8.3.6 requires Engineering Services evaluation.

185. Question Result, ID, References NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))

Question Text *Do records document adequate evaluation of internally corroded pipe?*

Assets Covered TIMP 8053

Result Notes No such event occurred, or condition existed, in the scope of inspection review. CNG personnel state they have not experienced any internal corrosion issues.

186. Question Result, ID, References Sat, TD.ICP.REPAIR.P, 192.491(c) (192.485(a), 192.485(b))

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 755 8.3.3. Requires engineering services process.

187. Question Result, ID, References NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))

Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes No such event occurred, or condition existed, in the scope of inspection review. CNG personnel state they have not experienced any internal corrosion issues.

TQ.QU: Qualification of Personnel - Specific Requirements

188. Question Result, ID, References Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))

Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 755

All CP personnel work under a CP manager and all CP personnel are OQ qualified. CP managers are 4 year degree'd or NACE.

189. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*
Assets Covered TIMP 8053, Transmission 8052

190. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))

Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*

Assets Covered TIMP 8053, Transmission 8052
Result Notes CP 630.

191. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.R, 192.627 (192.807(a), 192.807(b))

Question Text *Do records indicate the qualification of personnel performing hot taps?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Reviewed records for CNG's 8" Whatcom job and verified that the 8" taps were performed by a qualified Hot Tap person. Verified through EnergyWorldNet scan of the barcode.

192. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.O, 192.627 (192.805(h))

Question Text *Do personnel performing hot taps demonstrate adequate skills and knowledge?*

Assets Covered TIMP 8053

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

193. Question Result, ID, References NA, TQ.QU.HOTTAPQUAL.O, 192.627 (192.805(h))

Question Text *Do personnel performing hot taps demonstrate adequate skills and knowledge?*

Assets Covered Transmission 8052

Result Notes No such activity/condition was observed during the inspection. No hot taps were observed. Records indicate that persons designated as hot tap qualified passed CNG's OQ testing requirements.

194. Question Result, ID, References Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-06-01, 192.801, 192.328)

Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes OPS 800 4 Performing Coverd tasks

195. Question Result, ID, References Sat, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-06-01, 192.801, 192.328)

Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes Reviewed a job record for the Whatcom 8" HP line and the personnel reviewed were qualified in trenching, shoring, backfilling and locating.

196. Question Result, ID, References NA, TQ.QU.EXCAVATE.O, 192.805(b) (192.805(h), ADB-06-01, 192.801(a), 192.328(a), 192.328(c))

Question Text *Do individuals who oversee marking, trenching, and backfilling operations demonstrate adequate skills and knowledge?*

Assets Covered Transmission 8052

Result Notes No such activity/condition was observed during the inspection. Not observed during this transmission inspection.

197. Question Result, ID, References NA, TQ.QU.EXCAVATE.O, 192.805(b) (192.805(h), ADB-06-01, 192.801(a), 192.328(a), 192.328(c))

Question Text *Do individuals who oversee marking, trenching, and backfilling operations demonstrate adequate skills and knowledge?*

Assets Covered TIMP 8053

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

198. Question Result, ID, References **Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b))**
 Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Table 1.1**
199. Question Result, ID, References **Sat, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))**
 Question Text *Do records indicate adequate qualification of integrity management personnel?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Reviewed OQ records on a sampling basis.**
200. Question Result, ID, References **Sat, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))**
 Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **RQC plan calls for qualified and competent personnel in all aspects of TIMP.**

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

201. Question Result, ID, References **Sat, TQ.QUOMCONST.INSPECTOR.P, 192.241(a) (192.241(c), 192.805(b), 192.328(a), 192.328(b))**
 Question Text *Does the process require welding inspection personnel to be adequately trained and qualified?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CNG;'s welders are trained to inspect their own welds.**
CP 760 8.7 requires them to be trained by experience and procedure.
202. Question Result, ID, References **Sat, TQ.QUOMCONST.INSPECTOR.R, 192.241(a) (192.241(c), 192.807(a), 192.807(b))**
 Question Text *Do records indicate adequate qualification documentation for personnel who conduct welding inspections?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Welders are qualified to inspect their own welds. All OQ tasks reviewed for welders were documented and employees qualified.**
203. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTOR.O, 192.241(a) (192.241(c))**
 Question Text *Does the welding inspector demonstrate adequate skills and knowledge?*
 Assets Covered **Transmission 8052**
 Result Notes **No such activity/condition was observed during the inspection. No welding observed during this inspection.**
204. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTOR.O, 192.241(a) (192.241(c))**
 Question Text *Does the welding inspector demonstrate adequate skills and knowledge?*
 Assets Covered **TIMP 8053**
 Result Notes **No such activity/condition was observed during the inspection.**
205. Question Result, ID, References **Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**
 Question Text *Do records indicate the qualification of nondestructive testing personnel?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Reviewed a sampling of CNG job books where NDT was done. CNG uses contractors for NDT. MISTRAS. Reviewed the NDT personnel certification. #EID 504408.**

206. Question Result, ID, **Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**
 Question Text *Do records indicate that welders are adequately qualified?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **Welders reviewed were OQ qualified.**
207. Question Result, ID, **Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 192.805(b))**
 Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 760 requires all API 1104 8.13.**
208. Question Result, ID, **NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))**
 Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No Appendix C welders. Everything is API 1104.**
209. Question Result, ID, **NA, TQ.QUOMCONST.WELDER.O, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.803, 192.328(a), 192.328(b))**
 Question Text *Do welders demonstrate adequate skills and knowledge?*
 Assets Covered **Transmission 8052**
 Result Notes **No such activity/condition was observed during the inspection. No welding observed during this inspection.**
210. Question Result, ID, **NA, TQ.QUOMCONST.WELDER.O, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.803, 192.328(a), 192.328(b))**
 Question Text *Do welders demonstrate adequate skills and knowledge?*
 Assets Covered **TIMP 8053**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
211. Question Result, ID, **Sat, TQ.QUOMCONST.NDT.P, 192.243(b)(2) (192.803, 192.805(b), 192.805(h), 192.328(a), 192.328(b))**
 Question Text *Does the process require nondestructive testing of welds performed by personnel trained and qualified in processes and in use of the testing equipment?*
 Assets Covered **TIMP 8053, Transmission 8052**
 Result Notes **CP 760 8.8**
212. Question Result, ID, **NA, TQ.QUOMCONST.NDT.O, 192.243(b)(2) (192.803, 192.328(a), 192.328(b))**
 Question Text *Do nondestructive testing personnel demonstrate adequate skills and knowledge?*
 Assets Covered **TIMP 8053**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
213. Question Result, ID, **NA, TQ.QUOMCONST.NDT.O, 192.243(b)(2) (192.803, 192.328(a), 192.328(b))**
 Question Text *Do nondestructive testing personnel demonstrate adequate skills and knowledge?*
 Assets Covered **Transmission 8052**
 Result Notes **No such activity/condition was observed during the inspection. No NDT observed during this inspection.**

TQ.TR: Training of Personnel

214. Question Result, ID, **Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))**
 Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*
 Assets Covered **TIMP 8053, Transmission 8052**

Result Notes CP 925 4.4 MDU form 20231 attendance sheets are used and CNG form 522 to document training activity. 4.3 requires 2X training per year.

215. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text *Is training for emergency response personnel documented?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 925 4.4 MDU form 20231 attendance sheets are used and CNG form 522 to document training activity. Reviewed training documentation for 2018 and 2019

216. Question Result, ID, References Sat, TQ.TR.TRAINING.O, 192.615(b)(2) (192.805(b))

Question Text *Do emergency response personnel demonstrate adequate skills and knowledge?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 925 4.4 MDU form 20231 attendance sheets are used and CNG form 522 to document training activity. Training records were reviewed.

217. Question Result, ID, References Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)

Question Text *Does the process require review of emergency response personnel performance?*

Assets Covered TIMP 8053, Transmission 8052

Result Notes CP 925 8.24.1

Report Parameters: Results: all

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