# 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** | **6220** | | |
| **Inspector Name & Submit Date** | **Anthony Dorrough 08/11/2015** | | |
| **Chief Eng Name & Review Date** | **Joe Subsits 8/11/2015** | | |
| **Operator Information** | | | |
| **Name of Operator:** | **Ferndale Pipeline System** | **OP ID #:** | **570** |
| **Name of Unit(s):** | **Ferndale Pipeline System** | | |
| **Records Location:** | **14789 Ovenell Road, Mount Vernon, WA 98273** | | |
| **Date(s) of Last (unit) Inspection:** | **Nov 26-29, 2012** | **Inspection Date(s):** | **Jul 20-23, 2015** |

**Inspection Summary:**

The 2015 Standard Inspection for the Ferndale Pipeline System (FPS) was conducted in Bellingham at the Hampton Inn Bellingham Airport Hotel (records) and Whatcom county (field). An exit interview was held at the same location to recap any record or field issues. Any issues found are summarized below.

Supply:
FPS continues to receive 100% of its supply from Spectra Energy at the Sumas Station.

Unit Description:
The pipeline starts at Sumas Station on the US/Canadian Border. Sumas station is West of the intersection of State Route 9 (in Sumas) and the Canadian Border. This station is located between gate stations for Cascade Natural Gas and Puget Sound Energy and is within 500-ft. of Williams's gas compressor station. From Sumas Station the pipeline is laid out in a SW direction until just South of the Border. From that point the pipeline proceeds West paralleling the Cascade Pipeline. The line then turns SW to the meter station on the East side of the BP Cherry Point Refinery. After the meter station at the Refinery the pipeline continues South Southwest to Alcoa's Intalco aluminum smelter.

The inspection started at the Sumas gate station (MP 0) and terminated at the Alcoa Intalco aluminum smelter in Ferndale (MP 36.2, the end of the pipeline). All block valve locations were inspected and CP readings were taken. Rectifier #200 was inspected and CP readings taken. All terminus points were inspected (Cherry Point and Intalco). There are three HCA areas along the 36.2 mile length of the pipeline. One is the contractor parking and trailer area at the BP refinery; the second is strip commercial area in Ferndale near the crossing with I-5; and the third is a large greenhouse complex within 100 yards of the pipeline near Lynden. Two of the HCAs identified by the operator were visited during this inspection. All are properly classified as HCAs.

All block valves except Block Valve 2 were operated manually to the closed position by imparting a pressure differential across the valve (it auto closes when it senses a 50 psi difference). All valves shut properly. The Tulsa control center remotely shut all of the valves and again they worked properly. All CP reads were OK per the criteria--greater (negative) than -850mV and all reads at rectifiers were acceptable. Records also indicated no issues.

THE FOLLOWING ISSUE WAS NOTED DURING THE INSPECTION AND DISCUSSED AT THE EXIT INTERVIEW:

Staff observed, at Sumas when gas is flowing, intermittently at certain pressure conditions, the odorizer did not inject into the system. This lead staff to ask the question "How does FPS know that the required 1/5th Mercaptan level in the pipeline is being met?" During the exit interview FPS addressed the question, stating the fact that they take readings at the Intalco Meter Station at the end of the pipeline system and adjust the levels accordingly as needed. Staff acknowledged that staff could detect the smell of Mercaptan at each block valve when it was operated, so it was assumed that FPS's method of monitoring these levels is working adequately.

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| HQ Address: | System/Unit Name & Address: |
|---|---|
| BP Pipelines (North America) Inc.<br>150 W. Warrenville Road<br>Naperville, IL 60563 | |
| Co. Official: John Newhouse<br>Phone No.: 630-536-2549<br>Fax No.:<br>Emergency Phone No.: | Phone No.:<br>Fax No.:<br>Emergency Phone No.: |

| Persons Interviewed | Title | Phone No. |
|---|---|---|
| John Newhouse | DOT Compliance Advisor | 630-536-2549 |
| Jim Bruen | DOT Team Leader - Programs | 630-536-2535 |
| Joe Fraley | North Area Core Team Lead | 360-428-4214 |
| Larry Stansifer | Damage Prevention Standard Coordinator | 918-660-4360 |
| Terry Berry | Aviation Document Coordinator | 918-660-4265 |
| Charlene Henning | Olympic North O&M Administrator | 360-428-4214 ext. 6005 |
| Ross Degerstedt | Corrosion Lead | 425-981-2532 |
| Troy Dellinger | Corrosion Specialist | 425-981-2573 |
| Brian Stone | Corrosion Team Lead | 563-556-1538 |
| | | |

**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:** | |

**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) | | | |
| **Operating Pressure(s):** | | **MAOP (Within last year)** | **Actual Operating Pressure** (At time of Inspection) |
| Feeder: | 650 | 812 (class 4 location) | 530 |
| Town: | | | |
| Other: | | | |
| Does the operator have any transmission pipelines? | Yes [36 miles] | | |
| Compressor stations? Use Attachment 4. | 0 | | |

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| **Pipe Specifications:** | | | |
|---|---|---|---|
| Year Installed (Range) | **1990** | Pipe Diameters (Range) | **16-inch & 8-inch** |
| Material Type | **Steel** | Line Pipe Specification Used | **16-inch API 5L X65**<br>**8-inch X42** |
| Mileage | **16-inch [31.7 miles] 8-inch [4.5 miles]** | SMYS % | **32** |
| Supply Company | United States Steel Corporation | 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:** **08/03/2015** |

| **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)<br><br>ADB-08-07 | **Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002**<br>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 http://portal.phmsa.dot.gov/pipeline unless an alternative reporting method is authorized IAW with paragraph (d) of this section. **---No Incidents** | | | 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 | |
| **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, 2013 for the year 2012).* | X | | | |
| **8.** | 191.22 | Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline | X | | | |
| **9.** | 191.23 | Have complete and accurate Annual Reports been submitted? | X | | | |

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| | | REPORTING RECORDS | S | U | N/A | N/C |
|---|---|---|---|---|---|---|
| **10.** | 191.25<br><br>49 U.S.C. 60139, Subsection (b)(2) | Filing the SRCR within 5 days of determination, but not later than 10 days after discovery.<br>**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.<br><br>The report should be titled ''Gas Transmission MAOP Exceedance'' and provide the following information:<br>• 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.<br>• The name, job title, and business telephone number of the person who determined the condition exists.<br>• The date the condition was discovered and the date the condition was first determined to exist.<br>• 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.<br>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. **---No Incidents** | | | X | |
| **11.** | 191.27(a), (b) | Do records indicate reports were submitted within 60 days of completing inspections of underwater pipelines? **---No Incidents** | | | X | |
| **12.** | 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 Incidents** | | | X | |
| **13.** | 480-93-200(1) | Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9144** (Within **2 hours**) for events which **(regardless of cause)**; **---No Incidents (covers Q13-Q22)** | | | | |
| **14.** | 480-93-200(1)(a) | Result in a fatality or personal injury requiring hospitalization; | | | X | |
| **15.** | 480-93-200(1)(b) | Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars;<br>**Note:** Report all damages regardless if claim was filed with pipeline company or not. | | | X | |
| **16.** | 480-93-200(1)(c) | Results in the evacuation of a building, or high occupancy structures or areas; | | | X | |
| **17.** | 480-93-200(1)(d) | Results in the unintentional ignition of gas; | | | X | |
| **18.** | 480-93-200(1)(e) | Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; | | | X | |
| **19.** | 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 | |
| **20.** | 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 | |
| **21.** | 480-93-200(2) | Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9146** (Within **24 hours**) for; | | | X | |
| **22.** | 480-93-200(2)(a) | The uncontrolled release of gas for more than two hours; | | | X | |
| **23.** | 480-93-200(2)(b) | The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; **---No pipelines taken out of service** | | | X | |
| **24.** | 480-93-200(2)(c) | A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or **---No low pressure drop** | | | X | |
| **25.** | 480-93-200(2)(d) | A pipeline pressure exceeding the MAOP **---No pipeline exceeding MAOP** | | | X | |

**Comments:**

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| | | | S | U | N/A | N/C |
|---|---|---|---|---|---|---|
| **26.** | 480-93-200(5) | Written incident reports (within 30 days) including the following; **---No Incident Reports (Covers Q26 –Q40)** | | | | |
| **27.** | 480-93-200(4)(a) | Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; | | | X | |
| **28.** | 480-93-200(4)(b) | The extent of injuries and damage; | | | X | |
| **29.** | 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 | |
| **30.** | 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 | |
| **31.** | 480-93-200(4)(e) | The date and time the gas pipeline company was first notified of the incident; | | | X | |
| **32.** | 480-93-200(4)(f) | The date and time the ((operators')) gas pipeline company's first responders arrived on-site; | | | X | |
| **33.** | 480-93-200(4)(g) | The date and time the gas ((facility)) pipeline was made safe; | | | X | |
| **34.** | 480-93-200(4)(h) | The date, time, and type of any temporary or permanent repair that was made; | | | X | |
| **35.** | 480-93-200(4)(i) | The cost of the incident to the ((operator)) gas pipeline company; | | | X | |
| **36.** | 480-93-200(4)(j) | Line type; | | | X | |
| **37.** | 480-93-200(4)(k) | City and county of incident; and | | | X | |
| **38.** | 480-93-200(4)(l) | Any other information deemed necessary by the commission. | | | X | |
| **39.** | 480-93-200(5) | Submit a supplemental report if required information becomes available | | | | |
| **40.** | 480-93-200(6) | Written report within 45 days of receiving the failure analysis of any **incident or hazardous condition** due to **construction defects or material failure** | | | X | |

**Comments:**

| | | | | | | |
|---|---|---|---|---|---|---|
| **41.** | 480-93-200(7) | **Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)** **(**Via the commission's Virtual DIRT system or on-line damage reporting form) | | | | |
| **42.** | 480-93-200(7)(a) | Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) | | | X | |
| **43.** | 480-93-200(7)(b) | Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed? **---No Damage Reports** | | | X | |
| **44.** | 480-93-200(7)(c) | Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? **Note:** Records maintained for two years and made available to the commission upon request. **---No Damage Reports** | | | X | |
| **45.** | 480-93-200(8) | Does the operator provide the following information to excavators who damage gas pipeline facilities? **---No Damage Reports** | | | | |
| **46.** | 480-93-200(8)(a) | • Notification requirements for excavators under RCW 19.122.050(1) **---No Damage Reports** | | | X | |
| **47.** | 480-93-200(8)(b) | • A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and **---No Damage Reports** | | | X | |

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| | | | | | | |
|---|---|---|---|---|---|---|
| **48.** | 480-93-200(8)(c) | • 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. **---No Damage Reports** | | | X | |
| **49.** | 480-93-200(9) | **Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities…**<br>• 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)<br>• A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) **---No Damage Reports** | | | X | |
| **50.** | 480-93-200(7) | **Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (**Via the commission's Virtual DIRT system or on-line damage reporting form) **---No Damage Reports** | | | X | |
| **51.** | 480-93-200(10) | **Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year. *(**NOTE**: PHMSA extension to June 15, 2013 for the year 2012).* | **S** | **U** | **N/A** | **N/C** |
| **52.** | 480-93-200(10)(a) | A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety | X | | | |
| **53.** | 480-93-200(10)(b) | Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following:<br>(i) Types and numbers of construction defects; and<br>(ii) Types and numbers of material failures. **---No construction** | | | X | |
| **54.** | 480-93-200(11) | Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities **-Submitted to M. Woodard in 2014** | X | | | |
| **55.** | 480-93-200(12) | Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. **–In the past FPS has called J. Subsits in person or left a message** | | | X | |
| **56.** | 480-93-200(13) | Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required **-Submitted to PHMSA and a copy to M. Woodard** | X | | | |

**Comments:**

| **CONSTRUCTION RECORDS ---No Construction (covers Q57 – Q77)** | | | **S** | **U** | **N/A** | **N/C** |
|---|---|---|---|---|---|---|
| **57.** | 192.225 | Do records indicate weld procedures are being qualified in accordance with §192.225? | | | X | |
| **58.** | 192.227 | Do records indicate adequate qualification of welders? | | | X | |
| **59.** | 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 | |
| **60.** | 192.243(b)(2) | Do records indicate the qualification of nondestructive testing personnel? | | | X | |
| **61.** | 192.243(c) | Do records indicate that NDT implementation is adequate? | | | X | |
| **62.** | 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 | |
| **63.** | 192.243(f) | Number of Welds Inspected by NDT | | | X | |
| **64.** | 192.243(f) | Number of Welds Rejected | | | X | |
| **65.** | 192.243(f) | Disposition of each Weld Rejected | | | X | |
| **66.** | 480-93-080(1)(b) | Use of testing equipment to record and document essential variables | | | X | |
| **67.** | 480-93-115(2) | Test leads on casings (without vents) installed after 9/05/1992 | | | X | |
| **68.** | 480-93-115(3) | Sealing ends of casings or conduits on transmission pipelines and main | | | X | |
| **69.** | 480-93-115(4) | Sealing ends (nearest building wall) of casings or conduits on services | | | X | |

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| | | CONSTRUCTION RECORDS ---No Construction (covers Q57 – Q77) | S | U | N/A | N/C |
|---|---|---|---|---|---|---|
| **70.** | 192.303 | Construction Specifications | | | X | |
| **71.** | 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 | |
| **72.** | 192.327 | Amount, Location, Cover of each size of pipe installed | | | X | |
| **73.** | 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:<br>• Quality assurance<br>• Girth welds<br>• Depth of cover<br>• Initial strength testing, and;<br>• Interference currents? | | | X | |
| **74.** | 480-93-160(1) | Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length | | | X | |
| **75.** | 480-93-170(3) | Pressure Tests Performed on new and replacement pipelines | | | X | |
| **76.** | 480-93-170(10) | Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule) | | | X | |
| **77.** | 480-93-175(1) | Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig | | | X | |
| **78.** | 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 |
|---|---|---|---|---|---|---|
| **79.** | 192.10 | Do records indicate specific point(s) at which operating responsibility transfers to a producing operator, as applicable? **---Operating responsibilities do not transfer to producing operator** | | | X | |
| **80.** | 192.14 | **Conversion To Service Performance and Records ---No Services (covers Q80-Q85)** | | | | |
| **81.** | 192.14(a)(2) | Visual inspection of right of way, aboveground and selected underground segments | | | X | |
| **82.** | 192.14(a)(3) | Correction of unsafe defects and conditions | | | X | |
| **83.** | 192.14(a)(4) | Pipeline testing in accordance with Subpart J | | | X | |
| **84.** | 192.14(b) | Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline) | | | X | |
| **85.** | 192.16 | Customer Notification (**Verification – 90 days – and Elements**) | | | X | |
| **86.** | 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 **–Review OMER procedures on an annual basis FEB 2013 & 2014** | X | | | |
| **87.** | 192.603(b) | Did personnel respond to indications of abnormal operations as required by procedures? .605(c) (1) **–Yes –(2) AOC's - High Analog Pressure Alarm & PLC Table Fault Alarm at Valve #1** | X | | | |
| **88.** | 192.603(b) | Availability of construction records, maps, operating history to operating personnel .605(b)(3) **–DRM Online - Can pull in maps and records, and personnel carries copies with them, what is printed is only good for 24-hours (Data Record Management) – Crews also have a printed out book as reference in their vehicle.** | X | | | |
| **89.** | 192.603(b) | Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8) **- FPS does a review on annual basis of procedures company wide, with training groups.** | X | | | |
| **90.** | 192.603(b) | Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4) **– FPS goes through OMER review in FEB/MAR and go thru any changes or near misses** | X | | | |

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|---|---|---|---|---|---|---|
| **91.** | 192.603(b) | Do records indicate systematic and routine testing and inspection of pipe-type or bottle-type holders? .605(b)(10) - **---No Bottle Type Holders** | | | X | |
| **92.** | | **Damage Prevention Program** | | | | |
| **93.** | 192.603(b) | List of Current Excavators .614 (c)(1) **– from 2014 from Whatcom County and surrounding area approx.. 1,785 total, used for notification mailing** | X | | | |
| **94.** | 192.603(b) | Notification of Public/Excavators .614 (c)(2) **–goes out to public every two years, Paradigm (contractor) compiles the list and manages the mailing.** | X | | | |
| **95.** | 192.603(b) | Notifications of planned excavations. (One -Call Records) .614 (c)(3) **–Reviewed the one call buffer map with 4000 ft. total buffer zone, 2000 ft. on each side of the pipe and the management system Dig Track** | X | | | |
| **96.** | .614(c)(6) | Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities: | | | | |
| **97.** | | 1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline? **–If digging takes place within 25ft they are on site with the crew.** | X | | | |
| **98.** | | 2. In the case of blasting, does the inspection include leakage surveys? (required) - **--- No Blasting** | | | X | |
| **99.** | 480-93-250(3) | Are locates are being made within the timeframes required by RCW 19.122? Examine record sample. **–They do random 5% look each month – staff found 99.2% in compliance** | X | | | |
| **100.** | 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? | | | | |
| **101.** | 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) **–They have Dig track Qualification Checklist, they use QA** | X | | | |
| **102.** | | Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? **---Operator performs their own locating** | | | X | |
| **103.** | | Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? **--- Operator performs their own locating** | | | X | |
| **104.** | | Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? | X | | | |
| **105.** | | Review operator locating and excavation procedures for compliance with state law and regulations. | X | | | |
| **106.** | | Are locates are being made within the timeframes required by state law and regulations? Examine record sample. | X | | | |
| **107.** | | Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? | X | | | |
| **108.** | 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)) **–Conduct a study on an annual basis** | X | | | |
| **109.** | 192.605(a) | Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08. .611 **– Confirming documentation for 16-inch was reviewed by staff /staff reviewed 16-inch Hydrotest** | X | | | |
| **110.** | 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 **---No emergencies** | | | X | |
| **111.** | 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) **--- No emergencies** | | | X | |
| **112.** | 192.603(b) | Location Specific Emergency Plan .615(b)(1) **-Field techs carry a copy of the EM plan and online electronically ERFD 2015- all changes, updates since 2013** | X | | | |
| **113.** | 192.603(b) | Emergency Procedure training, verify effectiveness of training .615(b)(2) **–completed training in 2013 & 2014 in the form of drills and table top exercises on an annual basis** | X | | | |

# 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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| | | OPERATIONS and MAINTENANCE RECORDS | S | U | N/A | N/C |
|---|---|---|---|---|---|---|
| **114.** | 192.603(b) | Employee Emergency activity review, determine if procedures were followed. .615(b)(3) **--- No emergencies** | | | X | |
| **115.** | 192.603(b) | Liaison Program with Public Officials .615(c) **– LEPC meetings all local officials, and discuss issues, drills and lessons across the board, meets on a quarterly basis** | 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. | | | | |
| **116.** | 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)<br>(1) Use of a one-call notification system prior to excavation and other damage prevention activities;<br>(2) Possible hazards associated with the unintended release from a gas pipeline facility<br>(3) Physical indications of a possible release;<br>(4) Steps to be taken for public safety on the event of a gas pipeline release; and<br>(5) Procedures to report such an event (to the operator). | X | | | |
| **117.** | | 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) | X | | | |
| **118.** | | | | | | |
| **119.** | | 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) **-Use 20% as threshhold** | X | | | |
| **120.** | | 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) | X | | | |
| **121.** | | Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617<br>**Note:** Including excavation damage (PHMSA area of emphasis) **---No accidents or failures** | | | X | |

**Comments:**

# Utilities and Transportation Commission
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| | | | | | | |
|---|---|---|---|---|---|---|
| **122.** | 192.517 | From the review of the results of pressure tests, do the test records validate the pressure test? | X | | | |
| **123.** | .553(b) | Do records indicate the pressure uprating process was implemented per the requirements of 192.553? | X | | | |
| **124.** | 192.709 | **Maximum Allowable Operating Pressure (MAOP)** | | | | |
| **125.** | | **Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.** | | | | |
| **126.** | .709 | MAOP cannot exceed the lowest of the following: .619 | | | | |
| **127.** | | Design pressure of the weakest element, .619(a)(1) **–Based on the pipe – not fittings/ Class 600 fittings – limiting is 1231** | X | | | |
| **128.** | | 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) **---No Gathering Lines** | | | X | |
| **129.** | .709 | .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. ---No Gathering Lines** | | | X | |
| **130.** | | .620 If the pipeline is designed to the alternative MAOP standard in 192.620 does it meet the additional design requirements for: **---No Alternate MAOP**<br>• General standards<br>• Fracture control<br>• Plate and seam quality<br>• Mill hydrostatic testing<br>• Coating<br>• Fittings and flanges<br>• Compressor stations Final rule pub. 10/17/08, eff. 12/22/08 | | | X | |
| **131.** | 480-93-015(1) | Odorization of Gas – Concentrations adequate? **– Added at Sumas and checked at Cherry Pt and Intalco – procedure calls for the 1/5th** | X | | | |
| **132.** | 480-93-015(2) | Monthly Odorant Sniff Testing | X | | | |
| **133.** | 480-93-015(3) | Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements **---No concentrations that didn't meet requirements** | | | X | |
| **134.** | 480-93-015(4) | Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) | X | | | |
| **135.** | 480-93-124(3) | Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months)** **---No pipeline attached to bridges** | | | X | |
| **136.** | 480-93-124(4) | Markers reported missing or damaged replaced within **45 days?** | X | | | |

| Pipeline segment | Pressure date | Test date |
|---|---|---|
| -Onshore gathering line that first became subject to this part (other than §192.612) after April 13, 2006. | March 15, 2006, or date line becomes subject to this part, whichever is later. | 5 years preceding applicable date in second column. |
| Offshore gathering lines | July 1, 1976 | July 1, 1971 |
| All other pipelines | July 1, 1970 | July 1, 1965 |

# Utilities and Transportation Commission
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**Comments:**

| | | | | | | |
|---|---|---|---|---|---|---|
| **137.** | 480-93-185(1) | Reported gas leaks investigated promptly/graded/record retained **---No Leaks** | | | X | |
| **138.** | 480-93-185(3) | Leaks originating from a foreign source reported promptly/notification by mail/record retained **– (1) incident where there was reported gas smell at Sumas, was checked, no leaks found** | | | X | |
| **139.** | 480-93-187 | Gas Leak records – Content **---No Leaks** | | | X | |
| **140.** | 480-93-188(1) | Gas Leak surveys – Coverage **–HCA's do twice a year** | X | | | |
| **141.** | 480-93-188(2) | Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) **–Tested monthly and before doing survey** | X | | | |
| **142.** | 480-93-188(3) | Leak survey frequency **(Refer to Table Below)** | X | | | |

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

| | | | | | | |
|---|---|---|---|---|---|---|
| **143.** | 480-93-188(4)(a) | Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs **---No Leaks** | | | X | |
| **144.** | 480-93-188(4)(b) | Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred **---No Leaks** | | | X | |
| **145.** | 480-93-188(4)(c) | Special leak surveys - Unstable soil areas where active gas lines could be affected **– performed survey after discovering sinkhole** | X | | | |
| **146.** | 480-93-188(4)(d) | Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions **---No Leaks** | | | X | |
| **147.** | 480-93-188(4)(e) | Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. **---No Leaks** | | | X | |
| **148.** | 480-93-188(5) | Gas survey records: Retention/Content **– staff reviewed records** | X | | | |
| **149.** | 480-93-188(6) | Leak Survey Program/Self Audits **– look at records on annual basis** | X | | | |
| **150.** | 192.709 | Patrolling (**Refer to Table Below**) .705 –Fly the lines bi-weekly | 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)** |

| | | | | | | |
|---|---|---|---|---|---|---|
| **151.** | 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** |

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

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| | | | | | | |
|---|---|---|---|---|---|---|
| **152.** | 192.605(b) | Abandoned Pipelines; Underwater Facility Reports .727(g) **---No abandoned pipelines** | | | X | |
| **153.** | 192.709 | Compressor Station Relief Devices – Inspection and Testing (**1 per yr/15 months**) .731(a) **----No Compressor Stations** | | | X | |
| **154.** | 192.709 | Compressor Station Emergency Shutdown (**1 per yr/15 months**) .731(c) **----No Compressor Stations** | | | X | |
| **155.** | 192.709 | Compressor Stations – Detection and Alarms (**Performance Test**) .736(c) **----No Compressor Stations** | | | X | |
| **156.** | 192.709 | Pressure Limiting and Regulating Stations – Inspection and Testing intervals (**1 per yr/15 months**) .739 **----No Compressor Stations** | | | X | |
| **157.** | 192.709 | Pressure Limiting and Regulator Stations – Capacity Testing or Review (**1 per yr/15 months**) .743 **FPS uses complex valve system to regulate pressure** | X | | | |

**Comments:**

| | | | | | | |
|---|---|---|---|---|---|---|
| **158.** | 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 | | | |
| **159.** | 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 | |
| **160.** | 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 | | | |
| **161.** | 192.603(b) | Welding – Procedures .225(b) **---No Welding** | | | X | |
| **162.** | 192.603(b) | Welding – Welder Qualification .227/.229 **---No Welding** | | | X | |
| **163.** | 192.603(b) | NDT – NDT Personnel Qualification .243(b)(2) **---Yes (Ken Gula)** | X | | | |
| **164.** | 192.709 | NDT Records (**Pipeline Life**) .243(f) | X | | | |
| **165.** | 192.709 | Repair: pipe (**Pipeline Life**); Other than pipe (**5 years**) **–Looked at recoat repair from 2013** | X | | | |
| **166.** | .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 | | | |
| **167.** | 192.905(c) | Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) – completed on an annual basis **– Personnel drives the line and reports any changes – Staff reviewed documents** | X | | | |

**Comments:**

| **CORROSION CONTROL RECORDS** | | | **S** | **U** | **N/A** | **N/C** |
|---|---|---|---|---|---|---|
| **168.** | 192.453 | CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel. | X | | | |
| **169.** | 192.455(a)(2) | CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)* | X | | | |

# Utilities and Transportation Commission
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| CORROSION CONTROL RECORDS | | | S | U | N/A | N/C |
|---|---|---|---|---|---|---|
| **170.** | 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 pipeline that has been converted** | | | X | |
| **171.** | 192.491 | Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**) .465(a) **---No short sections** | | | X | |
| **172.** | 192.491 | Do records indicate the location of all items listed in 192.491(a)? –ILI repair | X | | | |
| **173.** | 192.491 | Examination of Buried Pipe when Exposed .459 | X | | | |
| **174.** | 480-93-110(8) | CP test reading on all exposed facilities where coating has been removed **-3000mV** | X | | | |
| **175.** | 192.491 | Rectifier Monitoring (**6 per yr/2½ months**) .465(b) **–(2) Rectifiers total** | X | | | |
| **176.** | 192.491 | Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c) **–No Critical Bonds** | | | X | |
| **177.** | 192.491 | Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c) **–At Kickerville Rd** | X | | | |
| **178.** | 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 pipeline without cathodic protection** | | | X | |
| **179.** | 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 | | | |
| **180.** | 480-93-110(2) | Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) **–TS 78 was destroyed and repaired the same day** | X | | | |
| **181.** | 480-93-110(3) | CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) **- FPS uses local Tektronix Lab in Kent** | X | | | |
| **182.** | 480-93-110(5) | Casings inspected/tested annually not to exceed fifteen months | X | | | |
| **183.** | 480-93-110(5)(a) | Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods **---No Casing without test leads** | | | X | |
| **184.** | 480-93-110(5)(b) | Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days **---No Shorted Casing** | | | X | |
| **185.** | 480-93-110(5)(c) | Casing shorts cleared when practical **---No Shorted Casing** | | | X | |
| **186.** | 480-93-110(5)(d) | Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months **---No Shorted Casing** | | | X | |
| **187.** | 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 | | | |
| **188.** | 192.491 | Do records document that the operator has minimized the detrimental effects of stray currents when found? .473 **–PSP readings were reviewed by staff** | X | | | |
| **189.** | 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 | |
| **190.** | 192.491 | Internal corrosion; Internal surface inspection; Pipe replacement .475(b) **---No Internal Corrosion** | | | X | |
| **191.** | 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** | | | X | |
| **192.** | 192.491 | Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) **---No Internal Corrosion** .477 | | | X | |
| **193.** | 192.491 | Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481 | X | | | |
| **194.** | 192.491 | Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions, Records adequate? .483/.485 **---No replaced or repaired pipe** | | | X | |

**Comments:**

# Utilities and Transportation Commission
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**Comments:**

| PIPELINE INSPECTION (Field) | | | S | U | N/A | N/C |
|---|---|---|---|---|---|---|
| **195.** | 192.161 | Supports and anchors | X | | | |
| **196.** | 192.179 | Valves installed as required? (Proper spacing, Readily accessible, Properly supported, Protection from Tampering/Damage, Blowdown-Discharge/Capacity) | X | | | |
| **197.** | 480-93-015(1) | Odorization levels **– See area of concern at beginning of worksheet** | X | | | |
| **198.** | 192.463(a) | Levels of Cathodic Protection | X | | | |
| **199.** | 192.465(b) | Rectifiers | X | | | |
| **200.** | 192.467 | CP - Electrical Isolation (192.467(a), (b), (c)) | X | | | |
| **201.** | 192.469 | Test Stations (Sufficient Number) | X | | | |
| **202.** | 192.476 | Systems designed to reduce internal corrosion | X | | | |
| **203.** | 192.479 | Pipeline Components Exposed to the Atmosphere (192.479(a), (b), (c)) | X | | | |
| **204.** | 192.481 | Atmospheric Corrosion – monitoring (192.481(b), (c)) | X | | | |
| **205.** | 480-93-115(2) | Casings – Test Leads (Casings w/o vents installed after 9/05/1992) | X | | | |
| **206.** | 192.605 | Knowledge of Operating Personnel | X | | | |
| **207.** | 192.613; .703 | Pipeline condition, unsatisfactory conditions, hazards, etc. captured and addressed? (192.613(a), (b); 192.703(a), (b), (c)) | X | | | |
| **208.** | 480-93-124 | Pipeline Markers: Placed and maintained at above/below ground facilities. Road and railroad crossings (192.707(a)) | X | | | |
| **209.** | 192.719 | Pre-pressure Tested Pipe (**Markings and Inventory**) (192.719(a), (b)) **–Stored at Sumas location** | X | | | |
| **210.** | 192.739 | Pressure Limiting and Regulating Devices (**Mechanical**) (spot-check field installed equipment vs. inspection records) (192.739(a), (b); 192.743) **–Ferndale uses valves in a complex but effective way to regulate pressure in the pipeline** | X | | | |
| **211.** | 192.743 | Pressure Limiting and Regulating Devices (**Capacities**) (spot-check field installed equipment vs. inspection records) **–Ferndale uses valves in a complex but effective way to regulate pressure in the pipeline** | X | | | |
| **212.** | 192.745 | Valve Maintenance: Field Inspection and partial operation (192.745(a), (b)) | X | | | |
| **213.** | 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)) | X | | | |
| **214.** | 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?:**

**Comments:**

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| | **COMPRESSOR STATIONS INSPECTION – NO COMPRESSOR STATIONS (covers this entire section)**<br>(Note: Facilities may be "Grandfathered")<br>**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 | |
| | - 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 | |

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| **COMPRESSOR STATIONS INSPECTION – NO COMPRESSOR STATIONS (covers this entire section)**<br>(Note: Facilities may be "Grandfathered")<br>**If not located on a platform check here and skip 192.167(c)** | | **S** | **U** | **N/A** | **N/C** |
|---|---|---|---|---|---|
| | 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:**

## 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 (covers this section)** | **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:<br><br>Class Location — Alternative Design Factor (F)<br>1 — 0.80<br>2 — 0.67<br>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 | |

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| | | | | | | |
|---|---|---|---|---|---|---|
| 192.620 | **Alternative MAOP Procedures and Verifications – NO Alternative MAOP (covers this section)** | | **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:<br><br>Class Location — Alternative Design Factor (F)<br>1 — 0.80<br>2 — 0.67<br>3 — 0.56 | | | | | |
| | (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: | | | | |
| | | (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 | |

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| | **Alternative MAOP Procedures and Verifications – NO Alternative MAOP (covers this section)** | **S** | **U** | **N/A** | **N/C** |
|---|---|---|---|---|---|
| 192.620 | 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:<br><br>Class Location — Alternative Design Factor (F)<br>1 — 0.80<br>2 — 0.67<br>3 — 0.56 | | | | |
| | (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 | |
| | (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:**

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

| Number | Date | Subject |
|---|---|---|
| ADB-2013-07 | July 12, 13 | Potential for Damage to Pipeline Facilities Caused by Flooding |
| ADB-2012-10 | Dec 5, 12 | Using Meaningful Metrics in Conducting Integrity Management Program Evaluations |
| ADB-2012-09 | Oct 11, 12 | Communication During Emergency Situations |
| ADB-2012-08 | Jul 31, 12 | Inspection and Protection of Pipeline Facilities After Railway Accidents |
| ADB-12-07 | Jun 11, 12 | Mechanical Fitting Failure Reports |
| ADB-12-06 | May 7, 12 | Verification of Records establishing MAOP and MOP |
| ADB-12-05 | Mar 23, 12 | Cast Iron Pipe (Supplementary Advisory Bulletin) |
| ADB -12-04 | Mar 21, 12 | Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators |
| ADB-12-03 | Mar 6, 12 | Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation |
| ADB-11-05 | Sep 1, 11 | Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes |
| ADB-11-04 | Jul 27, 11 | Potential for damage to pipeline facilities caused by severe flooding. |

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

| **Comments:** |
| --- |
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