

# Inspection Output (IOR)

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## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	8420- Cardinal FG Standard	Operator(s)	CARDINAL FG (32176)	Plan Submitted	02/15/2022
		Lead	Darren Tinnerstet	Plan Approval	02/16/2022
Status	PLANNED	Observer(s)	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrrough, David D Lykken, Derek Norwood, Scott Anderson		by Sean Mayo
Start Year	2022			All Activity Start	05/25/2022
System Type	GT	Supervisor	Scott Rukke	All Activity End	06/22/2022
Protocol Set ID	WA.GT.2021.02	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

The Cardinal Pipeline is comprised of 6 inch diameter (NPS-6), API 5L, X-52 ERW steel pipe with a nominal wall thickness of 0.280 inches. The Cardinal Pipeline is entirely located in Lewis County Washington beginning at the Williams Northwest Pipeline Interconnection at the Chehalis Compressor Station and ending at the Cardinal Glass Facility property line. The overall length of the Pipeline is approximately 3.25 miles. Per PHMSA guidelines the WUTC jurisdictional boundary is considered the Cardinal property line. The Cardinal Pipeline contains no mainline valves beyond those at the Williams interconnection and the Cardinal delivery point.

### Inspection Scope and Summary

This is standard inspection of Cardinal FG.

### Facilities visited and Total AFOD

Records reviewed at Cardinal's office in Winlock. Field inspections conducted onsite as well.

AFOD = 1

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

Two violations discovered during inspection.

(1) violation of 192.615 for failing to conduct proper trainings with local officials and document.

(1) violation of 192.605 for failing to follow procedures in regards to remediation of atmospheric corrosion inspections.

### Primary Operator contacts and/or participants

Stephen Hernandez - EverLine (Compliance Consultant)

**Operator executive contact and mailing address for any official correspondence**

Stephen Smith  
 Plant Manager - Cardinal FG  
 545 Avery Road West  
 Winlock, WA 98596

**Scope (Assets)**

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88991 (1519)	Cardinal FG	unit	88991	Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Copper Pipe Aluminum/Amphoteric Compressor Stations Cast or Ductile Iron Plastic Pipe AMAOP CDA Abandoned	152	152	152	100.0%

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

**Plans**

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	88991 (1519)	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail --

**Plan Implementations**

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Cardinal Standard	--	05/25/2022	06/22/2022	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	88991 (1519)	all types	152	152	152	100.0%

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

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Cardinal Standard	COMPLETED	06/27/2022	Cardinal Standard	--

## Results (all values, 152 results)

169 (instead of 152) results are listed due to re-presentation of questions in more than one sub-group.

### AR.PTI: Integrity Assessment Via Pressure Test

1. Question Result, ID, References **NA, AR.PTI.PRESSTESTREQUAL.R, 192.947(g) (192.915(a), 192.915(b))**

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*

Assets Covered **88991 (1519)**

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

Not in a HCA, currently uses method 1
2. Question Result, ID, References **NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))**

Question Text *Do the test records validate the pressure test?*

Assets Covered **88991 (1519)**

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

No HCA

MAOP 1000 psig.
3. Question Result, ID, References **NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))**

Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*

Assets Covered **88991 (1519)**

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

### AR.RMP: Repair Methods and Practices

4. Question Result, ID, References **Sat, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered **88991 (1519)**

Result Notes **Observed proper signs and fire extinguishers.**
5. Question Result, ID, References **NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))**

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered **88991 (1519)**

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

OM Section 10 - Integrity repairs.

## DC.CO: Construction

6. Question Result, ID, References **NA, DC.CO.CASING.O, 192.323 (192.467(a), 192.467(b))**  
Question Text *Do field observations confirm railroad or highway casings are being installed as designed and specified, and in accordance with 192.323?*  
Assets Covered **88991 (1519)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
7. Question Result, ID, References **NA, DC.CO.REPAIR.R, 192.303 (192.309)**  
Question Text *Do records demonstrate that repairs to steel pipe are being made in accordance with §192.309?*  
Assets Covered **88991 (1519)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**  
  
**No repairs made since pipeline installation in 2006.**
8. Question Result, ID, References **NA, DC.DPC.CCROTLOWER.R, 192.143(b) (192.461(c))** (also presented in: DC.DPC)  
Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*  
Assets Covered **88991 (1519)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## DC.WELDINS: Construction Weld Inspection

9. Question Result, ID, References **Sat, DC.WELDINS.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)**  
Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*  
Assets Covered **88991 (1519)**  
Result Notes **Reviewed NDT reports from Acuren from April and May 2006.**  
  
**Reviewed OQ records for NDT techs.**
10. Question Result, ID, References **Sat, DC.WELDINS.WELDNDR.R, 192.243**  
Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*  
Assets Covered **88991 (1519)**
11. Question Result, ID, References **NA, DC.WELDINS.WELDREPAIR.R, 192.245 (192.303)**  
Question Text *Do records indicate that unacceptable welds are removed and/or repaired in accordance with 192.245?*  
Assets Covered **88991 (1519)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## DC.WELDPROCEDURE: Construction Welding Procedures

12. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELD.R, 192.225**  
Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*  
Assets Covered **88991 (1519)**  
Result Notes **Reviewed Welding procedure Appendix A**
13. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELDERQUAL.R, 192.227 (192.225, 192.229)**

Question Text *Do the records demonstrate that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in 192.229?*

Assets Covered 88991 (1519)

Result Notes Reviewed Welding qualification records for NW Metal Fab & Pipe welders:

Bill Davis

William Morgan

Cody Davis

John Christiansen

14. Question Result, ID, References NA, DC.WELDPROCEDURE.WELDERQUAL.O, 192.227 (192.225, 192.229)

Question Text *Do field observations confirm that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in 192.229?*

Assets Covered 88991 (1519)

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

## DC.DPCOPP: Design of Pipe - Overpressure Protection

15. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.R, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?*

Assets Covered 88991 (1519)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No transmission line valves or pressure limiting devices required for system protection. Williams input pressure will not exceed MAOP of 890 PSIG. Cardinal pipeline MAOP is 1000 PSIG.

16. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.O, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Are required pressure relieving or pressure limiting devices being installed, and do they meet the requirements of 192.199 and 192.201?*

Assets Covered 88991 (1519)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No transmission line valves or pressure limiting devices required for system protection. Williams input pressure will not exceed MAOP of 890 PSIG. Cardinal pipeline MAOP is 1000 PSIG.

17. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.R, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do records indicate that pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88991 (1519)

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

18. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.O, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do field observations confirm pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88991 (1519)

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

19. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMITCAP.R, 192.201(a) (192.201(b), 192.201(c))

Question Text *Do records indicate that pressure relief or pressure limiting stations being installed comply with 192.201?*

Assets Covered 88991 (1519)

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

20. Question Result, ID, References **NA, DC.DPCOPP.PRESSLIMITCAP.O, 192.201(a) (192.201(b), 192.201(c))**  
 Question Text *Do field observations verify pressure relief or pressure limiting stations comply with the requirements of 192.201?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
21. Question Result, ID, References **NA, DC.DPCOPP.MULTISTAGE.R,**  
 Question Text *Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## DC.DPC: Design of Pipe Components

22. Question Result, ID, References **Sat, DC.DPC.ILIPASS.R, 192.150 (192.150(a), 192.150(c))**  
 Question Text *Do records indicate that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*  
 Assets Covered **88991 (1519)**
23. Question Result, ID, References **NA, DC.DPC.VALVESPACE.R, 192.179(a) (192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d))**  
 Question Text *Do records indicate that transmission line valve spacing is in accordance with 192.179(a)?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
- Total length of pipeline is 3.25 miles. Class 1 location.**
24. Question Result, ID, References **NA, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))**  
 Question Text *Are transmission line valves being installed as required by 192.179?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
25. Question Result, ID, References **NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))**  
 Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
- Pipeline constructed and placed into service in 2006. Pipeline only transports dry natural gas.**
26. Question Result, ID, References **Sat, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))**  
 Question Text *Does the transmission project's design and construction comply with 192.476?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Pipeline only transports commercial grade natural gas. Low moisture content.**
- Pipeline installed in 2006.**
27. Question Result, ID, References **NA, DC.DPC.CCPROTCOATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.CO)**  
 Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

28. Question Result, ID, References **NA, DC.DPC.CCELECTRICALISOL.R, 192.467(c) (192.143(b))**  
 Question Text *Do operator's records indicate that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
29. Question Result, ID, References **NA, DC.DPC.CCELECTRICALISOL.O, 192.467(c) (192.143(b))**  
 Question Text *Do field observations confirm that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## DC.MO: Maintenance and Operations

30. Question Result, ID, References **NA, DC.MO.ICEXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.475(c))**  
 Question Text *Do records indicate examination of removed pipe for evidence of internal corrosion?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
31. Question Result, ID, References **NA, DC.MO.ICEXAMINE.O, 192.475(a) (192.475(b), 192.475(c))**  
 Question Text *Is examination of removed pipe conducted to determine any evidence of internal corrosion?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
32. Question Result, ID, References **NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5)**  
 Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such activity/condition was observed during the inspection.**
33. Question Result, ID, References **NA, DC.MO.RECORDUPDATE.R,**  
 Question Text *Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## DC.PT: Pressure Testing

34. Question Result, ID, References **Sat, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: **DC.PT.LOWPRESS**)  
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Reviewed hydrostatic test report dated 6/16/2006.**  
  
**Tested to 1820 psig. for 8.5 hours.**
35. Question Result, ID, References **NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: **DC.PT.LOWPRESS**)  
 Question Text *Is pressure testing conducted in accordance with 192.503?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
36. Question Result, ID, References **NA, DC.PT.PRESSTESTHIGHSTRESS.R, 192.505(a) (192.143(a), 192.517(a), 192.505(b), 192.505(c), 192.505(d), 192.143(b), 192.143(c))**

Question Text *Do records indicate that the sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS were strength tested in accordance with the requirements of 192.505?*

Assets Covered 88991 (1519)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Not required. 22.8% is max SMYS for pipeline.

37. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.O, 192.505(a) (192.143(a), 192.505(b), 192.505(c), 192.505(d),  
References 192.143(b), 192.143(c))

Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS are strength tested in accordance with the requirements of 192.505?*

Assets Covered 88991 (1519)

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

38. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b)) (also presented in:  
References DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*

Assets Covered 88991 (1519)

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

39. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in:  
References DC.PTLOWPRESS)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*

Assets Covered 88991 (1519)

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

40. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in:  
References DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88991 (1519)

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

41. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in:  
References DC.PTLOWPRESS)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88991 (1519)

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

42. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PTLOWPRESS)  
References

Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*

Assets Covered 88991 (1519)

Result Notes Only pressure test was conducted at time of commissioning 6/16/2006.

43. Question Result, ID, Sat, DC.PT.EQUIPMENTCALIBRATION.R,  
References

Question Text *Do records indicate that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer's recommendations?*

Assets Covered 88991 (1519)

Result Notes Reviewed calibration records (Measure Tech)

## DC.PTLOWPRESS: Pressure Testing - Low Pressure

44. Question Result, ID, Sat, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented  
References in: DC.PT)

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*

Assets Covered 88991 (1519)



Result Notes Reviewed hydrostatic test report dated 6/16/2006.

Tested to 1820 psig. for 8.5 hours.

45. Question Result, ID, NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented References in: DC.PT)  
Question Text *Is pressure testing conducted in accordance with 192.503?*  
Assets Covered 88991 (1519)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
46. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.507 (192.505, 192.515, 192.517, ANSI/GPTC Z380.1-2018 Appendix G-192-9)  
Question Text *Do records indicate that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig were tested in accordance with the requirements of 192.507?*  
Assets Covered 88991 (1519)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
47. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.O, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018 Appendix G-192-9)  
Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig are tested in accordance with the requirements of 192.507?*  
Assets Covered 88991 (1519)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
48. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.509 (192.143, 192.517)  
Question Text *Do records indicate that the sections of a pipeline operated below 100 psig were leak tested in accordance with the section requirements of 192.509 (except for service lines and plastic pipelines)?*  
Assets Covered 88991 (1519)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
49. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTEST100PSIG.O, 192.509 (192.143)  
Question Text *Do field observations confirm that sections of a pipeline operated below 100 psig are leak tested in accordance with the requirements of 192.509 (except for service lines and plastic pipelines)?*  
Assets Covered 88991 (1519)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
50. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT)  
Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*  
Assets Covered 88991 (1519)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
51. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT)  
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*  
Assets Covered 88991 (1519)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
52. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT)  
Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*  
Assets Covered 88991 (1519)  
Result Notes No such activity/condition was observed during the inspection.
53. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT)  
References

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88991 (1519)

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

54. Question Result, ID, References Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT)

Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*

Assets Covered 88991 (1519)

Result Notes Only pressure test was conducted at time of commissioning 6/16/2006.

## DC.TQ: Training and Qualification

55. Question Result, ID, References Sat, DC.TQ.ABNORMAL.R, 192.807(a) (192.803)

Question Text *Do records show evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 88991 (1519)

Result Notes Reviewed OQ records for Eric Larsen (NW Metal Fab)

AOC OQ expired 9/2021 (only general AOC OQ)

All other OQ tasks have a built in AOC section of training and testing specific to each task. Contractor was current on all specific OQ Tasks.

56. Question Result, ID, References Sat, DC.TQ.RECORDS.R, 192.807(a) (Operators OQ program manual)

Question Text *Are qualification records maintained for operator personnel?*

Assets Covered 88991 (1519)

Result Notes Reviewed Eric Larsen (NW Metal Fab) OQ's

## EP.ERG: Emergency Response

57. Question Result, ID, References Sat, EP.ERG.REVIEW.R, 192.605(a)

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

Assets Covered 88991 (1519)

Result Notes Reviewed 6/15/2021 Form 2 - OM Manual Review

58. Question Result, ID, References Sat, EP.ERG.LOCATION.O, 192.615(b)(1)

Question Text *Are supervisors provided the applicable portions of the emergency plan and procedures?*

Assets Covered 88991 (1519)

Result Notes Plant supervisor has hard copy of EPM in their office.

59. Question Result, ID, References NA, EP.ERG.POSTEVTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered 88991 (1519)

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

Emergency Procedures Manual Section 5.1.4(c)

60. Question Result, ID, References Unsat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 88991 (1519)

## Result Issue Summary

Operator could not provide documentation of meetings or trainings conducted with appropriate fire, police, and other public officials. It was determined that these meetings have not been conducted in the past due to a misunderstanding by the operator. The operator was distributing pipeline specific information to local officials by way of a handbook and believed this was satisfying the requirements of this rule. Staff discussed the need to schedule meetings or training scenarios with local officials in order to be in compliance.

After the completion of this inspection, staff was advised that on May 31, 2022, operator initiated and hosted a tabletop training scenario with local officials via video conference. Cardinal's Compliance Consultant (EverLine) provided staff with a detailed outline of what was covered during the training, as well as a list of the officials who attended (see attachment). This type of training is what is required going forward to maintain compliance.

Standard Issues B1 (Moderate or small impact/widespread occurrence) : 192.615(c)(4) : No record/documentation.

Result Notes Initial review indicated this was an area of concern and possible violation. Trainings had not been conducted with mutual aid agencies. Operator was under the impression that they were complying with this requirement by providing their pipeline specific information to local officials and emergency responders. Discussion was had regarding the requirement to conduct trainings to identify mutual assistance parameters and the resources each agency has during an emergency.

Operator immediately set up a virtual table top training exercise that was completed on 5/31/2022. Attached is the outline of the scenario that was presented and the notes from the debrief.

## MO.GC: Conversion to Service

61. Question Result, ID, References NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b), 192.14(c))

Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*

Assets Covered 88991 (1519)

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

## MO.GOABNORMAL: Gas Pipeline Abnormal Operations

62. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))

Question Text *Did personnel respond to indications of abnormal operations as required by the process?*

Assets Covered 88991 (1519)

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

63. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered 88991 (1519)

Result Notes Reviewed last compliance report 4/14/2022 conducted by Stephen Hernandez.

## MO.GOCLASS: Gas Pipeline Class Location

64. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *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?*

Assets Covered 88991 (1519)

65. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 88991 (1519)

Result Notes Continuing surveillance is included in pipeline patrol reports.

Reviewed Form 3a for 2019-2021 period. No issues.

Everline is now conducting arial drone fly overs for this specific requirement.

66. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also References presented in: MO.GO)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 88991 (1519)

Result Notes Observed compliance consultant perform drone flyover of right a way.

## MO.GOMAOP: Gas Pipeline MAOP

67. Question Result, ID, Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b), 192.619(f), 192.517) References

Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*

Assets Covered 88991 (1519)

Result Notes MAOP 1000 psig.

Reviewed Appendix D - Determination of MAOP (conducted by previous compliance consultant Bob Cosentino 8/3/2006)

## MO.GM: Gas Pipeline Maintenance

68. Question Result, ID, Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also References presented in: MO.GMOPP)

Question Text *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?*

Assets Covered 88991 (1519)

Result Notes Records are maintained in the following locations:

Office of Pipeline Manager (Chuck Miller / Mechanical Engineer)

SafePipe (Everline's proprietary software)

Everline's private SharePoint site.

69. Question Result, ID, NA, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c)) References

Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*

Assets Covered 88991 (1519)

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

70. Question Result, ID, Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b)) References

Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*

Assets Covered 88991 (1519)

Result Notes Reviewed Form F-4 - Valves Inspection

No issues with any valves.

71. Question Result, ID, Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b)) References

Question Text *Are field inspection and partial operation of transmission line valves adequate?*

Assets Covered 88991 (1519)

Result Notes Observed partial valve operation at Williams tap.

## MO.GOODOR: Gas Pipeline Odorization

72. Question Result, ID, Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d),  
References 192.625(e), 192.625(f))

Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*

Assets Covered 88991 (1519)

Result Notes Reviewed odorization records for 2019-2021.

No readings above 1%.

73. Question Result, ID, NA, MO.GOODOR.ODORIZE.O, 192.625(f)  
References

Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*

Assets Covered 88991 (1519)

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

## MO.GO: Gas Pipeline Operations

74. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also  
References presented in: MO.GOCLASS)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 88991 (1519)

Result Notes Continuing surveillance is included in pipeline patrol reports.

Reviewed Form 3a for 2019-2021 period. No issues.

Everline is now conducting arial drone fly overs for this specific requirement.

75. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also  
References presented in: MO.GOCLASS)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 88991 (1519)

Result Notes Observed compliance consultant perform drone flyover of right a way.

76. Question Result, ID, Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)  
References

Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*

Assets Covered 88991 (1519)

Result Notes Form 2. Last reviews done:

6/15/2021.

6/19/2020

9/2/2019.

77. Question Result, ID, Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))  
References

Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered 88991 (1519)

Result Notes Reviewed records for periodic review (Form 24)

Corrosion 4 - 9/10/2019

Leak Survey 7.5 - 11/20/2020

Emergency Response 19 - 10/6/2020

78. Question Result, ID, References Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))

Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*

Assets Covered 88991 (1519)

Result Notes Records are located onsite in Operations Manager's office.

Also have electronic access through SafePipe - Field personnel as well.

79. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)

Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered 88991 (1519)

Result Notes Contractor NW Metal Fab had electronic access to construction records and operating.

80. Question Result, ID, References Sat, MO.GO.OMLOCATION.O, 192.605(a)

Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*

Assets Covered 88991 (1519)

81. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))

Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*

Assets Covered 88991 (1519)

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

## MO.GMOPP: Gas Pipeline Overpressure Protection

82. Question Result, ID, References Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*

Assets Covered 88991 (1519)

Result Notes Form 4b

4/6/2022 - rebuilt no lockup

8/3/2021

8/6/2020

8/13/2019

83. Question Result, ID, References Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)

Question Text *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?*

Assets Covered 88991 (1519)

Result Notes Records are maintained in the following locations:

Office of Pipeline Manager (Chuck Miller / Mechanical Engineer)

SafePipe (Everline's proprietary software)

Everline's private SharePoint site.

84. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*

Assets Covered 88991 (1519)

Result Notes Form 4b

4/6/2022 - rebuilt no lockup

8/3/2021

8/6/2020

8/13/2019

85. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)

Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*

Assets Covered 88991 (1519)

Result Notes See Form R for field evaluation of pressure limiting station.

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

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

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

Assets Covered 88991 (1519)

Result Notes Form 3a

Reviewed following report dates:

12/2/2021

9/7/2021

6/8/2021

3/2/2021

6/4/2020

12/1/2020

7/9/2020

3/5/2020

12/5/2019

3/1/2019

87. Question Result, ID, [Sat, MO.RW.ROWMARKER.O](#), 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References [PD.RW](#))  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered [88991 \(1519\)](#)  
Result Notes [Observed adequate marker placement during pre-field inspection.](#)
88. Question Result, ID, [Sat, MO.RW.ROWCONDITION.O](#), 192.705(a) (192.705(c)) (also presented in: [PD.RW](#))  
References  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered [88991 \(1519\)](#)  
Result Notes [Observed ROW conditions during pre-field inspection. No issues identified.](#)
89. Question Result, ID, [Sat, MO.RW.MARKERSURVEY.R](#),  
References  
Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*  
Assets Covered [88991 \(1519\)](#)  
Result Notes [Form F-34 Pipeline Marker Inspection for 2019-2020](#)
- [Switched to Form 3B in 2021:](#)
- [12/2/2021](#)
- [9/7/2021](#)
- [6/8/2021](#)
- [3/2/2021](#)
90. Question Result, ID, [Sat, MO.RW.LEAKAGE.R](#), 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))  
References  
Question Text *Do records indicate leakage surveys conducted as required?*  
Assets Covered [88991 \(1519\)](#)  
Result Notes [Form 3b - Leakage Survey](#)
- [12/2/2021](#)
- [6/8/2021](#)
- [3/2/2021](#)
- [9/3/2020](#)
- [6/4/2020](#)
- [3/5/2020](#)
- [12/5/2019](#)
- [3/1/2019](#)
91. Question Result, ID, [NA, MO.RW.CASINGLEAKSURVEY.R](#),  
References  
Question Text *Do records indicate shorted casings were leak surveyed as required?*  
Assets Covered [88991 \(1519\)](#)



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

92. Question Result, ID, References NA, MO.RW.SPECIALLEAKSURVEY.R,

Question Text Do records indicate that special leak surveys have been conducted as required by WAC 480-93-188?

Assets Covered 88991 (1519)

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

93. Question Result, ID, References NA, MO.RW.LEAKGRADE.R,

Question Text Do records indicate that the operator has graded leaks and determined the extent of each leak?

Assets Covered 88991 (1519)

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

94. Question Result, ID, References NA, MO.RW.LEAKFOLLOWUP.R,

Question Text Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?

Assets Covered 88991 (1519)

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

95. Question Result, ID, References NA, MO.RW.DOWNGRADELEAKREPAIR.R,

Question Text Do records indicate that leaks that have been downgraded are repaired within twenty-one months?

Assets Covered 88991 (1519)

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

96. Question Result, ID, References NA, MO.RW.LEAKREPAIRTIME.R,

Question Text Do records indicate that leaks were repaired and re-evaluated within the timeframes specified in WAC 480-93-18601?

Assets Covered 88991 (1519)

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

97. Question Result, ID, References NA, MO.RW.LEAKRECORDS.R,

Question Text Have gas leak records been prepared and maintained as required?

Assets Covered 88991 (1519)

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

98. Question Result, ID, References Sat, MO.RW.LEAKCALIBRATE.R,

Question Text Do records indicate that gas detection equipment has been maintained and calibrated in accordance with the manufacturer's recommendations?

Assets Covered 88991 (1519)

Result Notes Calibration dates are included on Form 3b.

## PD.DP: Damage Prevention

99. Question Result, ID, References Sat, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text Observe operator process a "One Call" ticket.

Assets Covered 88991 (1519)

Result Notes Contractor NW Metal Fab only gets 2-3 locates per year. Most recent one was completed two weeks prior to inspection. Contractor walked me through his process and showed me where locate marks were applied.

100. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text Does the damage prevention program meet minimum requirements specified in 192.614(c)?

Assets Covered 88991 (1519)

101. Question Result, ID, References **Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))**  
 Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Reviewed Form 3b records. These contain information relevant to damage prevention program.**
102. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**  
 Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
103. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**  
 Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## PD.PA: Public Awareness

104. Question Result, ID, References **Unsat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)** (also presented in: EP.ERG)  
 Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*  
 Assets Covered **88991 (1519)**  
 Result Issue Summary **Operator could not provide documentation of meetings or trainings conducted with appropriate fire, police, and other public officials. It was determined that these meetings have not been conducted in the past due to a misunderstanding by the operator. The operator was distributing pipeline specific information to local officials by way of a handbook and believed this was satisfying the requirements of this rule. Staff discussed the need to schedule meetings or training scenarios with local officials in order to be in compliance.**
- After the completion of this inspection, staff was advised that on May 31, 2022, operator initiated and hosted a tabletop training scenario with local officials via video conference. Cardinal's Compliance Consultant (EverLine) provided staff with a detailed outline of what was covered during the training, as well as a list of the officials who attended (see attachment). This type of training is what is required going forward to maintain compliance.**
- Standard Issues **B1 (Moderate or small impact/widespread occurrence) : 192.615(c)(4) : No record/documentation.**  
 Result Notes **Initial review indicated this was an area of concern and possible violation. Trainings had not been conducted with mutual aid agencies. Operator was under the impression that they were complying with this requirement by providing their pipeline specific information to local officials and emergency responders. Discussion was had regarding the requirement to conduct trainings to identify mutual assistance parameters and the resources each agency has during an emergency.**
- Operator immediately set up a virtual table top training exercise that was completed on 5/31/2022. Attached is the outline of the scenario that was presented and the notes from the debrief.**
105. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)**  
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Available in Spanish upon request.**

## PD.RW: ROW Markers, Patrols, Monitoring

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

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

Assets Covered 88991 (1519)

Result Notes Form 3a

Reviewed following report dates:

12/2/2021

9/7/2021

6/8/2021

3/2/2021

6/4/2020

12/1/2020

7/9/2020

3/5/2020

12/5/2019

3/1/2019

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

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

Assets Covered 88991 (1519)

Result Notes Observed adequate marker placement during pre-field inspection.

108. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW) References

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered 88991 (1519)

Result Notes Observed ROW conditions during pre-field inspection. No issues identified.

## PD.SP: Special Permits

109. Question Result, ID, NA, PD.SP.REPAIR.R, 190.341(d)(2) References

Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*

Assets Covered 88991 (1519)

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

## RPT.NR: Notices and Reporting

110. Question Result, ID, Sat, RPT.NR.CONTACTUPDATE.R, References

Question Text *Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities?*

Assets Covered 88991 (1519)

Result Notes reviewed database for updated contact information. It is current.

111. Question Result, ID, References **NA, RPT.NR.CONSTRUCTIONREPORT.R,**  
 Question Text *Do records indicate the operator has filed a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
112. Question Result, ID, References **NA, RPT.NR.PRESSURETESTNOTIFY.R,**  
 Question Text *Do records indicate that the operator notified the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
113. Question Result, ID, References **NA, RPT.NR.PROXIMITYREQUEST.R,**  
 Question Text *Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## RPT.RR: Regulatory Reporting (Traditional)

114. Question Result, ID, References **Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)**  
 Question Text *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*  
 Assets Covered **88991 (1519)**  
 Result Notes **2021 submitted on 3/15/2022**  
  
**2020 submitted on 2/26/2021**  
  
**2019 submitted on 3/12/2020**
115. Question Result, ID, References **Sat, RPT.RR.CONSTRUCTIONDEFECTS.R,**  
 Question Text *Do records indicate that the operator has submitted timely and complete reports of construction defects and material failures that resulted in leaks?*  
 Assets Covered **88991 (1519)**  
 Result Notes **last report submitted in 2018. No defects or failures have been reported since. Discussed with operator and they will start submitting reports again for 2022 and beyond.**
116. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))**  
 Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
117. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2))**  
 Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
118. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)**  
 Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe using the most recent Form?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

119. Question Result, ID, References **NA, RPT.RR.FAILUREANALYSIS.R,**  
 Question Text *Do records indicate that the operator submits failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
120. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c))**  
 Question Text *Do records indicate safety-related condition reports were filed as required?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
121. Question Result, ID, References **Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))**  
 Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*  
 Assets Covered **88991 (1519)**  
 Result Notes **2021 submitted 3/15/2022**  
**2020 submitted 2/1/2021**  
**2019 submitted 3/10/2020**
122. Question Result, ID, References **Sat, RPT.RR.PIPELINEMAPPING.R,**  
 Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No updates or changes since initial submission. Maps are up to date and accurate in UTC database.**
123. Question Result, ID, References **Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))**  
 Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*  
 Assets Covered **88991 (1519)**
124. Question Result, ID, References **NA, RPT.RR.DIRTREPORTS.R,**  
 Question Text *Do records indicate that the operator has submitted reports of damage to the commission using the damage information reporting tool (DIRT) within 45 days?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## TD.ATM: Atmospheric Corrosion

125. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c))**  
 Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Reviewed Form F-3. 4/2/2019**  
**new form will be Form 8.**
126. Question Result, ID, References **Unsat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))**  
 Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*  
 Assets Covered **88991 (1519)**

Result Issue Summary Operator failed to follow their procedure regarding remediation of atmospheric corrosion. Operator's contractor performed an atmospheric corrosion inspection on April 2, 2019, and documented that the coating at the William's delivery station needed cleaning and touch-up of slight superficial corrosion. According to Cardinal's procedures in place at the time of the inspection, light corrosion was to be repaired within 90-days or less. This procedure was in the Operations and Maintenance Manual Revision 4B, Section 4.6(g), issued on Sept. 28, 2015, by Cosentino Consulting, Inc. According to records, this coating cleaning and touch-up of slight superficial corrosion was not completed.

Standard Issues B2 (Moderate or small impact/limited occurrence) : 192.605(a) : Documentation does not demonstrate adequate implementation of operator's process.

Result Notes Reviewed Form F-3. 4/2/2019

new form will be Form 8.

127. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

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

Assets Covered 88991 (1519)

Result Notes OM Manual 10.11 (5) - 12-15 months to remediate minor corrosion

OM Manual 10.12 - remedial action (not very specific, see original procedure P-4)

Original OM section 4.6.1(g) - 90 days for remediation of light atmospheric corrosion.

## TD.CPMONITOR: External Corrosion - CP Monitoring

128. Question Result, ID, References NA, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))

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

Assets Covered 88991 (1519)

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

129. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a))

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 88991 (1519)

Result Notes See Form R for CP readings.

130. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a))

Question Text *Do records document that the CP monitoring criteria used was acceptable?*

Assets Covered 88991 (1519)

Result Notes CP records were adequate and used the appropriate criteria.

131. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))

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

Assets Covered 88991 (1519)

Result Notes Reviewed Form 6

4/5/2022

4/1/2021

4/2/2020

4/2/2019

132. Question Result, ID, References **NA, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)**  
 Question Text *Are impressed current sources properly maintained and are they functioning properly?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
133. Question Result, ID, References **NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))**  
 Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
134. Question Result, ID, References **NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)**  
 Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
135. Question Result, ID, References **NA, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))**  
 Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
136. Question Result, ID, References **Sat, TD.CPMONITOR.TESTSTATION.R, 192.469**  
 Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Reviewed Test Point location document.**
137. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))**  
 Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*  
 Assets Covered **88991 (1519)**
138. Question Result, ID, References **NA, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))**  
 Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
139. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CP, TD.CPEXPOSED)**  
 Question Text *Do records indicate the location of all items listed in 192.491(a)?*  
 Assets Covered **88991 (1519)**

## **TD.CP: External Corrosion - Cathodic Protection**

140. Question Result, ID, References **Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))**  
 Question Text *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?*  
 Assets Covered **88991 (1519)**
141. Question Result, ID, References **NA, TD.CP.PRE1971.O, 192.457(b)**

Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?*

Assets Covered 88991 (1519)

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

142. Question Result, ID, References NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))

Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*

Assets Covered 88991 (1519)

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

143. Question Result, ID, References NA, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88991 (1519)

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

144. Question Result, ID, References NA, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88991 (1519)

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

145. Question Result, ID, References NA, TD.CP.CASINGINSPECT.R,

Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*

Assets Covered 88991 (1519)

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

146. Question Result, ID, References NA, TD.CP.CASINGINSPECT.O,

Question Text *Are casings electrically isolated from the pipeline?*

Assets Covered 88991 (1519)

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

147. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered 88991 (1519)

## TD.COAT: External Corrosion - Coatings

148. Question Result, ID, References Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*

Assets Covered 88991 (1519)

Result Notes Reviewed NW Corrosion Engineering report dated 10/08/2010. Coating is FBE.

Original OM Procedure P-25 for approved coating types. and section 4.3

## TD.CPEXPOSED: External Corrosion - Exposed Pipe



149. Question Result, ID, References **NA, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)**  
 Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
150. Question Result, ID, References **NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459**  
 Question Text *Is exposed buried piping examined for corrosion and deteriorated coating?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
151. Question Result, ID, References **NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c))**  
 Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
152. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CPMONITOR, TD.CP)  
 Question Text *Do records indicate the location of all items listed in 192.491(a)?*  
 Assets Covered **88991 (1519)**

## TD.ICP: Internal Corrosion - Preventive Measures

153. Question Result, ID, References **NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))**  
 Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
154. Question Result, ID, References **NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))**  
 Question Text *Is removed pipe examined for evidence of internal corrosion?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
155. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))**  
 Question Text *Do records document adequate evaluation of internally corroded pipe?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
156. Question Result, ID, References **NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))**  
 Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## TQ.PROT9: OQ Protocol 9

157. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**  
 Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*  
 Assets Covered **88991 (1519)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

158. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*  
 Assets Covered **88991 (1519)**
159. Question Result, ID, References **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*  
 Assets Covered **88991 (1519)**  
 Result Notes **See Form R for details of OQ records checked.**
160. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*  
 Assets Covered **88991 (1519)**  
 Result Notes **Discussed applicable AOC's with contractor Eric Larson.**
161. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**  
 Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*  
 Assets Covered **88991 (1519)**

## TQ.OQ: Operator Qualification

162. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))**  
 Question Text *Are adequate records containing the required elements maintained for contractor personnel?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Reviewed OQ records for operating personnel.**
163. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 192.807**  
 Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Reviewed OQ records (Energy World Net)**
164. Question Result, ID, References **Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))**  
 Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*  
 Assets Covered **88991 (1519)**  
 Result Notes **Reviewed**
165. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)**  
 Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*  
 Assets Covered **88991 (1519)**  
 Result Notes **OQ for AOC (specifically) for Eric Larson expired 9/28/2021. The specific OQ's expired are:**
- Ignition sources**
  - Properties of Natural Gas**
  - Each task has their own set of AOC's built into the qualification training.**

## TQ.QU: Qualification of Personnel - Specific Requirements

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

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 88991 (1519)

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

167. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 88991 (1519)

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

168. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered 88991 (1519)

## TQ.TR: Training of Personnel

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

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

Assets Covered 88991 (1519)

Result Notes Reviewed employee emergency responder training for 2019-2021 period.

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