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

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

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

Inspection Report			
Inspection ID/Docket number	2624		
Inspector Name & Submit Date	Dennis Ritter 12/13/2012		
Chief Eng Name & Review Date	Joe Subsits, 12/18/2012		
Operator Information			
Name of Operator:	Arco Western Gas Pipe Line Company	**OP ID #:**	570
Name of Unit(s):	Arco Western Gas Pipeline Company		
Records Location:	14789 Ovenell Road, Mount Vernon, WA 98273		
Date(s) of Last (unit) Inspection:	July 13-16, 2009	**Inspection Date(s):**	Nov 26-29, 2012

Inspection Summary:

The Arco Western pipeline receives 100% of its supply from Spectra Energy at the Sumas Station. The pipeline starts at Sumas Station on the US/Canadian Border. Sumas station is approximately 17,250 feet west of the intersection of State Route 9 (in Sumas) and the Canadian Border. This station is tucked between gate stations for Cascade Natural Gas and Puget Sound Energy and is approximately 500 feet from Williams's gas compressor station. From Sumas Station the pipeline zigzags in a generally SW direction until 13250 ft south of the Border. From that point the pipeline proceeds straight West paralleling the Cascade Pipeline. The line turns SW with the Cascade Pipeline to the meter station on the east side of the BP Cherry Point Refinery. After the meter station at the Refinery the pipeline downsizes to an 8-inch and continues south southwest to Alcoa's Intalco aluminum smelter where it ends. The field portion of this inspection started at Sumas and ended at Intalco. All block valve locations (they are virtually identical), terminal points, meter stations and all rectifiers were included in the inspection.

Pipeline does not have a compressor.
Six (6) block valves
Meter and Odorant Injection (at Sumas)
531 psi was operating pressure at Sumas

The following areas of concern were noted during the inspection and discussed at the exit interview.

1. 480-93-188(2)--The operator could not readily produce records showing the leak detection equipment was calibrated per the manufacturer's recommendation or monthly as required. The particular machine the operator uses (Southern Cross Hawk 46) permanently stores calibration data. This information is stored in the detector, however, the operator was unsure how to access it. During the exit interview, the operator stated they will add the downloading of the calibration data process to its procedure.

2. 480-93-188(5)--The operator could not readily produce records indicating which particular piece of equipment was used during the leak survey as required, (although the operator only has one leak detector, the Hawk 46). But the operator stated they were going to purchase a second unit in 2012. Also, the Maximo work order system used by the operator does not have a field which can be easily configured to add this information. During the exit interview, the operator stated they were working on a solution.
3. 480-93-110(3)—the operator could not readily produce records showing the cathodic protection test equipment used for compliance monitoring had been calibrated per the manufacturer's recommendations. The operator stated

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Inspection Summary:

these records were available but they needed to obtain them from their third party contractor who does the annual CP reads.

HQ Address:		**System/Unit Name & Address:**	
Arco Western Gas Pipeline Co. Mail Code 7018 801 Warrenville Road Lisle, IL 60532		Arco Western Gas Pipeline Co. 14789 Ovenell Road Mount Vernon, WA 98273	
Co. Official:	Steve Pankhurst, President	**Phone No.:**	360-424-0365
Phone No.:	630-536-2161	**Fax No.:**	360-848-1484
Fax No.:	630-536-2653	**Emergency Phone No.:**	800-362-6742 (Tulsa)
Emergency Phone No.:	800-362-6742 (Tulsa)		

Persons Interviewed	**Title**	**Phone No.**
Jim Bruen	DOT Compliance Advisor	630-536-2535
Dennis Johnston	Olympic Pipeline Operator/North Core Team Leader	360-424-0365
Kelli Gustaf	Environmental Coordinator	425-235-7743
Nick Kitzmiller	District Corrosion Specialist	206-510-8262
Jim Fraley	Damage Prevention/Public Awareness	
Jim Atwood	E&M Specialist	360-371-5278

UTC staff conducted abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.

(check one below and enter appropriate date)

☐	Team inspection was performed (Within the past five years.) or,	**Date:**	
☒	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	**Date:**	7/16-7/18, 2007

GAS SYSTEM OPERATIONS	
Gas Supplier Spectra Energy	
Number of reportable safety related conditions last year 0	Number of deferred leaks in system 0
Number of non-reportable safety related conditions last year 0	Number of third party hits last year 0
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 36mi total; 2.12 in class 3	

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GAS SYSTEM OPERATIONS			
Operating Pressure(s):		**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:	550 (will increase to 650 in Jan 2013)	812 (class 4 location)	530
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes, 36 miles		
Compressor stations? Use Attachment 4.	0		

Pipe Specifications:			
Year Installed (Range)	1990	Pipe Diameters (Range)	16 & 8
Material Type	steel	Line Pipe Specification Used	API 5L X65 (16”) and X42(8”)
Mileage	16”-31.7; 8”-4.5	SMYS %	27 (will be 32 with increase to 650)
Supply Company	United States Steel Corp	Class Locations	1,2,3

Integrity Management Field Validation

Important: Per PHMSA, IMP Field Verification Form 16 (Rev 6/18/2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at http://primis.phmsa.dot.gov/gasimp/home.gim **Date Uploaded:** 12/19/2012

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

PART 192 Implement Applicable Control Room Management Procedures		S	U	NA	NC
.605(b)(12)	Implementing the applicable control room management procedures required by 192.631. (Amdt. 192- 112, 74 FR 63310, December 3, 2009, eff. 2/1/2010).	X			

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b) ADB-08-07	**Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002** Updates to NMPS: 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.	X			
2.	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?	X			
3.	191.5	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. No incidents			X	
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	X			
5.	191.15(a)	Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe? No incidents			X	
6.	191.15(c)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe? No incidents			X	

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		REPORTING RECORDS	**S**	**U**	**N/A**	**N/C**
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(**NOTE**: June 15, 2011 for the year 2010).* (Amdt. 192-115, 75 FR 72878, November 26, 2010). Received March 9, 2012	X			
8.	191.23	Have complete and accurate Annual Reports been submitted?	X			
9.	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery No safety related conditions			X	
10.	191.27(a), (b)	Do records indicate reports were submitted within 60 days of completing inspections of underwater pipelines? No underwater pipelines			X	
11.	192.727(g)	Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? No abandoned pipelines			X	
12.	480-93-200(1)	Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9146** (Within **2 hours**) for events which **(regardless of cause)**; **No events to report since last inspection**				
13.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization;			X	
14.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; **Note:** Report all damages regardless if claim was filed with pipeline company or not.			X	
15.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas;			X	
16.	480-93-200(1)(d)	Results in the unintentional ignition of gas;			X	
17.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;			X	
18.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;			X	
19.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or			X	
20.	480-93-200(2)	Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9146** (Within **24 hours**) for;			X	
21.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			X	
22.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;			X	
23.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
24.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP			X	

Comments:

25.	480-93-200(5)	Written incident reports (within 30 days) including the following; **No events to report since last inspection**	**S**	**U**	**N/A**	**N/C**
26.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;			X	
27.	480-93-200(4)(b)	The extent of injuries and damage;			X	
28.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;			X	

			S	U	N/A	N/C
29.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;			X	
30.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
31.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;			X	
32.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;			X	
33.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;			X	
34.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;			X	
35.	480-93-200(4)(j)	Line type;			X	
36.	480-93-200(4)(k)	City and county of incident; and			X	
37.	480-93-200(4)(l)	Any other information deemed necessary by the commission.			X	
38.	480-93-200(5)	Submit a supplemental report if required information becomes available			X	
39.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any **incident or hazardous condition** due to **construction defects or material failure No incidents or hazardous conditions to report since last inspection**			X	

Comments:

40.	480-93-200(7)	**Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year	**S**	**U**	**N/A**	**N/C**
41.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
42.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;	X			
43.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field;	X			
44.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and	X			
45.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: No third party damage (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other			X	
46.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: No material defects or material failures (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.			X	
47.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
48.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. No construction			X	
49.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

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CONSTRUCTION RECORDS **No construction since last inspection**			**S**	**U**	**N/A**	**N/C**
50.	192.225	Do records indicate weld procedures are being qualified in accordance with §192.225?			X	
51.	192.227	Do records indicate adequate qualification of welders?			X	
52.	192.241(a)	Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)?			X	
53.	192.243(b)(2)	Do records indicate the qualification of nondestructive testing personnel?			X	
54.	192.243(c)	Do records indicate that NDT implementation is adequate?			X	
55.	192.243(f)	Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?			X	
56.	192.243(f)	Number of Welds Inspected by NDT			X	
57.	192.243(f)	Number of Welds Rejected			X	
58.	192.243(f)	Disposition of each Weld Rejected			X	
59.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			X	
60.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
61.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main			X	
62.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
63.	192.303	Construction Specifications			X	
64.	192.325	Do records indicate pipe is installed with clearances in accordance with §192.325, and (if plastic) installed as to prevent heat damage to the pipe?			X	
65.	192.327	Amount, Location, Cover of each size of pipe installed			X	
66.	192.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) does it meet the additional construction requirements for: • Quality assurance • Girth welds • Depth of cover • Initial strength testing, and; • Interference currents?			X	
67.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length			X	
68.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines			X	
69.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule)			X	
70.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig			X	
71.	192.455	Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?	X			

Comments:

OPERATIONS and MAINTENANCE RECORDS	**S**	**U**	**N/A**	**N/C**

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		OPERATIONS and MAINTENANCE RECORDS	**S**	**U**	**N/A**	**N/C**
72.	192.10	Do records indicate specific point(s) at which operating responsibility transfers to a producing operator, as applicable? Not a producing operator.			X	
73.	192.14	**Conversion To Service Performance and Records No conversions to service**				
74.	192.14(a)(2)	Visual inspection of right of way, aboveground and selected underground segments			X	
75.	192.14(a)(3)	Correction of unsafe defects and conditions			X	
76.	192.14(a)(4)	Pipeline testing in accordance with Subpart J			X	
77.	192.14(b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline)			X	
78.	192.16	Customer Notification (**Verification – 90 days – and Elements**) **No customers with service lines—transmission only**			X	
79.	192.603(b)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) .605(a) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09	X			
80.	192.603(b)	Did personnel respond to indications of abnormal operations as required by procedures? .605(c) (1)	X			
81.	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3)	X			
82.	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8)	X			
83.	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4)	X			
84.	192.603(b)	Do records indicate systematic and routine testing and inspection of pipe-type or bottle-type holders? .605(b)(10) No pipe or bottle type holders			X	
85.		**Damage Prevention Program**				
86.	192.603(b)	List of Current Excavators .614 (c)(1)	X			
87.	192.603(b)	Notification of Public/Excavators .614 (c)(2)	X			
88.	192.603(b)	Notifications of planned excavations. (One -Call Records) .614 (c)(3)	X			
89.	.614(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
90.		1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline?	X			
91.		2. In the case of blasting, does the inspection include leakage surveys? (required) No blasting			X	
92.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample.	X			
93.	195.507(b)	Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? Probe as part of locating pipeline.	X			
94.	480-93-250 RCW 19.122.053	Has the operator subscribed to the UTC Virtual Damage Information Reporting Tool (DIRT)? **Mandatory reporting required effective 1/1/2013**. Operator may register at https://identity.damagereporting.org/cgareg/control/login.do	**Y/N**	Y		
95.	PHMSA – State Program Evaluation Questions	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) as part of normal work practice, BP does check with their locators to see accuracy of locates but no formal written practice.			X	
96.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? No contract services for locates			X	
97.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? No contract services for locates			X	
98.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
99.		Review operator locating and excavation procedures for compliance with state law and regulations. Procedures OK. Probing--OQ study guide for qualification.	X			

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100.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
101.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? James Atwood, OK.	X			
102.	192.709	Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? 192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))	X			
103.	192.605(a)	Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08. .611 No change in MAOP based on class location.			X	
104.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) **Note:** Review operator records of previous accidents and failures including third-party damage and leak response			X	
105.	192.615	Actions required to be taken by a controller during an emergency in accordance with 192.631. (Amdt. 192-112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). .615(a)(11)			X	
106.	192.603(b)	Location Specific Emergency Plan .615(b)(1)	X			
107.	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2)	X			
108.	192.603(b)	Employee Emergency activity review, determine if procedures were followed. .615(b)(3), No emergency activities			X	
109.	192.603(b)	Liaison Program with Public Officials .615(c)	X			

Comments:

.

		Public Awareness Program .616	S	U	N/A	N/C
	192.603(b)	Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.				
		API RP 1162 Baseline* Recommended Message Deliveries				

Stakeholder Audience (Natural Gas Transmission Line Operators)	Baseline Message Frequency (starting from effective date of Plan)
Residents Along Right-of-Way and Places of Congregation	2 years
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual
One-Call Centers	As required of One-Call Center

* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.

			S	U	N/A	N/C
110.	192.603(b)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .616(d) (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with the unintended release from a gas pipeline facility (3) Physical indications of a possible release; (4) Steps to be taken for public safety on the event of a gas pipeline release; and (5) Procedures to report such an event (to the operator).	X			

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111. **112.**		Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). .616 (e) & (f) zip codes/addresses Whatcom, Bellingham, Ferndale	X			
113.		The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. .616(g) 10% or more along route based census and zip code.	X			
114.		Do records indicate implementation of a program evaluation process implemented and continuous improvements based on the findings? 192.616(i) (192.616(h); API RP 1162, Section 2.7 Step 11; API RP 1162, Section 8) Annual BP meeting in Tulsa, and local training with Jim Fraley, increased face to face with folks along pipeline-especially farmers.	X			
115.		Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 **Note:** Including excavation damage (PHMSA area of emphasis) No accidents since last inspection			X	

Comments:

<table>
<tr><td>116.</td><td>192.517</td><td>From the review of the results of pressure tests, do the test records validate the pressure test? Original pipe hydro test to 90% SMYS</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>117.</td><td>.553(b)</td><td>Do records indicate the pressure uprating process was implemented per the requirements of 192.553? No uprating.</td><td></td><td></td><td>X</td><td></td></tr>
<tr><td>118.</td><td>192.709</td><td>Maximum Allowable Operating Pressure (MAOP)</td><td colspan="4" rowspan="3"></td></tr>
<tr><td>119.</td><td rowspan="3">.709</td><td>Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.</td></tr>
<tr><td>120.</td><td>MAOP cannot exceed the lowest of the following: .619</td></tr>
<tr><td>121.</td><td>Design pressure of the weakest element, .619(a)(1)</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>122.</td><td>.709</td><td>The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in the second column, unless the segment was tested in according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. .619(a)(3)
Pipeline constructed in 1990, meets 49 CFR 192.619
<table>
<tr><th>Pipeline segment</th><th>Pressure date</th><th>Test date</th></tr>
<tr><td>-Onshore gathering line that first became subject to this part (other than §192.612) after April 13, 2006.</td><td>March 15, 2006, or date line becomes subject to this part, whichever is later.</td><td>5 years preceding applicable date in second column.</td></tr>
<tr><td>Offshore gathering lines</td><td>July 1, 1976</td><td>July 1, 1971</td></tr>
<tr><td>All other pipelines</td><td>July 1, 1970</td><td>July 1, 1965</td></tr>
</table></td><td></td><td></td><td>X</td><td></td></tr>
</table>

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123.		.619(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with §192.611. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. **For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. Pipeline constructed in 1990, meets 49 CFR 192.619**			X	
124.		.620 If the pipeline is designed to the alternative MAOP standard in 192.620 does it meet the additional design requirements for: **Pipeline constructed in 1990, meets 49 CFR 192.619** • General standards • Fracture control • Plate and seam quality • Mill hydrostatic testing • Coating • Fittings and flanges • Compressor stations Final rule pub. 10/17/08, eff. 12/22/08			X	
125.	480-93-015(1)	Odorization of Gas – Concentrations adequate?	X			
126.	480-93-015(2)	Monthly Odorant Sniff Testing	X			
127.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements No low reads since last inspection			X	
128.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
129.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months) None attached to bridges**			X	
130.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days? No markers replaced**			X	

Comments:

131.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained No leaks			X	
132.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained No leaks			X	
133.	480-93-187	Gas Leak records - Content No leaks			X	
134.	480-93-188(1)	Gas Leak surveys - Coverage No leaks			X	
135.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mcft rec or monthly not to exceed 45 days)	X			
136.	480-93-188(3)	Leak survey frequency **(Refer to Table Below) Actually done every quarter, procedure states 2X per year.**	X			

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

137.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs No special leak surveys			X	

			S	U	N/A	N/C
138.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred No special leak surveys			X	
139.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected No special leak surveys			X	
140.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions No special leak surveys			X	
141.	480-93-188(5)	Gas survey records: Retention/Content Equipment used for each quarterly survey is not recorded however, they only have one piece of equipment	X			
142.	480-93-188(6)	Leak Survey Program/Self Audits No leaks, no self-audits			X	
143.	192.709	Patrolling (**Refer to Table Below**) .705	X			

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	**2/yr (7½ months)**	**1/yr (15 months)**
3	**4/yr (4½ months)**	**2/yr (7½ months)**
4	**4/yr (4½ months)**	**4/yr (4½ months)**

			S	U	N/A	N/C
144.	192.709	Leak Surveys (**Refer to Table Below**) .706	X			

Class Location	Required	Not Exceed
1 and 2	**1/yr**	**15 months**
3	**2/yr**	**7½ months**
4	**4/yr**	**4½ months**

			S	U	N/A	N/C
145.	192.605(b)	Abandoned Pipelines; Underwater Facility Reports .727(g) No abandoned pipelines			X	
146.	192.709	Compressor Station Relief Devices – Inspection and Testing (**1 per yr/15 months**) .731(a) No compressor stations			X	
147.	192.709	Compressor Station Emergency Shutdown (**1 per yr/15 months**) .731(c) No compressor stations			X	
148.	192.709	Compressor Stations – Detection and Alarms (**Performance Test**) .736(c) No compressor stations			X	
149.	192.709	Pressure Limiting and Regulating Stations – Inspection and Testing intervals (**1 per yr/15 months**) .739 No limiting or reg stations			X	
150.	192.709	Pressure Limiting and Regulator Stations – Capacity Testing or Review (**1 per yr/15 months**) .743 No limiting or reg stations			X	

Comments:

			S	U	N/A	N/C
151.	192.709	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? (**1 per yr/15 months**) .745	X			
152.	192.709	Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? **(1 per yr/15 months**) .749, No vaults			X	
153.	192.603(b)	Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? .751	X			
154.	192.603(b)	Welding – Procedures .225(b)	X			

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155.	192.603(b)	Welding – Welder Qualification .227/.229	X			
156.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2)	X			
157.	192.709	NDT Records (**Pipeline Life**) .243(f)	X			
158.	192.709	Repair: pipe (**Pipeline Life**); Other than pipe (**5 years**) No repairs on pipeline			X	
159.	.807(b)	Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (Including new construction activities - WAC 480-93-013)	X			
160.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's)	X			

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
161.	192.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel.	X			
162.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)*	X			
163.	192.491(c)	Do records document that each buried or submerged pipeline that **has been converted to gas service and was installed after July 31, 1971**, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? No conversions to service			X	
164.	192.491	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**) .465(a)	X			
165.	192.491	Do records indicate the location of all items listed in 192.491(a)?	X			
166.	192.491	Examination of Buried Pipe when Exposed .459 Pipe not exposed since last inspection			X	
167.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed Pipe not exposed since last inspection			X	
168.	192.491	Rectifier Monitoring (**6 per yr/2½ months**) .465(b)	X			
169.	192.491	Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c) No Interference Bond			X	
170.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c)) No Interference Bond			X	
171.	192.491	Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? (**1 per 3 cal yr/39 months**) .465(e) No areas of active corrosion			X	
172.	192.491	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? (**Including Casings**) .467	X			
173.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) No remedial action necessary			X	
174.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) BP will produce Allegro chip purchase dates.	X			
175.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
176.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods			X	
177.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days			X	
178.	480-93-110(5)(c)	Casing shorts cleared when practical			X	

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		CORROSION CONTROL RECORDS	**S**	**U**	**N/A**	**N/C**
179.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months			X	
180.	192.491	Do records document that pipelines with cathodic protection have **electrical test leads installed** in accordance with requirements of Subpart I? (192.471; 192.469)	X			
181.	192.491	Do records document that the operator has minimized the detrimental effects of stray currents when found? .473 Intalco	X			
182.	192.491	Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? .475(a) No corrosive gas			X	
183.	192.491	Internal corrosion; Internal surface inspection; Pipe replacement .475(b)	X			
184.	192.491	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems . (192.476(b); 192.476(c)) No internal corrosion or corrosive gas			X	
185.	192.491	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) .477 No internal corrosion or corrosive gas			X	
186.	192.491	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481	X			
187.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions, Records adequate? .483/.485			X	

Comments:

		PIPELINE INSPECTION (Field)	**S**	**U**	**N/A**	**N/C**
188.	192.161	Supports and anchors	X			
189.	192.179	Valves installed as required? (Proper spacing, Readily accessible, Properly supported, Protection from Tampering/Damage, Blowdown-Discharge/Capacity)	X			
190.	480-93-015(1)	Odorization levels	X			
191.	192.463(a)	Levels of Cathodic Protection	X			
192.	192.465(b)	Rectifiers	X			
193.	192.467	CP - Electrical Isolation (192.467(a), (b), (c)) at gate station	X			
194.	192.469	Test Stations (Sufficient Number)	X			
195.	192.476	Systems designed to reduce internal corrosion No internal corrosion	X			
196.	192.479	Pipeline Components Exposed to the Atmosphere (192.479(a), (b), (c))	X			
197.	192.481	Atmospheric Corrosion – monitoring (192.481(b), (c))	X			
198.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992)	X			
199.	192.605	Knowledge of Operating Personnel	X			
200.	192.613; .703	Pipeline condition, unsatisfactory conditions, hazards, etc. captured and addressed? (192.613(a), (b); 192.703(a), (b), (c))	X			
201.	480-93-124	Pipeline Markers: Placed and maintained at above/below ground facilities. Road and railroad crossings (192.707(a))	X			
202.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**) (192.719(a), (b)) both 16" and 8" stored at Sumas. Pipe is filled with nitrogen.	X			
203.	192.739	Pressure Limiting and Regulating Devices (**Mechanical**) (spot-check field installed equipment vs. inspection records) (192.739(a), (b); 192.743)No pressure limiting or			X	

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PIPELINE INSPECTION (Field)			**S**	**U**	**N/A**	**N/C**
		regulating devices on pipeline				
204.	192.743	Pressure Limiting and Regulating Devices (**Capacities**) (spot-check field installed equipment vs. inspection records))No pressure limiting or regulating devices on pipeline			X	
205.	192.745	Valve Maintenance: Field Inspection and partial operation (192.745(a), (b))	X			
206.	192.751	Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition. 192.7(a), (b), (c)) No construction observed. Did review hot work permits to ensure permit process is robust.			X	
207.	192.801 - 192.809	Operator qualification questions – Refer to OQ Field Inspection Protocol Form	X			

Operator Qualification Field Validation
Important: Per PHMSA, the OQ Field Inspection Protocol Form 15 (Rev 6-2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq **Date Form Completed/Uploaded?:** 12/18/2012

Comments:

COMPRESSOR STATIONS INSPECTION **No Compressor station** (Note: Facilities may be "Grandfathered") **If not located on a platform check here and skip 192.167(c)**		**S**	**U**	**N/A**	**N/C**
192.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
	Door latch must open from inside without a key			X	
	Doors must swing outward			X	
(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
	Each gate located within 200 ft of any compressor plant building must open outward			X	
	When occupied, the door must be opened from the inside without a key			X	
(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?**			X	
.165(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
.165(b)	Do the liquid separators have a manual means of removing liquids?			X	
	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
.167(a)	ESD system must:				
	- Discharge blowdown gas to a safe location			X	
	- Block and blowdown the gas in the station			X	
	- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
	- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
	ESD system must be operable from at least two locations, each of which is:				
	- Outside the gas area of the station			X	

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	COMPRESSOR STATIONS INSPECTION **No Compressor station** (Note: Facilities may be "Grandfathered") **If not located on a platform check here and skip 192.167(c)**	**S**	**U**	**N/A**	**N/C**
	- Not more than 500 feet from the limits of the station			X	
	- ESD switches near emergency exits?			X	
.167 (b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
.167(c)	Are ESDs on platforms designed to actuate automatically by…				
	- For unattended compressor stations, when:				
	▪ The gas pressure equals MAOP plus 15%?			X	
	▪ An uncontrolled fire occurs on the platform?			X	
	- For compressor station in a building, when				
	▪ An uncontrolled fire occurs in the building?			X	
	▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to **NEC Class 1, Group D** is not a source of ignition)?			X	
.171(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
.173	Is each compressor station building adequately ventilated?			X	
.457	Is all buried piping cathodically protected?			X	
.481	Atmospheric corrosion control of aboveground facilities 192.481(b), (c); 192.479(a), (b), (c))			X	
.605	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? 192.605(b)(5)			X	
	Are facility maps current/up-to-date? 192.605(b)(3)			X	
.616	Public Awareness Program effectiveness - Visit identified stakeholders as part of field inspection routine			X	
.605; .615(b)	Emergency Plan for the station on site?			X	
.707	Markers			X	
.199/.731	Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (192.199, 192.731(a), (b), (c))			X	
.735(a), (b)	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
	Are aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30?**			X	
.736(a), (b)	Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?			X	

Comments:

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Alternative Maximum Allowable Operating Pressure

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

For Additional guidance see the FAQs at http://primis.phmsa.dot.gov/maop/faqs.htm

192.620		Alternative MAOP Procedures and Verifications No alternative MAOP	S	U	N/A	N/C
		The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with: Class Location — Alternative Design Factor (F) 1 — 0.80 2 — 0.67 3 — 0.56				
.620(a)	(1)	Establish alternative MAOP commensurate with class location – no class 4			X	
	(2)	MAOP cannot exceed the lowest of the following:				
		(i) Design pressure of the weakest element			X	
		(ii) Test pressure divided by applicable factor			X	
.620(b)	(2)	Pipeline constructed of steel pipe meeting additional requirements in §192.112.			X	
	(3)	SCADA system with remote monitoring and control			X	
	(4)	Additional construction requirements described in §192.328			X	
	(5)	No mechanical couplings			X	
	(6)	No failures indicative of systemic material fault – if previously operated at lower MAOP			X	
	(7)	95% of girth welds have NDT			X	
.620(c)	(1)	PHMSA notified 180 days before operating at alternative MAOP			X	
	(2)	Senior Executive signatures and copy to PHMSA			X	
	(4)	Strength test per §192.505 or certify previous strength test			X	
	(6)	Construction tasks treated as covered tasks for Operator Qualification			X	
	(7)	Records maintained for life of system			X	
	(8)	Class location change anomaly remediations			X	
620(d)	(1)	Threat matrix developed consistent with §192.917			X	
	(2)	Recalculate the potential impact circle per §192.903 and implement public education per §192.616			X	
	(3)	Responding to an emergency in an HCA				
		(i) Identify HCAs using larger impact circle			X	
		(ii) Check personnel response times			X	
		(iii) Verify remote valve abilities			X	
		(iv) Verify line break valve control system			X	
	(4)	Protect the right-of-way:				
		(i) ROW patrols 12 per year not to exceed 45 days			X	
		(ii) Plan to identify and mitigate unstable soil			X	
		(iii) Replace loss of cover if needed			X	
		(iv) Use line-of-sight markers per §192.707			X	
		(v) Review damage prevention program in light of national consensus practices			X	
		(vi) ROW management plan to protect against excavation activities			X	
	(5)	Control Internal Corrosion:				

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192.620	**Alternative MAOP Procedures and Verifications** **No alternative MAOP**	**S**	**U**	**N/A**	**N/C**
	(i) Program to monitor gas constituents			X	
	(ii) Filter separators if needed			X	
	(iii) Gas Monitoring equipment used			X	
	(iv) Cleaning pigs, inhibitors, and sample accumulated liquids				
.620(d)	(v) Limit CO2, H2S, and water in the gas stream			X	
	(vi) Quarterly program review based on monitoring results			X	
	(6) (i) Control interference that can impact external corrosion			X	
	(ii) Survey to address interference currents and remedial actions			X	
	(7) Confirm external corrosion control through indirect assessment			X	
	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months				
	(ii) Remediate damage with IR drop > 35%			X	
	(iii) Integrate internal inspection results with indirect assessment			X	
	(iv) Periodic assessments for HCAs			X	
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results				
	(8) Cathodic Protection			X	
	(i) Complete remediations within 6 months of failed reading				
	(ii) Confirm restoration by a close interval survey			X	
	(iii) Cathodic protection system operational within 12 months of construction completion			X	
	(9) Baseline assessment of integrity			X	
	(i)(A) Geometry tool run within 6 months of service				
	(i)(B) High resolution MFL tool run within 3 years of service			X	
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X	
	(iii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X	
	(10) Periodic integrity assessments			X	
	(i) Frequency for assessments determined as if all segments covered by Subpart O				
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X	
	(11) Repairs			X	
	(i)(A) Use of the most conservative calculation for anomaly remaining strength				
	(B) Tool tolerances taken into consideration			X	
	(ii) Immediate repairs for:			X	
	(A) Dents meeting 309(b) criteria				
	(B) Defects meeting immediate criteria in §192.933(d)			X	
	(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X	
	(iii) Repairs within 1 year for:			X	
	(A) Defects meeting 1 year criteria in 933(d)				
	(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X	
	(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X	
	(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X	

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192.620	**Alternative MAOP Procedures and Verifications** **No alternative MAOP**	**S**	**U**	**N/A**	**N/C**
	(1) Provide overpressure protection to a max of 104% MAOP			X	
.620(e)	Does the AMAOP process include overpressure protection requirements?			X	
	Do records indicate that overpressure protection requirements were met?			X	

Comments:

Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

Number	**Date**	**Subject**
ADB-10-08	October 28, 2010	Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

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

Comments: