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

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

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

Inspection Report			
Inspection ID/Docket Number	8141		
Inspector Name & Submit Date	Dave Cullom 6/26/2020		
Sr. Eng Name & Review/Date	Joe Subsits, 7/1/2020		
Operator Information			
Name of Operator:	Solvay Chemicals, Inc.	**OP ID #:**	32399
Name of Unit(s):	Headquarters		
Records Location:	Longview, WA (Remote inspection)		
Date(s) of Last Review:	July 30-31, 2018	**Inspection Date**	6/16/2020 - 6/17/2020

Inspection Summary:

No probable violations or areas of concern.

Procedure questions that were deferred to this inspection in the 2020 IA Field and Records Review were revisited. Leak surveys, due to un-odorized gas, are done every month. Pipeline patrols are done every two months.

The operator made the following changes to their manual due to being reclassified as a transmission line.

Changed Axiall to Westlake
6.0 System description: changed to Transmission line.
7.1 Table updated with transmission and NPMS
§ 191.15 – Transmission Systems: Incident Report
§ 191.17 – Transmission systems; gathering systems;
liquefied natural gas facilities; and underground natural gas
storage facilities: Annual report
§ 191.29 – National Pipeline Mapping System
§ 192.150 – Instrumented internal inspection devices
§ 192.307 – Inspection of materials.
§ 192.485 – Remedial measures: Transmission lines
§ 192.705 – Transmission lines: Patrolling
§ 192.706 – Transmission lines: Leakage surveys

HQ Address:		**System/Unit Name & Address:**	
333 Richmond Ave Houston, TX 77098		3500 Industrial Way Longview, WA 98632-9482	
Co. Official:	Robert May	**Phone No.:**	N/A
Phone No.:	No phone number on file	**Fax No.:**	N/A
Fax No.:		**Emergency Phone No.:**	(360) 636-7796

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Emergency Phone No.:		N/A
Persons Interviewed	**Title**	**Phone No.**
Pascal Mansy	Engineering & Maintenance Manager	360-577-7800

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GAS SYSTEM OPERATIONS		
Gas Supplier		
Operating Pressure(s):	**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:	150 psig	This was a procedure review ~60 psig
Town:		
Other:		
Does the operator have any transmission pipelines? Yes		

Pipe Specifications:			
Year Installed (Range)	2006	Pipe Diameters (Range)	6.625
Material Type	Steel	Line Pipe Specification Used	API5L
Mileage	.091 mi – 481ft	SMYS %	~5.1% using Grade B per operator calcs – MTR States X42/52

49 CFR PART 191 & CHAPTER 480-93 WAC

		REPORTING PROCEDURES	S	U	N/A	N/C
1.	480-93-180 (1)	Immediate Notice of certain incidents to **NRC (800) 424-8802,** or electronically at http://www.nrc.uscg.mil/nrchp.html, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). .191.5 *****Notes – This is in Section 7.1*****	X			
2.		Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline unless an alternative reporting method is authorized IAW with paragraph (d) of this section. (Amdt. 191-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). 191.7*****Notes – This is on Pg.9*****	X			
3.		Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9144** (Within **2 hours**) for events which; 480-93-200(1)				
4.		(a) Results in a fatality or personal injury requiring hospitalization; *****Notes – This is in Attachment E*****	X			
5.		(b) Results in damage to the property of the operator and others of a combined total exceeding fifty thousand dollars; *****Notes – This is in Attachment E*****	X			
6.		(c) Results in the evacuation of a building, or high occupancy structures or areas*****Notes – This is in Attachment E*****	X			
7.		(d) Results in the unintentional ignition of gas; *****Notes – This is in Attachment E*****	X			
8.		(e) Results in the unscheduled interruption of service furnished by any operator to twenty-five or more distribution customers; *****Notes – This is a transmission system *****			X	
9.		(f) Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; *****Notes – This is in Attachment E*****	X			
10.		g) Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or*****Notes – This is in Attachment E*****	X			
11.		Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within **24 hours**) for; 480-93-200(2)				
12.		(a) The uncontrolled release of gas for more than two hours; *****Notes – This is in Attachment E*****	X			
13.		b) The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; *****Notes – This pipeline is for Solvay's sole use only. No downstream customers.*****			X	

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		REPORTING PROCEDURES	S	U	N/A	N/C
14.	480-93-180 (1)	(c) A pipeline or system operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or*****Notes – This pipeline is for Solvay's sole use only. No downstream customers.*****			X	
15.		(d) A pipeline or system pressure exceeding the MAOP. *****Notes – This is in Attachment E*****	X			
16.		30 day written incident (federal) reports; (DOT Form F 7100.1) 191.9(a) For Transmission & Gathering Lines; (DOT Form F 7100.2) 191.15(a)30-day follow-up written report Submittal must be electronically to http://portal.phmsa.dot.gov/pipeline (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). *****Notes – This is in Attachment E and Table 7.1 – Summary of Required Reports*****	X			
17.		Supplemental incident reports 191.15(c) *****Notes – This is on Pg. 9*****	X			
18.		Written incident reports **filed with the commission** (within 30 days); and include the following; 480-93-200(4) (a) thru (g) *****Notes – This is in Table 7.1 – Summary of Required Reports*****	X			
19.	480-93-180 (1)	Supplemental reports **filed with the commission** 480-93-200(5) *****Notes – This is on Pg. 10 Item (5)*****	X			
20.	480-93-180 (1)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure 480-93-200(6) *****Notes – This is on Pg. 10 Item (6)*****	X			
21.		Annual Report (DOT Form PHMSA F-7100.2-1) For Transmission & Gathering 191.17(a) Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(NOTE: June 15, 2013 for the year 2012).* *****Notes – This is on Pg. 12*****	X			
22.	480-93-180 (1)	**Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)** (Via the commission's Virtual DIRT system or on-line damage reporting form) 480-93-200(7)				
23.		Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) 480-93-200(7)(a) *****Notes – This is on Pg. 10 Item (7a)*****	X			
24.		Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed? 480-93-200(7)(b) *****Notes – This is on Pg. 10 Item (7b)*****	X			
25.		Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? 480-93-200(7)(c) **Note:** Records maintained for two years and made available to the commission upon request. *****Notes – This is on Pg. 10 Item (7c)*****	X			
26.		Does the operator provide the following information to excavators who damage gas pipeline facilities? 480-93-200(8)				
27.		• Notification requirements for excavators under RCW 19.122.050(1) 200(8)(a) *****Notes – This is on Pg. 11 Item (7a)*****	X			
28.		• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 200(8)(b) *****Notes – This is on Pg. 11 Item (8b)*****	X			
29.		• Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. 200(8)(c) *****Notes – This is on Pg. 10 Item (8c)*****	X			
30.		**Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities…** • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a) • A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) *****Notes – This is on Pg. 11 Item (9a and 9b)*****	X			
		Annual Reports **filed with the commission** no later than March 15 for the proceeding calendar year 480-93-200(10) *****Notes – This is in Table 7.1 – Summary of Required Reports*****				

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		REPORTING PROCEDURES	S	U	N/A	N/C
31.	480-93-180 (1)	A copy of PHMSA form F-7100.1-1 or F-7100.2-1 annual report required by the PHMSA/OPS 480-93-200(10)(a) *****Notes – This is in Table 7.1 – Summary of Required Reports*****	X			
32.		Annual report on construction defects or material failures 480-93-200(10)(b) *****Notes – This is in Table 7.1 – Summary of Required Reports*****	X			
33.		Providing updated emergency contact information to the Commission and appropriate officials 480-93-200(11) *****Notes – This is on Pg. 11 Item (11)*****	X			
34.		Providing daily construction and repair activities reports 480-93-200(12) *****Notes – This is on Pg. 11 Item (11)*****	X			
35.		Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form (when required) 480-93-200(13) *****Notes – This is on Pg. 11 Item (13)*****	X			
36.		Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline 191.22 *****Notes – The operator has already obtained an OPID*****	X			
37.		Safety related condition reports (SRCR) 191.23*****Notes – This is on Pg. 12*****	X			
38.		Filing the SRCR within 5 days of determination, but not later than 10 days after discovery 191.25; 49 U.S.C. 60139, Subsection (b)(2) **Note:** Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA **on or before the fifth day** following the date on which the exceedance occurs. The report should be titled "Gas Transmission MAOP Exceedance" and provide the following information: • The name and principal address of the operator, date of the report, name, job title, and business telephone number of the person submitting the report. • The name, job title, and business telephone number of the person who determined the condition exists. • The date the condition was discovered and the date the condition was first determined to exist. • The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored. The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action. *****Notes – This is on Pg. 13*****	X			
39.	192.605(d)	Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions? *****Notes – This is covered in the OQ covered tasks and maintenance inspection lists and annual employee reviews*****	X			

	Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002		S	U	N/A	N/C
	49 U.S.C. 60132, Subsection (b) **ADB-08-07**	Updates to NPMS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to http://www.npms.phmsa.dot.gov/submission/ to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates. ******Notes - https://www.npms.phmsa.dot.gov/OSAVE/ is the new address. This will be added to the O&M review or PM. No procedure required under USC 60132 ******	X			

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		Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002	S	U	N/A	N/C
	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? *****Notes – The system is not over 250 psig.*****			X	

Comments:

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

Comments:

		SUBPART B - MATERIALS	S	U	N/A	N/C
		Are minimum requirements prescribed for the selection and qualification of pipe and components for use in pipelines 192.51				
42.	480-93-180 (1)	For **steel** pipe, manufactured in accordance with and meet the listed specification found under Appendix B 192.55*****Notes – This is in Section 6*****	X			
		For **new** plastic pipe, qualified for use under this part if: 192.59(a)				
43.	480-93-180 (1)	• It is manufactured in accordance with a listed specification; and 192.59(a)(1) • It is resistant to chemicals with which contact may be anticipated. 192.59(a) (2) *****Notes – Solvay does not have these types of facilities*****			X	
		For **used** plastic pipe, qualified for use under this part if: 192.59(b)				
44.	480-93-180 (1)	• It was manufactured in accordance with a listed specification; 192.59(b)(1) • It is resistant to chemicals with which contact may be anticipated; 192.59(b)(2) • It has been used only in natural gas service. 192.59(b)(3)(4) • Its dimensions are still within the tolerances of the specification to which it was manufactured; and, 192.59(b) • It is free of visible defects. 192.59(b)(5) *****Notes – Solvay does not have these types of facilities*****			X	
45.		Marking of Materials 192.63*****Notes – Solvay does not have these types of facilities for marking plastic pipe. The steel pipe meets listed specifications under 192.55 and that is in Section 6.*****	X			

Comments:

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SUBPART C – PIPE DESIGN						
		Procedures for assuring that the minimum requirements for design of pipe are met				
		For Steel Pipe	**S**	**U**	**N/A**	**N/C**
46.		Pipe designed of sufficient wall thickness, or installed with adequate protection, to withstand anticipated external pressures and loads that will be imposed on the pipe after installation. 192.103 *****Notes – The crossing on Industrial Way is cased. No new design or construction. *****	X			
47.		Design formula for steel pipe. 192.105(a) *****Notes – This is in Section 7.3*****	X			
48.		Yield strength (S) for steel pipe. 192.107 *****Notes – This is in Section 7.3*****	X			
49.		Nominal wall thickness (t) for steel pipe. 192.109 (a) & (b) (a) If the nominal wt is not known….. Determined by measuring the thickness of each piece of pipe at quarter points on one end unless….. (b) If the pipe is of uniform grade, size, and thickness and more than 10 lengths of pipeline, only 10 percent of the individual lengths, but not less than 10 lengths, need be measured. The thickness of the lengths that are not measured must be verified by applying a gauge set to the minimum thickness found by the measurement. The nominal wall thickness to be used in the design formula in §192.105 is the next wall thickness found in commercial specifications that is below the average of all the measurements taken. However, the nominal wall thickness used may not be more than 1.14 times the smallest measurement taken on pipe less than 20 inches (508 millimeters) in outside diameter, nor more than 1.11 times the smallest measurement taken on pipe 20 inches (508 millimeters) or more in outside diameter. *****Notes – This is in Section 7.3*****	X			
50.	480-93-180 (1)	Design factor (F) for steel pipe. 192.111				
51.	480-93-180 (1)	(a) Except as otherwise provided in paragraphs (b), (c), and (d) of this section, the design factor to be used in the design formula in §192.105 is determined in accordance with the following Class location Design factor (F) table. Class 1 **0.72**, Class 2 **0.60**, Class 3 **0.50**, Class 4 **0.40***Notes – This is in Section 7.3*****	X			
52.		(b) A design factor of 0.60 or less must be used in the design formula in §192.105 for steel pipe in Class 1 locations that: (1) Crosses the right-of-way of an unimproved public road, without a casing; (2) Crosses without a casing, or makes a parallel encroachment on, the right-of-way of either a hard surfaced road, a highway, a public street, or a railroad; (3) Is supported by a vehicular, pedestrian, railroad, or pipeline bridge; or (4) Is used in a fabricated assembly, (including separators, mainline valve assemblies, cross-connections, and river crossing headers) or is used within five pipe diameters in any direction from the last fitting of a fabricated assembly, other than a transition piece or an elbow used in place of a pipe bend which is not associated with a fabricated assembly. *****Notes – This is in Section 7.3*****	X			
53.		(c) For Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for uncased steel pipe that crosses the right-of-way of a hard surfaced road, a highway, a public street, or a railroad. *****Notes – This is in Section 7.3*****	X			

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SUBPART C – PIPE DESIGN						
54.		(d) For Class 1 and Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for- (1) Steel pipe in a compressor station, regulating station, or measuring station, and (2) Steel pipe, including a pipe riser, on a platform located offshore or in inland navigable waters. *****Notes – This is in Section 7.3*****	X			
55.		Longitudinal joint factor (E) for steel pipe. 192.113 *****Notes – This is in Section 7.3*****	X			
56.	480-93-180 (1)	Temperature derating factor (T) for steel pipe. 192.115 *****Notes – This is in Section 7.3*****	X			
		For Plastic Pipe				
57.	480-93-180 (1)	Subject to the limitations of §192.123, for determining the design pressure for plastic pipe in accordance with either formula listed. 192.121 *****Notes – The operator has no plastic pipe*****			X	
58.		For assuring that the design limitations for plastic pipe are not exceeded. 192.123 (a) thru (e) *****Notes – The operator has no plastic pipe*****			X	

Comments:

SUBPART D – DESIGN OF PIPELINE COMPONENTS			S	U	N/A	N/C
		For the design and installation of pipeline components and facilities, and relating to protection against accidental over-pressuring. 192.141				
59.	480-93-180 (1)	General requirements…. 192.143*****Notes – Solvay has no new construction or designs. All pipeline repairs are addressed in the welding portion of the manual. *****			X	
60.		Qualifying metallic components. 192.144 (a) & (b) *****Notes – Solvay has no new construction or components to install. All pipeline repairs are addressed in the welding portion of the manual. *****			X	
61.		For steel valves; meeting the minimum requirements of API 6D, or other standard that provides an equivalent performance level. 192.145 (a) thru (e) *****Notes – Solvay has no new construction or regulated valves*****			X	
62.		For each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B16.5, MSS SP-44, or the equivalent. 192.147 (a) thru (c) *****Notes – Solvay has no new construction or designs. All pipeline repairs are addressed in the welding portion of the manual. *****			X	
63.		For ensuring that each new transmission line and each replacement of line pipe, valve, fitting, or other line component in a transmission line is designed and constructed to accommodate the passage of instrumented internal inspection devices. 192.150 (a) thru (c) *****Notes – This has been added to the manual during the inspection. *****	X			
64.		Components fabricated by welding. 192.153 (a) thru (d) *****Notes – Attachment H states fittings should always be used. ****			X	

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		SUBPART D – DESIGN OF PIPELINE COMPONENTS	S	U	N/A	N/C
65.		Welded branch connections. 192.155 *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*** ***Notes – Solvay has no new construction or designs. All pipeline repairs are addressed in the welding portion of the manual.*****			X	
66.		Flexibility. 192.159 *****Notes – Solvay has no new construction or designs. All pipeline repairs are addressed in the welding portion of the manual.*****			X	
67.		Supports and Anchors 192.161(a) (a) thru (f) *****Notes – Solvay has no new construction or designs. All pipeline repairs are addressed in the welding portion of the manual.*****			X	
		Compressor Stations				
68.	480-93-180 (1)	Compressor stations: Design and construction. 192.163 (a) thru (e) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
69.		Compressor stations: Liquid removal. 192.165 (a) & (b) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
70.		Compressor stations: Emergency shutdown. 192.167 (a) thru (c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
71.	480-93-180 (1)	Compressor stations: Pressure limiting devices. 192.169 (a) & (b) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
72.		Compressor stations: Additional safety equipment. 192.171 (a) thru (e) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
73.		Compressor stations: Ventilation. 192.173 *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
74.		Pipe-type and bottle-type holders. 192.175 *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
75.		Additional provisions for bottle-type holders. 192.177 *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
76.	480-93-180 (1)	Transmission line valves.192.179 (a) thru (d) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review. – No regulated valves*****			X	
77.		Distribution line valves. 192.181(a) thru (c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
78.	480-93-180 (1)	Vaults: Structural design requirements 192.183 (a) thru (c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
79.		Vaults: Accessibility 192.185 (a) thru (c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
80.		Vaults: Sealing, venting, and ventilation. 192.187 (a) thru (c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
81.		Vaults: Drainage and waterproofing 192.189 (a) thru (c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
82.		Design pressure of plastic fittings 192.191 (a) & (b) *****Notes – The operator has no plastic pipe*****			X	
83.		Valve installation in plastic pipe. 192.193 *****Notes – The operator has no plastic pipe*****			X	
84.		Protection against accidental over-pressuring 192.195 (a) & (b) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review. This was addressed in the standard inspection this year. Pressure is limited by design. No OPP required*****			X	
85.		Control of the pressure of gas delivered from high-pressure distribution systems. 192.197 (a) thru (c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
86.		Except for rupture discs, each pressure relief or pressure limiting device must: 192.199 (a) thru (h) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	

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		SUBPART D – DESIGN OF PIPELINE COMPONENTS	S	U	N/A	N/C
87.		Required capacity of pressure relieving and limiting stations. 192.201(c) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
88.		Instrument, Control, and Sampling Pipe and Components 192.203(a) & (b) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	

Comments:

		SUBPART E – WELDING OF STEEL IN PIPELINES WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION	S	U	N/A	N/C
89.	480-93-180(1)	Welding procedures must be qualified under **Section 5 of API 1104** or **Section IX of ASME Boiler and Pressure Code** (2001 ed.) by destructive test. Amdt. 192-103 pub 06/09/06, eff. 07/10/06. .225(a) *****Notes – This is in Attachment H*****	X			
90.		Retention of welding procedure – details and test .225(b) *****Notes – This is in Attachment H*****	X			
91.		Welders must be qualified by **Section 6 of API 1104 (20th edition 2007, including errata 2008)** or **Section IX of the ASME Boiler and Pressure Vessel Code** (**2007 edition, July 1, 2007**), except that a welder qualified under an earlier edition than currently listed in **192.7** may weld, but may not requalify under that earlier edition. (Amdt 192-114 Pub. 8/11/10 eff. 10/01/10). *****Notes – This is in Attachment H*****	X			
92.		Welders may be qualified under **section I of Appendix C** to weld on lines that operate at **< 20% SMYS.** .227(b) *****Notes – This is in Attachment H*****	X			
		Oxyacetylene welders may qualify under 49 CFR § 192 Appendix C, but may only weld the following size pipe: 480-93-080(1)(a)	**S**	**U**	**N/A**	**N/C**
93.	480-93-180 (1)	• Nominal **two-inch** or smaller branch connections to nominal **six-inch** or smaller main or service pipe. 480-93-080(1)(a)(i) *****Notes – No BOA used.*****			X	
94.		• Nominal **two-inch** or smaller below ground butt welds 480-93-080(1)(a)(ii) *****Notes – No BOA used.*****			X	
95.	480-93-180(1)	• Nominal **four-inch** or smaller above ground manifold and meter piping operating at 10 psig or less. 480-93-080(1)(a)(iii) *****Notes – No BOA used.*****			X	
96.		• Appendix C Welders re-qualified **2/Yr (7.5Months)** 480-93-080(1)(a)(iv) *****Notes – This is in Attachment H*****	X			
97.		Use of testing equipment to record and document essential variables 480-93-080(1)(b) (eff 6/02/05)******Notes – Nothing has changed since the 2018 DNorwood inspection. NWMFP has this in their procedures******	X			
98.		Qualified written welding procedures must be located on-site where welding is being performed 480-93-080(1)(d) *****Notes – This is in Section 7.4 Pg.17*****	X			
99.		Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. 480-93-080(3) (eff 6/02/05) *****Notes – This is in Attachment I Section 10.7 *****	X			
100.	480-93-180(1)	To weld on compressor station piping and components, a welder must successfully complete a destructive test .229(a) *****Notes – Solvay has no compressors or compressor stations*****			X	
101.		Welder must have used welding process within the preceding **6 months** .229(b) *****Notes – This is in Attachment H Page 3 *****	X			
102.		A welder qualified under .227(a)… .229(c)				
103.		• May not weld on pipe that operates at ≥ 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the **sections 6 or 9 of API Standard 1104**; may maintain an ongoing qualification status by performing welds tested and found acceptable at least **twice per year**, not	X			

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		exceeding **7½ months**; may not requalify under an earlier referenced edition. .229(c)(1) *****Notes – This is in Attachment H and I *****				
104.		• May not weld on pipe that operates at < 20% SMYS unless is tested in accordance with .229(c)(1) or re-qualifies under .229(d)(1) or (d)(2). .229(c)(2) *****Notes – This is in Attachment H and I *****	X			
		Welders qualified under .227(b) may not weld unless: .229(d)	**S**	**U**	**N/A**	**N/C**
105.	480-93-180(1)	• Re-qualified within **1 year/15 months**, or .229(d)(1) *****Notes – This is in Attachment H and I *****	X			
106.		• Within **7½ months** but at least **twice per year** had a production weld pass a qualifying test .229(d)(2) *****Notes – This is in Attachment H and I *****	X			
107.		Welding operation must be protected from weather .231 *****Notes – This is in Attachment H Pg.4 *****	X			
108.		Miter joints (**consider pipe alignment**) .233 *****Notes – This is in Attachment H Pg.4 – not used by NWMFP*****			X	
109.		Welding preparation and joint alignment .235 *****Notes – This is in Attachment H Pg.4 *****	X			
110.		Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure: .241(a) thru (c) *****Notes – This is in Attachment H Pg.5 *****	X			
111.		Nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld .243 (a) thru (f) *****Notes – This is in Attachment H Pgs.5-7*****	X			
112.		Repair or removal of defects.245 (a) thru (c) *****Notes – This is in Attachment H Pg.7 *****	X			
		• Sleeve Repair – low hydrogen rod (**Best Practices –ref. API 1104 App. B, In Service Welding**)				

Comments:

SUBPART F - JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION			**S**	**U**	**N/A**	**N/C**
113.		Joining of plastic pipe .281				
114.		A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint. 281(a) *****Notes – The operator has no plastic pipe*****			X	
115.		Each solvent cement joint on plastic pipe must comply with the following: .281(b) *****Notes – The operator has no plastic pipe*****			X	
116.		• The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint. .281(b)(1) *****Notes – The operator has no plastic pipe*****			X	
117.		• The solvent cement must conform to ASTM Designation: D 2513. .281(b)(2) *****Notes – The operator has no plastic pipe*****			X	
118.		• The joint may not be heated to accelerate the setting of the cement. .281(b)(3) *****Notes – The operator has no plastic pipe*****			X	
119.		Each heat-fusion joint on plastic pipe must comply with the following: .281(c)				
120.	480-93-180(1)	• A butt heat-fusion joint must be joined by a device that holds the heater element square to the ends of the piping, compresses the heated ends together, and holds the pipe in proper alignment while the plastic hardens. .281(c)(1) *****Notes – The operator has no plastic pipe*****			X	
121.		• A socket heat-fusion joint must be joined by a device that heats the mating surfaces of the joint uniformly and simultaneously to essentially the same temperature. .281(c)(2) *****Notes – The operator has no plastic pipe*****			X	

122.		• An electrofusion joint must be joined utilizing the equipment and techniques of the fittings manufacturer or equipment and techniques shown, by testing joints to the requirements of §192.283(a)(1)(iii), to be at least equivalent to those of the fittings manufacturer. .281(c)(3) *****Notes – The operator has no plastic pipe*****			X	
123.		• Heat may not be applied with a torch or other open flame. .281(c)(4) *****Notes – The operator has no plastic pipe*****			X	
124.		Each adhesive joint on plastic pipe must comply with the following: .281(d) *****Notes – The operator has no plastic pipe*****				
125.		• The adhesive must conform to ASTM Designation: D 2517. .281(d)(1) *****Notes – The operator has no plastic pipe*****			X	
126.		• The materials and adhesive must be compatible with each other. .281(d)(1) *****Notes – The operator has no plastic pipe*****			X	
127.		Each compression type mechanical joint on plastic pipe must comply with the following: .281(e)				
128.		• The gasket material in the coupling must be compatible with the plastic. .281(e)(1) *****Notes – The operator has no plastic pipe*****			X	
129.		• A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling. .281(e)(2) *****Notes – The operator has no plastic pipe*****			X	
130.		Before any written procedure established under §192.273(b) is used for making plastic pipe joints by a heat fusion, solvent cement, or adhesive method, the procedure must be qualified by subjecting specimen joints made according to the procedure to the following tests: .283(a) *****Notes – The operator has no plastic pipe*****				
131.		The burst test requirements of– .283(a)(1)				
132.		• Thermoplastic pipe: paragraph 6.6 (sustained pressure test) or paragraph 6.7 (Minimum Hydrostatic Burst Test) or paragraph 8.9 (Sustained Static pressure Test) of ASTM D2513 .283(a)(1)(i) *****Notes – The operator has no plastic pipe*****			X	
133.	480-93-180(1)	• Thermosetting plastic pipe: paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517; or .283(a)(1)(ii) *****Notes – The operator has no plastic pipe*****			X	
134.		• Electrofusion fittings for polyethylene pipe and tubing: paragraph 9.1 (Minimum Hydraulic Burst Pressure Test), paragraph 9.2 (Sustained Pressure Test), paragraph 9.3 (Tensile Strength Test), or paragraph 9.4 (Joint Integrity Tests) of ASTM Designation F1055. .283(a)(1)(iii) *****Notes – The operator has no plastic pipe*****			X	
135.		For procedures intended for lateral pipe connections, subject a specimen joint made from pipe sections joined at right angles according to the procedure to a force on the lateral pipe until failure occurs in the specimen. If failure initiates outside the joint area, the procedure qualifies for use; and, .283(a)(2) *****Notes – The operator has no plastic pipe*****			X	
136.		For procedures intended for non-lateral pipe connections, follow the tensile test requirements of ASTM D638, except that the test may be conducted at ambient temperature and humidity If the specimen elongates no less than 25 percent or failure initiates outside the joint area, the procedure qualifies for use. .283(a)(3) *****Notes – The operator has no plastic pipe*****			X	
137.		Before any written procedure established under §192.273(b) is used for making mechanical plastic pipe joints that are designed to withstand tensile forces, the procedure must be qualified by subjecting five specimen joints made according to the procedure to the following tensile test: .283(b)				
138.		• Use an apparatus for the test as specified in ASTM D 638 (except for conditioning). .283(b)(1) *****Notes – The operator has no plastic pipe*****			X	
139.	480-93-180(1)	• The specimen must be of such length that the distance between the grips of the apparatus and the end of the stiffener does not affect the joint strength. .283(b)(2) *****Notes – The operator has no plastic pipe*****			X	
140.		• The speed of testing is 0.20 in. (5.0 mm) per minute, plus or minus 25 percent. .283(b)(3) *****Notes – The operator has no plastic pipe*****			X	
141.		• Pipe specimens less than 4 inches (102 mm) in diameter are qualified if the pipe yields to an elongation of no less than 25 percent or failure initiates outside the joint area. .283(b)(4) *****Notes – The operator has no plastic pipe*****			X	

142.		• Pipe specimens 4 inches (102 mm) and larger in diameter shall be pulled until the pipe is subjected to a tensile stress equal to or greater than the maximum thermal stress that would be produced by a temperature change of 100° F (38° C) or until the pipe is pulled from the fitting. If the pipe pulls from the fitting, the lowest value of the five test results or the manufacturer's rating, whichever is lower must be used in the design calculations for stress. .283(b)(5) *****Notes – The operator has no plastic pipe*****			X	
143.		• Each specimen that fails at the grips must be retested using new pipe. .283(b)(6) *****Notes – The operator has no plastic pipe*****			X	
144.		• Results pertain only to the specific outside diameter, and material of the pipe tested, except that testing of a heavier wall pipe may be used to qualify pipe of the same material but with a lesser wall thickness. .283(b)(7) *****Notes – The operator has no plastic pipe*****			X	
145.		A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints. .283(c) *****Notes – The operator has no plastic pipe*****			X	
146.		Pipe or fittings manufactured before July 1, 1980, may be used in accordance with procedures that the manufacturer certifies will produce a joint as strong as the pipe. .283(d) *****Notes – The operator has no plastic pipe*****			X	
147.		No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by: .285(a)				
148.		• Appropriate training or experience in the use of the procedure; and .285(a)(1) *****Notes – The operator has no plastic pipe*****			X	
149.	480-93-180(1)	• Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section. .285(a)(2) *****Notes – The operator has no plastic pipe*****			X	
150.		The specimen joint must be: .285(b)				
151.		• Visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure; and .285(b)(1) *****Notes – The operator has no plastic pipe*****			X	
152.		• In the case of a heat fusion, solvent cement, or adhesive joint; .285(b)(2) *****Notes – The operator has no plastic pipe*****			X	
153.	480-93-180(1)	Tested under any one of the test methods listed under §192.283(a) applicable to the type of joint and material being tested; .285(b)(2)(i) *****Notes – The operator has no plastic pipe*****			X	
154.		Examined by ultrasonic inspection and found not to contain flaws that may cause failure; or .285(b)(2)(ii) *****Notes – The operator has no plastic pipe*****			X	
155.		Cut into at least three longitudinal straps, each of which is: .285(b)(2)(iii) *****Notes – The operator has no plastic pipe*****			X	
156.		Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and .285(b)(2)(iii)(A) *****Notes – The operator has no plastic pipe*****			X	
157.		Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area. .285(b)(2)(iii)(B) *****Notes – The operator has no plastic pipe*****			X	
158.		A person must be requalified under an applicable procedure, if during any 12-month period that person: .285(c)				
159.		• Does not make any joints under that procedure; or .285(c)(1) *****Notes – The operator has no plastic pipe*****			X	
160.	480-93-180(1)	• Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513. .285(c)(2) *****Notes – The operator has no plastic pipe*****			X	
161.		Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section. .285(d) *****Notes – The operator has no plastic pipe*****			X	
		Plastic pipe joiners re-qualified **1/Yr (15 Months)** 480-93-080 (2)				

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162.	480-93-180(1)	• Qualified written plastic joining procedures must be located on-site where plastic joining is being performed. 480-93-080(2)(a) *****Notes – The operator has no plastic pipe*****			X	
163.		• Plastic pipe joiners re-qualified if no production joints made during any 12 month period 480-93-080(2)(b) (eff 6/02/05) *****Notes – The operator has no plastic pipe*****			X	
164.		• Tracking production joints or re-qualify joiners **1/Yr (12Months)** 480-93-080(2)(c) (eff 6/02/05) *****Notes – The operator has no plastic pipe*****			X	
165.	480-93-180(1) / 192.273(b)	No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure. .287 *****Notes – The operator has no plastic pipe*****			X	
166.	NTSB recomendation	Is the operator using best practices as recomended by the manufacturer for using specified tools and methods such as the appropriate wrench for PermaLock mechanical tapping Tee assemblies. *****Notes – The operator has no plastic pipe*****			X	

Comments:

SUBPART G – CONSTRUCTION REQUIREMENTS for TRANSMISSION LINES and MAINS			**S**	**U**	**N/A**	**N/C**
167.	480-93-180(1)	Compliance with specifications or standards. 192.303*****Notes – This is in Section 2*****	X			
168.		Inspection of each transmission line and main during construction 192.305 *****Notes - This is now in Section 7.4.**	X			
169.		Inspection of materials 192.307 *****Notes – This is on Pg. 17**	X			
170.		Repair of steel pipe 192.309 (a) thru (e) *****Notes – This is in Attachment H*****	X			
171.		Repair of plastic pipe. 192.311 *****Notes – The operator has no plastic pipe*****			X	
172.		Bends and elbows. 192.313 (a) thru (c) *****Notes – This is in Attachment I – they use fittings – not bends *****			X	
173.		Wrinkle bends in steel pipe. 192.315 (a) & (b) *****Notes – This is in Attachment I – they use fittings – not bends *****			X	
174.		Protection from hazards 192.317 (a) thru (c) *****Notes – This is in Appendix A Task 31*****	X			
175.		Installation of Pipe in a ditch 192.319 (a) thru (c) *****Notes - (Solvay is < 20% SMYS)*****			X	
176.		Installation of plastic pipe. 192.321 (a) thru (h) *****Notes – The operator has no plastic pipe*****			X	
480-93-178 WAC PROTECTION OF PLASTIC PIPE			**S**	**U**	**N/A**	**N/C**
177.	480-93-180(1)	Procedures for the storage, handling, and installation of plastic pipelines in accordance with the latest applicable manufacturer's recommended practices. 480-93-178(1) *****Notes – The operator has no plastic pipe*****			X	
178.		Stated acceptable time limit for maximum cumulative ultraviolet light exposure 480-93-178 (2) *****Notes – The operator has no plastic pipe*****			X	
179.		Separation requirements when installing plastic pipelines parallel to other underground utilities 480-93-178 (4) *****Notes – The operator has no plastic pipe*****			X	
180.		Separation requirements when installing plastic pipelines perpendicular to other underground utilities 480-93-178 (5) *****Notes – The operator has no plastic pipe*****			X	
181.		Casings 192.323 (a) thru (d) *****Notes – Page 17 *****	X			
182.		Casing of pipelines. 480-93-115 (1) thru (4) *****Notes – Page 17 *****	X			
183.		Underground clearance. 192.325 (a) thru (d). *****Notes – This is in Appendix A Task 24*****	X			
184.		Cover. 192.327 (a) thru (g) *****Notes – This is in Appendix A Task 27*****	X			

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Comments:

SUBPART H - CUSTOMER METERS, SERVICE REGULATORS, and SERVICE LINES						
			S	**U**	**N/A**	**N/C**
185.	480-93-180 (1)	Meters and service regulators installed at locations as prescribed under 192.353 (a) thru (d) *****Notes – The operator has none of these facilities*****			X	
186.		Service regulator vents and relief vents installed and protected from damage. Vaults housing meters and regulators protected from loading due to vehicular traffic. 192.355 (a) thru (c) *****Notes – The operator has none of these facilities*****			X	
187.	480-93-180 (1)	Meters and regulators installed to minimize stresses and insure that potential releases vent to outside atmosphere. 192.357 (a) thru (d) *****Notes – The operator has none of these facilities*****			X	
		480-93-140 WAC SERVICE REGULATORS	**S**	**U**	**N/A**	**N/C**
188.	480-93-180 (1)	Procedures for installing, operating, and maintaining service regulators in accordance with federal and state regulations, and manufacturer's recommended installation and maintenance practices. 480-93-140(1) *****Notes – The operator has none of these facilities*****			X	
189.		Procedures for inspecting and testing service regulators and associated safety devices during the initial turn-on, and when a customer experiences a pressure problem. Testing must include….. 480-93-140(2) *****Notes – The operator has none of these facilities*****			X	
190.	480-93-180 (1)	Minimum service line installation requirements as prescribed under 192.361 (a) thru (g) *****Notes – The operator has none of these facilities*****			X	
191.		Location of service-line valves as prescribed under 192.365 (a) thru (c) *****Notes – The operator has none of these facilities*****			X	
192.		General requirements for locations of service-line connections to mains and use of compression fittings 192.367 (a) thru (b)(2) *****Notes – The operator has none of these facilities*****			X	
193.		Connections of service lines to cast iron or ductile iron mains. 192.369 (a) thru (b) *****Notes – The operator has none of these facilities*****			X	
194.		Provisions for new service lines not in use 192.379 (a) thru (c) *****Notes – The operator has none of these facilities*****			X	
195.		EFV performance requirements §192.381 (a) thru (e) *****Notes – The operator has none of these facilities*****			X	
196.		Excess flow valves, does the program must meet the requirements outlined in §192.38? *****Notes – The operator has none of these facilities*****			X	
197.		Customer notification in accordance with §192.383. *****Notes – The operator has none of these facilities*****			X	

Comments:

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SUBPART I - CORROSION CONTROL			**S**	**U**	**N/A**	**N/C**
198.	480-93-180(1)	Corrosion procedures established for the Design, Operations, Installation & Maintenance of CP systems, carried out by, or under the direction of, a person qualified in pipeline corrosion control methods .453 *****Notes – This is in Section 7.5*****	X			
199.		Written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. 480-93-110(4) *****Notes – This is in Section 7.5*****	X			
200.		Recording the condition of all underground metallic facilities each time the facilities are exposed. 480-93-110(6) *****Notes – This is in Section 7.5*****	X			
201.		CP test reading on all exposed facilities where coating has been removed 480-93-110(8) (eff 6/02/05) *****Notes – This is in Section 7.5*****	X			
202.	480-93-180(1)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) 480-93-110(2) *****Notes – This is in Section 7.5*****	X			
203.		Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas (**1 per 3 years/39 months**) .465(e) *****Notes – The operator has none of these facilities*****			X	
204.		Written program to monitor for indications of internal corrosion. The program must also have remedial action requirements for areas where internal corrosion is detected. 480-93-110(7) (eff 6/02/05) *****Notes – This is in Section 7.5 Pg 19*****	X			
205.		Written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action. 480-93-110(9) (eff 6/02/05) *****Notes – This is in Section 7.5 Pg 19 and 20*****	X			
206.		Remedial measures (cast iron and ductile iron pipelines) .489*****Notes – This is in Section 7.5 Pg 19 and 20*****			X	
207.		Records retained for <u>each</u> cathodic protection test, survey, or inspection required by 49 CFR Subpart I, and chapter 480-93 WAC. 480-93-110 *****Notes – This is in Section 7.5 Pg 20*****	X			
WAC 480-93-110 Corrosion Requirements			**S**	**U**	**N/A**	**N/C**
208.		Casings inspected/tested annually not to exceed **fifteen months** 480-93-110(5) *****Notes – This is in Section 7.5 Pg 17 and 18*****	X			
209.	480-93-180(1)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods 480-93-110(5)(a) *****Notes – Test lead are on the casings*****			X	
210.		Possible shorted conditions – Perform confirmatory follow-up inspection within **90** days 480-93-110(5)(b) *****Notes – This is in Section 7.5 Pg 17 and 18*****	X			
211.		Casing shorts cleared when practical 480-93-110(5)(c) *****Notes – This is in Section 7.5 Pg 17 and 18*****	X			
212.	480-93-180(1)	Shorted conditions leak surveyed within 90 days of discovery. **Twice annually/7.5 months** 480-93-110(5)(d) *****Notes – The line is leak surveyed monthly.*****	X			
213.		CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched) 480-93-110(3) *****Notes – This is in Section 7.5 Pg 17*****	X			

Comments:

SUBPART J – TEST REQUIREMENTS	**S**	**U**	**N/A**	**N/C**

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214.	480-93-180(1)	Procedures to ensure that the provisions found under 192.503(a) thru (d) for new segments of pipeline, or Return to Service segments of pipeline which have been relocated or replaced are met. *****Notes – This is in Section 7.6 Pg 21*****	X			
215.		Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS. 192.505 (a) thru (e) *****Notes – This is mentioned in the CT list, but doesn't apply to Solvay due to design limitations. *****			X	
216.		Test requirements for pipelines to operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig. 192.507 (a) thru (c) *****Notes – This is in Section 7.6 Pg 21*****	X			
217.		Test requirements for pipelines to operate below 100 psig. 192.509 (a) & (b) *****Notes – The operator has none of these facilities*****			X	
218.		Test requirements for service lines. 192.511 (a) thru (c) *****Notes – The operator has none of these facilities*****			X	
219.		Test requirements for plastic pipelines. 192.513 (a) thru (d) *****Notes – The operator has none of these facilities*****			X	
220.		Environmental protection and safety requirements. 192.515 (a) & (b) *****Notes – Environmental and safety concerns are addressed in each safety section of the individual task procedures. *****	X			
221.		Records 192.517 Refer also to 480-93-170 (7) (a-h) below. *****Notes – This is in Section 7.6 Pg 21*****	X			

Comments:

WAC 480-93-170 PRESSURE TEST PROCEDURES			**S**	**U**	**N/A**	**N/C**
222.	480-93-180(1)	Notification in writing, to the commission, at least two business days prior to any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the SMYS 480-93-170(1) *****Notes – The operator has none of these facilities*****			X	
223.		• In Class 3 or Class 4 locations, as defined in 49 CFR § 192.5, or within one hundred yards of a building, must be at least eight hours in duration. 480-93-170(1)(a) *****Notes – The operator has none of these facilities*****			X	
224.		• When the test medium is to be a gas or compressible fluid, each operator must notify the appropriate public officials so that adequate public protection can be provided for during the test. 480-93-170(1)(b) **– The operator has none of these facilities*****			X	
225.		• In an emergency situation where it is necessary to maintain continuity of service, the requirements of subsection (1) of this section and subsection (1)(a) may be waived by notifying the commission by telephone prior to performing the test. 480-93-170(1)(c) **– The operator has none of these facilities*****			X	
226.		Minimum test pressure for any steel service line or main, must be determined by multiplying the intended MAOP by a factor determined in accordance with the table located in 49 CFR § 192.619 (a)(2)(ii). 480-93-170(2) *****Notes – This is in Section 7.6 Pg. 21*****	X			
227.		Re-testing of service lines broken, pulled, or damaged, resulting in the interruption of gas supply to the customer, must be pressure tested from the point of damage to the service termination valve prior to being placed back into service. 480-93-170(4) *****Notes – The operator has none of these facilities*****			X	
228.		Maintain records of all pressure tests performed for the life of the pipeline and document information as listed under 480-93-170(7) (a-h). *****Notes – This is in Section 7.6*****	X			
229.	480-93-180(1)	Maintain records of each test where multiple pressure tests are performed on a single installation. 480-93-170(9) *****Notes – The operator has none of these facilities*****			X	

230.		Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations.480-93-170(10) *****Notes – This is in Section 7.6 Pg. 21*****	X			
231.		• When there are no manufacturer's recommendations, then tested at an appropriate schedule determined by the operator. *****Notes – This is in Section 7.6 Pg. 21*****	X			
232.		• Test equipment must be tagged with the calibration or accuracy check expiration date. *****Notes – This is in Section 7.6 Pg. 21*****	X			

Comments:

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

Comments:

233-238 No uprates are planned or will be performed on the system due to design limitations.

SUBPART L - OPERATIONS			**S**	**U**	**N/A**	**N/C**
239.	480-93-180(1) / 192.605(a)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) 192.605(a) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09*****Notes – This is in Section 7.7 Pg. 21*****	X			
240.		Availability of construction records, maps, operating history to operating personnel 192.605(b)(3) *****Notes – This is in Section 7.7 Pg. 21 and 22*****	X			

Comments:

Utilities and Transportation Commission
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S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked

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

SUBPART – L DAMAGE PREVENTION PROGRAM PROCEDURES			**S**	**U**	**N/A**	**N/C**
241.		**Damage Prevention (Operator Internal Performance Measures)**	**S**	**U**	**N/A**	**N/C**
242.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices, Best Practice 4-18. Recommended only, not required) *****Notes – Actual locates are very few Solvay reviews performance.*****	X			
243.		Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? *****Notes – NWMFP does not contract out their locating. Solvay reviews their performance annually*****			X	
244.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? *****Notes - Re-training is and has been a part of OQ*****	X			
245.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? *****Notes – This is done annually*****	X			
246.		Review operator locating and excavation procedures for compliance with state law and regulations. *****Notes – The UtiliGuard Locator User's Manual is still used.*****	X			
247.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. *****Notes - This was reviewed during the standard inspection in 2020. No issues*****	X			
248.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? *****Notes - See OQ records for more detail. OQ records were reviewed*****	X			
249.		**Informational purposes only. Not Required.** Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do **Y N** X - *****Notes - No damages to report.*****	X			
250.		**PHMSA Areas of Emphasis:** • Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? *****Notes – This is in the NWMFP OQ Manual on Pg. 52*****	X			
251.		• Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? *****Notes – This is in manual HSE 3306-I*****	X			

Comments:

SUBPART – L FAILURE INVESTIGATION PROCEDURES	**S**	**U**	**N/A**	**N/C**

252.	480-93-180(1) / 192.617	Analyzing accidents and failures including third party damage and leak response to ensure appropriate operator response including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 *****Notes – This is in manual HSE 3306-I*****	X			

Comments:

WAC 480-93-015 ODORIZATION PROCEDURES			**S**	**U**	**N/A**	**N/C**
253.		Use of odorant testing instrumentation/Monthly testing interval 480-93-015 (2) *****Notes – The line is unodorized*****			X	
254.		Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) 480-93-015 (3) *****Notes – The line is unodorized*****			X	
255.	480-93-180(1)	Records maintained for usage, odorant tests performed and equipment calibration (**5yrs**) 480-93-015(4) *****Notes – The line is unodorized*****			X	

Comments:

SUBPART – L PIPELINE PURGING PROCEDURES			**S**	**U**	**N/A**	**N/C**
256.	480-93-180(1)	(a) Lines containing **air** must be properly purged. *****Notes This is in Section 7.7*****	X			
257.	480-93-180(1)	(b) Lines containing **gas** must be properly purged*****Notes This is in Section 7.7*****	X			

Comments:

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

WAC 480-93-185 GAS LEAK INVESTIGATION			**S**	**U**	**N/A**	**N/C**
		Procedures for the prompt investigation of any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities.				
258.	480-93-180(1)	• received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public 480-93-185(1) *****Notes – This is in HSE 3007-I*****	X			
259.	480-93-180(1)	• Grade leak in accordance with WAC 480-93-186, and take appropriate action 480-93-185(1) **Notes – All leaks repaired immediately. Not graded. Procedure: Attachment B section P6********	X			
260.	480-93-180(1)	• retain the leak investigation record for the life of the pipeline. 480-93-185(1) *****Notes – This is in Section 7.8*****	X			

261.	480-93-180(1)	Prevent removal of any suspected gas facility until the commission or the lead investigative authority has designated the release of the gas facility and keep the facility intact until directed by the lead investigative authority 480-93-185(2) *****Notes – This is in Section 7.8*****	X			
262.	480-93-180(1)	Taking appropriate action when leak indications originating from a foreign source. Notification requirements. 480-93-185(3) *****Notes – This is in Section 7.8*****	X			

WAC 480-93-186 LEAK EVALUATION			**S**	**U**	**N/A**	**N/C**
263.	480-93-180(1)	Grade leaks as defined in WAC 480-93-186 to establish the leak repair priority. 480-93-186(1) *****Notes – 7.8 Maintenance Pg. 26. Additionally, Attachment B section P6 "For this hydrogen pipeline, all leaks are considered to be Class 1 leaks – Class 1 leak is a leak that represents an existing or probable hazard to persons or property, and requires prompt action, immediate repair, or continuous action until the conditions are no longer a hazard. Hydrogen has an explosive range of 4.1% - 76% in air.*****	X			
264.	480-93-180(1)	Procedure for evaluating the concentration and extent of gas leakage 480-93-186(2) **Note:** Including third-party damage where there is a possibility of multiple leaks and underground migration into nearby buildings. *****Notes – All leaks repaired immediately. Not graded. Procedure: Attachment B section P6*****	X			
265.	480-93-180(1)	Use of a combustible gas indicator to check the perimeter of a leak area. Follow-up inspection on repaired leaks no later than thirty days following repair. 480-93-186(3) *****Notes – All leaks repaired immediately with a section of pipe – no leak clamps will be used. This would require a leak test. Not graded. Procedure: Attachment B section P6*****	X			
266.	480-93-180(1)	Grade 1 and 2 leaks downgraded once to Grade 3 leak without a physical repair. After downgrade, repair must be made not to exceed twenty-one months 480-93-186(4) *****Notes – All leaks repaired immediately. Not graded. Procedure: Attachment B sections P6*****			X	

Comments:

WAC 480-93-187 GAS LEAK RECORDS			**S**	**U**	**N/A**	**N/C**
		Gas leak records must contain, at a minimum, the criteria outlined in 480-93-187 (1-13)				
267.	480-93-180(1)	1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the employee(s) conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron); (8) Pipe condition; (9) Type of repair; (10) Leak cause; (11) Date pipe installed (if known); (12) Magnitude and location of CGI readings left; and (13) Unique identification numbers (such as serial numbers) of leak detection equipment.*****Notes – This is in Section 7.8*****	X			

Comments:

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S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked

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

		WAC 480-93-188 GAS LEAK SURVEYS	S	U	N/A	N/C
268.	480-93-180(1)	gas leak surveys using a gas detection instrument covering areas listed in 480-93-188(1)(a-e) (a) Over all mains, services, and transmission lines including the testing of the atmosphere near other utility (gas, electric, telephone, sewer, or water) boxes or manholes, and other underground structures; (b) Through cracks in paving and sidewalks; (c) On all above ground piping (may be checked with either a gas detection instrument or with a soap solution); (d) Where a gas service line exists, the gas pipeline company must conduct a leak survey at the building wall at the point of entrance, using a bar hole if necessary; and (e) Within all buildings where gas leakage has been detected at the outside wall, at locations where escaping gas could potentially migrate into and accumulate inside the building. *****Notes – This is in Procedure P-6*****	X			
269.		Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) 480-93-188(2) .*****Notes – This is in Section 7.8*****	X			
270.		Surveys conducted according to the minimum frequencies outlined under 480-93-188(3)(a-d) *****Notes – They perform leak surveys once a month due to the gas being unodorized***** **Attachment A OM&E Manual – Task Summary** **Task Schedule Responsibility** **Leak Survey Section 192.723 1 months Outside Services** **Procedure: Attachment B sections P6**	X			
271.		Surveys conducted under the following circumstances outlined under 480-93-188(4)(a-e) **(4) Each gas pipeline company must conduct special leak surveys under the following circumstances:** **(a) Prior to paving or resurfacing, following street alterations or repairs where gas pipelines are under the area to be paved, and where damage could have occurred to gas pipelines;** **(b) In areas where substructure construction occurs adjacent to underground gas pipelines, and damage could have occurred to the gas pipeline, each gas pipeline company must perform a gas leak survey following the completion of construction, but prior to paving;** **(c) Unstable soil areas where active gas pipelines could be affected;** **(d) In areas and at times of unusual activity, such as earthquake, floods, and explosions; and** **(e) After third-party excavation damage to services, each gas pipeline company must perform a gas leak** *****Notes – The pipeline is already surveyed monthly – there is no prescriptive weekly or bi-weekly requirement to leak survey*****	X			
272.		Survey records must be kept for a minimum of five years and contain information required under 480-93-188(5)(a-f) *****Notes – This is on Pg. 27*****	X			

Utilities and Transportation Commission
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S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked

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

273.		Self audits as necessary, but not to exceed three years between audits and meet the criteria outlined under 480-93-188(6)(a-e) *****Notes – This is performed using the "Hydrogen Pipeline Field Audit Form."**	X			

Comments:

SUBPART - M VALVE AND VAULT MAINTENANCE PROCEDURES			**S**	**U**	**N/A**	**N/C**
		Service Valves	**S**	**U**	**N/A**	**N/C**
274.	480-93-180(1) / 192.605 (b)	Written service valve installation and maintenance program detailing the valve selection process, inspection, maintenance, and operating procedures. Does the program consider the criteria listed under 480-93-100(2)(a-f)? *****Notes – The operator has none of these facilities*****			X	
275.		Service valve maintenance **(1 per yr/15 months)** 480-93-100(3) *****Notes – The operator has none of these facilities*****			X	
276.		Service valve installation and maintenance program fully implemented by 6/01/07**?** 480-93-100(6) *****Notes - No such relevant facilities/equipment existed in the scope of inspection review.*****			X	
		Vaults				

Comments:

SUBPART N — QUALIFICATION of PIPELINE PERSONNEL			**S**	**U**	**N/A**	**N/C**
Date of last UTC staff OQ plan review 6/16/2020						
277.	480-93-180(1)	Have "New Construction" activities been identified and included in the operator's covered task list? 480-93-013 *****Notes – Per Solvay's manual, new construction shall be addressed in the Operator's Operation & Maintenance Manual as well as regularly scheduled maintenance. The operator's manual mentions new construction vs in-service tasks*****	X			

Comments:

FILING REQUIREMENTS for DESIGN, SPECIFICATION, and CONSTRUCTION	**S**	**U**	**N/A**	**N/C**

278.	480-93-180(1)	Submittal of construction procedures, designs, and specifications used for each pipeline facility prior to operating the pipeline. All procedures must detail the acceptable types of materials, fittings, and components for the different types of facilities in the operator's system. 480-93-017(1) *****Notes – The pipeline is already in operation.*****			X	
279.	480-93-180(1)	Construction plans not conforming with a gas company's existing and accepted construction procedures, designs, and specifications on file with the commission, submitted to the commission for review at least forty-five days prior to the initiation of construction activity. 480-93-017(2) *****Notes – The pipeline is already in operation. There is no new construction – only pipeline maintenance. *****			X	

MAPS, DRAWINGS, and RECORDS of GAS FACILITIES			**S**	**U**	**N/A**	**N/C**
280.	480-93-180(1)	Records updated no later than **6 months** from completion of construction activity and made available to appropriate personnel. 480-93-018(3) *****Notes – No construction activity occurs or has occurred on this system. Maps and records are available to in plant (non-covered) employees and OQ covered pipeline maintenance staff*****			X	

PROXIMITY CONSIDERATIONS			**S**	**U**	**N/A**	**N/C**
281.	480-93-180(1)	Each operator must submit a written request and receive commission approval prior to: Operating any gas pipeline facility at greater than five hundred psig that is within five hundred feet of any of the following places: 480-93-20 (1)(a) • A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or : 480-93-20 (1)(a)(i) • A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission; or : 480-93-20(1)(a)(ii) • A public highway, as defined in RCW 81.80.010(3). 480-93-20 (1)(a)(iii) *****Notes – The pipeline system is not capable of operating at these pressures given the upstream compressor limitations in its design.*****			X	
282.	480-93-180(1)	Operating any gas pipeline facility at greater than two hundred fifty psig, up to and including five hundred psig, that is operated within one hundred feet of either of the following places: 480-93-20(1)(b) • A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or: 480-93-20(1)(b)(i) • A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission. 480-93-20(1)(b)(ii) For proposed new construction, document evidence to demonstrate that it is not practical to select an alternate route that will avoid areas or which demonstrates that the operator has considered future development of the area and has designed their pipeline facilities accordingly. 480-93-20(2) *****Notes – The pipeline system is not capable of operating at these pressures given the upstream compressor limitations in its design.*****			X	

Attachment 1
Alternative Maximum Allowable Operating Pressure

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

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