

Inspection Output (IOR)

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Inspection Information

Inspection Name	8076 BP Ferndale Pipeline System Standard Comprehe	Operator(s)	FERNDALE PIPELINE SYSTEM (570)	Plan Submitted	06/22/2021
Status	PLANNED	Lead	Dennis Ritter	Plan Approval	06/22/2021 by Sean Mayo
Start Year	2021	Team Members	Scott Rukke, David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity Start	06/14/2021
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	06/23/2021
Protocol Set ID	GT.2021.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

The 2021 Ferndale Pipeline System Inspection will use the IA GT Directives: Baseline Records; Small System Key Risks; Baseline Pipeline Field Inspection for compliance assessment.

The records inspection was conducted virtually using MS Teams. The records for answering the IA questions were presented online and all records asked for were produced during the inspection. There were no findings from the records review portion of the inspection. The field inspection was conducted in person and facilities visited as noted in the inspection-field.

Facilities visited and Total AFOD

June 14, 2021 records review via Teams 1 AFOD

June 15, 2021 records review 1/2 d; travel day to Bellingham WA 1/2 d-1 AFOD

June 16, 2021 Field Inspection: Ferndale to Sumas: 1AFOD

June 16, 2021 3:00 pm, Exit Interview: Jim Fraley and Scott Fitzgerald, BP DOT Compliance Advisors

Pipeline facilities were visited on June 16, 2021. The inspection began at the idled Alcoa Intalco Works Aluminum smelter in Ferndale WA. The meter station at Intalco was inspected for atmospheric corrosion. Cathodic protection readings were also taken. The 8" Intalco line was traced back to the BP Cherry Pt refinery meter station. No issues with PSP reads were noted in the records review. Therefore, PSP reads were taken at approximately 2.5 mile intervals along the line. Atmospheric corrosion was checked at Intalco and Cherry PT meter stations, all MLVs and Sumas meter station. There are no major water crossing on this line. 1 AFOD

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no findings from the records or field inspection

Primary Operator contacts and/or participants

Jim Bruen DOT Team Leader-Programs

Jim Fraley DOT Compliance Advisor

Operator executive contact and mailing address for any official correspondence

John D'Andrea

Head of North American Operations and HSSE

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Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88968 (91)	88968	unit	88968	Storage Fields Bottle/Pipe - Holders Vault Service Line Compressor Stations Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP	94	94	94	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.	88968 (91)	Baseline Records (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail
2.	88968 (91)	Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail
3.	88968 (91)	Small System Key Risks	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	R, O	Detail

Plan Implementations

Activity #	Name	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Records	--	06/14/2021 06/17/2021	n/a	all planned questions	all assets	R	70	70	70	100.0%
2.	Field	--	06/21/2021 06/23/2021	n/a	all planned questions	all assets	O	24	24	24	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	Records	COMPLETED	06/17/2021	Records	88968 (91)

Results (Unsat,Concern values, 0 results)

This inspection has no matching Results.

Report Parameters: Results: Unsat,Concern

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

Inspection Results (IRR)

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• 88968 (91) (103)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row #	Asset	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text
1.	(and 1 other asset)	NA	AR.PTI	4.	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))	Do the test records validate the pressure test?
2.	(and 1 other asset)	NA	AR.RMP	5.	AR.RMP.IGNITION.O	192.751(a) (192.751(b), 192.751(c))	Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.
3.	(and 1 other asset)	NA	AR.RMP	21.	AR.RMP.FIELDREPAIRLEAK.R	192.717(a) (192.717(b))	From the review of records, did the operator properly repair leaks on transmission lines?
4.	(and 1 other asset)	NA	AR.RMP	25.	AR.RMP.WELDTEST.O	192.719(a) (192.719(b))	Does the operator properly test replacement pipe and repairs made by welding on transmission lines?
5.	(and 1 other asset)	Sat	CR.CRMRR	7.	CR.CRMRR.PRESSLIMITS.O	192.631(b)(2) (192.619(a), 192.631(e)(1))	Are controllers aware of the current MAOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MAOP?
6.	(and 1 other asset)	Sat	CR.SCADA	11.	CR.SCADA.POINTVERIFY.R	192.631(c)(2)	Have required point-to-point verifications been performed?
7.	(and 1 other asset)	NA	DC.CO	51.	DC.CO.CLEAR.R	192.325(a) (192.325(b), 192.325(c), 192.325(d))	Do records indicate that transmission lines or mains are installed with clearances specified in 192.325, and (if plastic) installed as to prevent heat damage to the pipe?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row	Asset	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
Number	Number	Text		Text			
8.	(and 1 other asset)	Sat	DC.CO	54.	DC.CO.COVERONSHORE.R	192.327(a) (192.327(b), 192.327(c), 192.327(d), 192.327(e))	Is onshore piping minimum cover provided as specified in 192.327?
9.	(and 1 other asset)	NA	DC.WELDINSP	2.	DC.WELDINSP.WELDVISUALQUAL.R	192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)	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?
10.	(and 1 other asset)	NA	DC.WELDINSP	5.	DC.WELDINSP.WELDNDT.R	192.243	Do records indicate that NDT and interpretation are in accordance with 192.243?
11.	(and 1 other asset)	NA	DC.WELDPROCEDURE	2.	DC.WELDPROCEDURE.WELD.R	192.225	Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?
12.	(and 1 other asset)	NA	DC.DPC	27.	DC.DPC.VALVESPACE.O	192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))	Are transmission line valves being installed as required by 192.179?
13.	(and 1 other asset)	NA	DC.DPC	49.	DC.DPC.INTCORRODE.R	192.476(d) (192.476(b), 192.476(c), 192.476(a))	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?
14.	(and 1 other asset)	NA	DC.DPC	50.	DC.DPC.INTCORRODE.O	192.476(a) (192.476(b), 192.476(c))	Does the transmission project's design and construction comply with 192.476?
15.	(and 1 other asset)	NA	DC.MO	6.	DC.MO.MAOPLIMIT.O	192.605(b)(5)	During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?
16.	(and 1 other asset)	Sat	EP.ERG	2.	EP.ERG.REVIEW.R	192.605(a)	Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?
17.	(and 1 other asset)	NA	EP.ERG	6.	EP.ERG.NOTICES.R	192.615(a)(1)	Do records indicate receiving, identifying, classifying and communication of notices of events requiring immediate response in accordance with procedures?
18.	(and 1 other asset)	NA	EP.ERG	20.	EP.ERG.POSTEVTREVIEW.R	192.605(a) (192.615(b)(1)),	Do records indicate review of employee activities to determine whether the procedures were

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
						192.615(b)(3)	effectively followed in each emergency?
19.	(and 1 other asset)	Sat	(2)	EP.ERG	22. 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)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
20.	(and 1 other asset)	NA		IM.HC	6. IM.HC.HCANEW.R	192.947(d) (192.905(c))	Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?
21.	(and 1 other asset)	Sat		IM.HC	13. IM.HC.HCADATA.O	192.905(c)	Are HCAs correctly identified per up-to-date information?
22.	(and 1 other asset)	NA		MO.GC	2. MO.GC.CONVERSION.R	192.14(a) (192.14(b))	Do records indicate the process was followed for converting any pipelines into Part 192 service?
23.	(and 1 other asset)	Sat		MO.GOABNORMAL	2. MO.GOABNORMAL.ABNORMAL.R	192.605(a) (192.605(c)(1))	Did personnel respond to indications of abnormal operations as required by the process?
24.	(and 1 other asset)	Sat		MO.GOABNORMAL	6. MO.GOABNORMAL.ABNORMALREVIEW.R	192.605(a) (192.605(c)(4))	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?
25.	(and 1 other asset)	Sat		MO.GOCLASS	6. 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))	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?
26.	(and 1 other asset)	Sat	(2)	MO.GOCLASS	7. MO.GO.CONTSURVEILLANCE.R	192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))	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?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text	
27.	(and 1 other asset)	NA	(2)	MO.GOCLASS	8.	MO.GO.CONTSURVEILLANCE.O	192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))	Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?
28.	(and 1 other asset)	Sat		MO.GOMAOP	3.	MO.GOMAOP.MAOPDETERMINE.R	192.709(c) (192.619(a), 192.619(b))	Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?
29.	(and 1 other asset)	Sat		MO.GOMAOP	4.	MO.GOMAOP.MAOPLIMIT.R	192.603(b) (192.605(b)(5))	Do records indicate operation within MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices, was assured while starting up and shutting down any part of the pipeline?
30.	(and 1 other asset)	Sat	(2)	MO.GM	4.	MO.GM.RECORDS.R	192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))	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?
31.	(and 1 other asset)	Sat		MO.GM	6.	MO.GM.IGNITION.R	192.709 (192.751(a), 192.751(b), 192.751(c))	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?
32.	(and 1 other asset)	Sat		MO.GM	10.	MO.GM.VALVEINSPECT.R	192.709(c) (192.745(a), 192.745(b))	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?
33.	(and 1 other asset)	Sat		MO.GM	11.	MO.GM.VALVEINSPECT.O	192.745(a) (192.745(b))	Are field inspection and partial operation of transmission line valves adequate?
34.	(and 1 other asset)	Sat		MO.GOODOR	2.	MO.GOODOR.ODORIZE.R	192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))	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?
35.	(and 1 other asset)	Sat	(2)	MO.GO	2.	MO.GO.CONTSURVEILLANCE.R	192.709(c) (192.613(a), 192.613(b),	Do records indicate performance of continuing surveillance of facilities as required, and also the

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Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
						192.703(b), 192.703(c))	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?
36.	(and 1 other asset)	NA	(2)	MO.GO	3. MO.GO.CONTSURVEILLANCE.O	192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))	Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?
37.	(and 1 other asset)	Sat		MO.GO	6. MO.GO.OMANNUALREVIEW.R	192.605(a)	Has the operator conducted annual reviews of the written procedures or processes in the manual as required?
38.	(and 1 other asset)	Sat		MO.GO	8. MO.GO.OMEFFECTREVIEW.R	192.605(a) (192.605(b)(8))	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?
39.	(and 1 other asset)	Sat		MO.GO	10. MO.GO.OMHISTORY.R	192.605(a) (192.605(b)(3))	Are construction records, maps, and operating history available to appropriate operating personnel?
40.	(and 1 other asset)	Sat		MO.GO	11. MO.GO.OMHISTORY.O	192.605(b)(3)	Are construction records, maps and operating history available to appropriate operating personnel?
41.	(and 1 other asset)	NA		MO.GO	18. MO.GO.UPRATE.R	192.553(b) (192.553(a), 192.553(c), 192.553(d))	Do records indicate the pressure uprating process was implemented per the requirements of 192.553?
42.	(and 1 other asset)	NA		MO.GMOPP	2. MO.GMOPP.PRESSREGCAP.R	192.709(c) (192.743(a), 192.743(b), 192.743(c))	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?
43.	(and 1 other asset)	Sat	(2)	MO.GMOPP	3. MO.GM.RECORDS.R	192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))	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?
44.	(and 1 other asset)	Sat		MO.GMOPP	5. MO.GMOPP.PRESSREGTEST.R	192.709(c) (192.739(a), 192.739(b))	Do records indicate inspection and testing of pressure limiting, relief

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Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text	
							devices, and pressure regulating stations?	
45.	(and 1 other asset)	NA	MO.GMOPP	6.	MO.GMOPP.PRESSREGTEST.O	192.739(a) (192.739(b), 192.743)	Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?	
46.	(and 1 other asset)	Sat	(2)	MO.RW	2.	MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
47.	(and 1 other asset)	Sat	(2)	MO.RW	3.	MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?
48.	(and 1 other asset)	Sat	(2)	MO.RW	4.	MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?
49.	(and 1 other asset)	Sat		MO.RW	7.	MO.RW.LEAKAGE.R	192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))	Do records indicate leakage surveys conducted as required?
50.	(and 1 other asset)	Sat		PD.DP	7.	PD.DP.PDPROGRAM.R	192.614(c)	Does the damage prevention program meet minimum requirements specified in 192.614(c)?
51.	(and 1 other asset)	Sat		PD.PA	5.	PD.PA.AUDIENCEID.R	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?
52.	(and 1 other asset)	Sat	(2)	PD.PA	11.	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)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
53.	(and 1 other asset)	Sat		PD.PA	13.	PD.PA.LANGUAGE.R	192.616(g) (API RP 1162 Section 2.3.1)	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?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
54.	(and 1 other asset)	Sat (2)	PD.RW	2.	MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
55.	(and 1 other asset)	Sat (2)	PD.RW	3.	MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?
56.	(and 1 other asset)	Sat (2)	PD.RW	4.	MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?
57.	(and 1 other asset)	Sat	RPT.RR	1.	RPT.RR.ANNUALREPORT.R	191.17(a)	Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?
58.	(and 1 other asset)	NA	RPT.RR	3.	RPT.RR.IMMEDREPORT.R	191.5(a) (191.7(a))	Do records indicate immediate notifications of incidents were made in accordance with 191.5?
59.	(and 1 other asset)	NA	RPT.RR	8.	RPT.RR.INCIDENTREPORT.R	191.15(a) (192.624(a)(1), 192.624(a)(2))	Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?
60.	(and 1 other asset)	NA	RPT.RR	9.	RPT.RR.INCIDENTREPORTSUPP.R	191.15(d)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe using the most recent Form?
61.	(and 1 other asset)	NA	RPT.RR	11.	RPT.RR.SRCR.R	191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c))	Do records indicate safety-related condition reports were filed as required?
62.	(and 1 other asset)	Sat	RPT.RR	16.	RPT.RR.NPMSANNUAL.R	191.29(a) (191.29(b))	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?
63.	(and 1 other asset)	NA	RPT.RR	18.	RPT.RR.OPID.R	191.22(a) (191.22(c), 191.22(d))	Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
64.	(and 1 other asset)	Sat	TD.ATM	2.	TD.ATM.ATMCORRODE.R	192.491(c) (192.479(a), 192.479(b), 192.479(c))	Do records document the protection of above ground pipe from atmospheric corrosion?
65.	(and 1 other asset)	Sat	TD.ATM	4.	TD.ATM.ATMCORRODEINSP.R	192.491(c) (192.481(a), 192.481(b), 192.481(c))	Do records document inspection of aboveground pipe for atmospheric corrosion?
66.	(and 1 other asset)	Sat	TD.ATM	5.	TD.ATM.ATMCORRODEINSP.O	192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))	Is pipe that is exposed to atmospheric corrosion protected?
67.	(and 1 other asset)	Sat	TD.CPMONITOR	2.	TD.CPMONITOR.CURRENTTEST.R	192.491(c) (192.465(b))	Do records document details of electrical checks of sources of rectifiers or other impressed current sources?
68.	(and 1 other asset)	Sat	TD.CPMONITOR	3.	TD.CPMONITOR.MONITORCRITERIA.O	192.465(a) (192.463(a))	Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?
69.	(and 1 other asset)	Sat	TD.CPMONITOR	4.	TD.CPMONITOR.MONITORCRITERIA.R	192.491(c) (192.463(a))	Do records document that the CP monitoring criteria used was acceptable?
70.	(and 1 other asset)	Sat	TD.CPMONITOR	6.	TD.CPMONITOR.TEST.R	192.491(c) (192.465(a))	Do records adequately document cathodic protection monitoring tests have occurred as required?
71.	(and 1 other asset)	Sat	TD.CPMONITOR	8.	TD.CPMONITOR.CURRENTTEST.O	192.465(b)	Are impressed current sources properly maintained and are they functioning properly?
72.	(and 1 other asset)	Sat	TD.CPMONITOR	10.	TD.CPMONITOR.REVCURRENTTEST.R	192.491(c) (192.465(c))	Do records document details of electrical checks interference bonds, diodes, and reverse current switches?
73.	(and 1 other asset)	Sat	TD.CPMONITOR	11.	TD.CPMONITOR.REVCURRENTTEST.O	192.465(c)	Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?
74.	(and 1 other asset)	NA	TD.CPMONITOR	13.	TD.CPMONITOR.DEFICIENCY.R	192.491(c) (192.465(d))	Do records adequately document actions taken to correct any identified deficiencies in corrosion control?
75.	(and 1 other asset)	Sat	TD.CPMONITOR	18.	TD.CPMONITOR.TESTLEAD.R	192.491(c) (192.471(a), 192.471(b), 192.471(c))	Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?
76.	(and 1 other asset)	NA	TD.CPMONITOR	21.	TD.CPMONITOR.INTFRCURRENT.R	192.491(c) (192.473(a))	Do records document an effective program is in place to minimize detrimental effects of interference currents and

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Row	Asset	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text	
w	s	t		t #				
							that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?	
77.	(and 1 other asset)	NA		TD.CPMONITOR	22.	TD.CPMONITOR.INTFRCURRENT.O	192.473(a)	Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?
78.	(and 1 other asset)	Sat	(3)	TD.CPMONITOR	24.	TD.CP.RECORDS.R	192.491(a)	Do records indicate the location of all items listed in 192.491(a)?
79.	(and 1 other asset)	Sat		TD.CP	2.	TD.CP.POST1971.R	192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))	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?
80.	(and 1 other asset)	NA		TD.CP	5.	TD.CP.PRE1971.O	192.457(b)	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?
81.	(and 1 other asset)	NA		TD.CP	11.	TD.CP.UNPROTECT.R	192.491(c) (192.465(e))	Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?
82.	(and 1 other asset)	Sat		TD.CP	13.	TD.CP.ELECISOLATE.R	192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))	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?
83.	(and 1 other asset)	Sat		TD.CP	14.	TD.CP.ELECISOLATE.O	192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))	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?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row	Assets	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
84.	(and 1 other asset)	Sat (3)	TD.CP	21.	TD.CP.RECORDS.R	192.491(a)	Do records indicate the location of all items listed in 192.491(a)?
85.	(and 1 other asset)	Sat	TD.COAT	2.	TD.COAT.NEWPIPE.R	192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))	Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?
86.	(and 1 other asset)	Sat	TD.CPEXPOSED	2.	TD.CPEXPOSED.EXPOSEINSPECT.R	192.491(c) (192.459)	Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?
87.	(and 1 other asset)	NA	TD.CPEXPOSED	5.	TD.CPEXPOSED.EXTCORRODEEVAL.R	192.491(c) (192.485(a), 192.485(b), 192.485(c))	Do records adequately document the evaluation of externally corroded pipe?
88.	(and 1 other asset)	Sat (3)	TD.CPEXPOSED	9.	TD.CP.RECORDS.R	192.491(a)	Do records indicate the location of all items listed in 192.491(a)?
89.	(and 1 other asset)	NA	TD.ICP	2.	TD.ICP.EXAMINE.R	192.491(c) (192.475(a), 192.475(b))	Do records document examination of removed pipe for evidence of internal corrosion?
90.	(and 1 other asset)	NA	TD.ICP	5.	TD.ICP.EVALUATE.R	192.491(c) (192.485(c))	Do records document adequate evaluation of internally corroded pipe?
91.	(and 1 other asset)	NA	TD.ICP	7.	TD.ICP.REPAIR.R	192.485(a) (192.485(b))	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?
92.	(and 1 other asset)	NA	TD.ICCG	2.	TD.ICCG.CORRGAS.R	192.491(c) (192.475(a))	Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?
93.	(and 1 other asset)	NA	TD.ICCG	4.	TD.ICCG.CORRGASACTION.R	192.491(c) (192.477)	Do records document the actions taken when corrosive gas is being transported by pipeline?
94.	(and 1 other asset)	Sat	TQ.PROT9	2.	TQ.PROT9.TASKPERFORMANCE.O	192.801(a) (192.809(a))	Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.
95.	(and 1 other asset)	Sat	TQ.PROT9	3.	TQ.PROT9.QUALIFICATIONSTATUS.O	192.801(a) (192.809(a))	Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88968 (91)

Row	Asset	Result (Note 1)	Sub-Group	Qs	Question ID	References	Question Text
96.	(and 1 other asset)	Sat	TQ.PROT9	4.	TQ.PROT9.AOCRECOG.O	192.801(a) (192.809(a))	Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.
97.	(and 1 other asset)	Sat	TQ.PROT9	5.	TQ.PROT9.VERIFYQUAL.O	192.801(a) (192.809(a))	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.
98.	(and 1 other asset)	Sat	TQ.OQ	5.	TQ.OQ.OQCONTRACTOR.R	192.807(a) (192.807(b))	Are adequate records containing the required elements maintained for contractor personnel?
99.	(and 1 other asset)	Sat	TQ.OQ	6.	TQ.OQ.RECORDS.R	192.807	Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?
100.	(and 1 other asset)	Sat	TQ.QU	2.	TQ.QU.CORROSION.R	192.453 (192.807(a), 192.807(b))	Do records indicate qualification of personnel implementing pipeline corrosion control methods?
101.	(and 1 other asset)	Sat	TQ.QUOMCONST	4.	TQ.QUOMCONST.NDT.R	192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))	Do records indicate the qualification of nondestructive testing personnel?
102.	(and 1 other asset)	NA	TQ.QUOMCONST	5.	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))	Do records indicate that welders are adequately qualified?
103.	(and 1 other asset)	Sat	TQ.TR	2.	TQ.TR.TRAINING.R	192.615(b)(2) (192.807(a), 192.807(b))	Is training for emergency response personnel documented?

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

Report Parameters: All non-empty Results

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

FORM D: Intrastate GT Standard Records & Field 8076

UTC Standard Comprehensive Inspection Report
Intrastate GAS Transmission
FORM D: State-Specific Requirements

**** THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS TRANSMISSION OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE RECORDS" and "BASELINE FIELD OBSERVATIONS" MODULES IN THE MOST CURRENT WA-SPECIFIC GT QUESTION SET**

Inspector and Operator Information

Inspection Link 8076	Inspector - Lead Ritter, Dennis	Inspector - Assist
Operator Ferndale Pipeline System	Unit Ferndale Pipeline System	Records Location - City & State
Inspection Start Date 06-14-2021	Inspection Exit Interview Date 06-16-2021	Engineer Submit Date

You must include the following in your inspection summary:

- *Inspection Scope
- *Facilities visited and Total AFOD
- * Summary of Significant Findings

Inspection Scope and Summary

The 2021 Ferndale Pipeline System Inspection will use the IA GT Directives: Baseline Records; Small System Key Risks; Baseline Pipeline Field Inspection for compliance assessment.

The records inspection was conducted virtually using MS Teams. The records for answering the IA questions were presented online and all records asked for were produced during the inspection. There were no findings from the records review portion of the inspection. The field inspection was conducted in person and facilities visited as noted in the inspection-field.

Facilities visited and Total AFOD

June 14, 2021 records review via Teams 1 AFOD

June 15, 2021 records review 1/2 d; travel day to Bellingham WA 1/2 d-1 AFOD

June 16, 2021 Field Inspection: Ferndale to Sumas: 1AFOD

June 16, 2021 3:00 pm, Exit Interview: Jim Fraley and Scott Fitzgerald, BP DOT Compliance Advisors

Pipeline facilities were visited on June 16, 2021. The inspection began at the idled Alcoa Intalco Works Aluminum smelter in Ferndale WA. The meter station at Intalco was inspected for atmospheric corrosion. Cathodic protection readings were also taken. The 8" Intalco line was traced back to the BP Cherry Pt refinery meter station. No issues with PSP reads were noted in the records review. Therefore, PSP reads were taken at approximately 2.5 mile intervals along the line. Atmospheric corrosion was checked at Intalco and Cherry PT meter stations, all MLVs and Sumas meter station. There are no major water crossing on this line. 1 AFOD

Summary of Significant Findings (DO NOT Discuss Enforcement options)

There were no findings from the records or field inspection

Primary Operator contacts and/or participants

Jim Bruen DOT Team Leader-Programs

Jim Fraley DOT Compliance Advisor

Scott Fitzgerald DOT Compliance Advisor

Operator executive contact and mailing address for any official correspondence

John D'Andrea

Head of North American Operations and HSSE

BP Pipelines North America

30 S Wacker Dr

Chicago, Illinois 60606

Instructions and Ratings Definitions

INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

N/A- Not Applicable (does not apply to this operator or system)

N/C - Not Checked/Evaluated (was not inspected during this inspection)

INSPECTION RESULTS

Satisfactory Responses

15

Unsatisfactory Responses

0

Area of Concern Responses

0

Not Applicable Responses

19

Not Checked / Evaluated Responses

3

Satisfactory List

1,2,5,8,9,12,13,14,25,26,27,31,33,35,37,38

Unsatisfactory List

Area of Concern List

Not Applicable List

3,4,6,7,10,11,15,16,17,18,20,21,23,24,28,29,30,32,34,

Not Checked / Evaluated List

19,22,36,

Unanswered Questions

0

Unanswered Questions List

**If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the appropriate "RECORDS/FIELD OBSERVATION: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.

INTRASTATE GT RECORDS REVIEW

MAPPING RECORDS

Question 1

THIS QUESTION EXISTS IN IA AS RPT.RR.PIPELINEMAPPING.R Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

Q1 Reference

RCW 81.88.080

Q1 Result

Satisfactory

Q1 Notes

No changes on pipeline since last inspection. XMap and our paper maps have accurate location of pipeline.

Question 2

THIS QUESTION EXISTS IN IA AS RPT.RR.NPMSANNUAL.R Do records indicate that NPMS submissions are updated every 12 months if system modifications occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

Q2 Reference

PHMSA ADB 08-07

Q2 Result

Satisfactory

Q2 Notes

Reviewed PHMSA email stating NPMS was updated.

March 7, 2019 for year end 2018

March 6, 2019 for year end 2019

February 24, 2019 for year end 2020

Question 3

THIS QUESTION EXISTS IN IA AS DC.MO.RECORDUPDATE.R 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?

Q3 Reference

WAC 480-93-018(5)

Q3 Result

Not Applicable

Q3 Notes

No changes were made to maps since last inspection.

REPORTING RECORDS

Question 4

THIS QUESTION EXISTS IN IA AS RPT.RR.CONSTRUCTIONDEFECTS.R Do records indicate that the operator has submitted timely and complete (in accordance with WAC 480-93-200(10)) reports of construction defects and material failures that resulted in leaks? (Reports due annually on March 15 for the preceding calendar year).

Q4 Reference

WAC 480-93-200(10)(b)

Q4 Result

Not Applicable

Q4 Notes

No construction or material defects since last inspection

Question 5

THIS QUESTION EXISTS IN IA AS RPT.NR.CONTACTUPDATE.R 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? Do the procedures require immediate notification to the commission and municipal authorities if an emergency point of contact changes?

Q5 Reference	Q5 Result	Q5 Notes
WAC 480-93-200(11)	Satisfactory	Reviewed liason listing and reporting procedures.

Question 6

THIS QUESTION EXISTS IN IA AS RPT.RR.FAILUREANALYSIS.R) Do records indicate that the operator submits timely and complete written failure analysis reports within 5 days of completion of the failure analysis of any incident or hazardous condition due to construction defects or material failures?

Q6 Reference	Q6 Result	Q6 Notes
WAC 480-93-200(6)	Not Applicable	No failures to analyze since last inspection

Question 7

THIS QUESTION IS COVERED IN IA BY PD.DP.COMMISSIONREPORT.R. AND PD.DP.NOTICETOEXCAVATOR.R Do records indicate that the operator meets damage reporting requirements outlined in RCW 19.122.053(3) and WAC 480-93-200 (7), (8) and (9)?

Q7 Reference	Q7 Reference 2
RCW 19.122.053	WAC 480-93-200(7) (8) and (9)
Q7 Result	Q7 Notes
Not Applicable	No damage to or excavators digging with 35' of line without notice.

Question 8

Do records indicate that the operator filed with the commission, not later than March 15 of each year, applicable to the preceding calendar year: a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.2-1 annual report?

Q8 Reference	Q8 Result	Q8 Notes
WAC 480-93-200(10)	Satisfactory	Reviewed annual reports submitted to commission 2018-2020

DAMAGE PREVENTION RECORDS

Question 9

Do records indicate that the operator's locating and excavation practices are in compliance with all RCW 19.122 requirements for facility operators? Does the records sample indicate that locates are made within two business days?

Q9 Reference	Q9 Result	Q9 Notes
RCW 19.122	Satisfactory	Went from using Digtrac to Utilisphere (bought Digtrac). Looked at Sumas for Oct-Dec 2018-2020 WAN183457207 Oct 2018-job went on for while WAN 19543568 10/2/2019 HWA Geo sciences no work near pipe Digtrac WAN 19547238 11/1/2019 HWA Geo sciences no work near pipe Digtrac WAN 20425178 10/02/2020 Western Refinery Services Potholing 20447919 11/03/2020 Potelco replacing a transmission pole.

Question 10

THIS QUESTION EXISTS IN IA AS PD.DP.NOTICETOEXCAVATOR.R Do records indicate that the operator provides the following information to excavators who damage pipeline facilities? Notification requirements for excavators under RCW 19.122.050(1) A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 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.

Q10 Reference	Q10 Reference 2
RCW 19.122	WAC 480-93-200(8)
Q10 Result	Q10 Notes
Not Applicable	No damage to Ferndale Pipeline System occurred since the last inspection.

Question 11

THIS QUESTION EXISTS IN IA AS (PD.DP.COMMISSIONREPORT.R Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of any of the following activities? An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate;A person intentionally damages or removes marks indicating the location or presence of pipeline facilities.

Q11 Reference	Q11 Result	Q11 Notes
RCW 19.122	Not Applicable	No damage or digging within 35' of Ferndale Pipeline System occurred since the last inspection.

Question 12

Do records indicate that the operator uses a quality assurance program for monitoring the locating and marking of facilities? Does the operator conduct regular field audits of the performance of locators/contractors and implement appropriate corrective action when necessary?

Q12 Reference	Q12 Result	Q12 Notes
PHMSA State Program Question	Satisfactory	BP performs locates with its own personnel. They investigate all issues associated missed, late or inaccurate locates. They also send O&M team lead out to inspect locates for timeliness and accuracy. They have not had any missed, late

or inaccurate locates since the last inspection.

Question 13

Do records indicate that the operator's (organic or contracted) locator and excavator personnel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

Q13 Reference	Q13 Result	Q13 Notes
WAC 480-93-013	Satisfactory	Reviewed OQs for personnel who performed locating for records reviewed. Charles Grove 19 June 21 (3 year qualification) Kevin Washington 25 Sep 21

Question 14

Do records indicate that the operator is meeting requirements in RCW 19.122.035 with respect to their duties after notice of excavation? Are examinations of uncovered pipe conducted prior to reburial? Does the operator immediately notify local first responders and the commission of any blowing gas leak that has ignited or represents a probable hazard to persons or property?

Q14 Reference	Q14 Result	Q14 Notes
RCW 19.122.035	Satisfactory	Note there were no signs of damage for the dig tickets and excavation activities reviewed below: Went from using Digtrac to Utilisphere (bought Digtrac). Looked at Sumas for Oct-Dec 2018-2020 WAN183457207 Oct 2018-job went on for while WAN 19543568 10/2/2019 HWA Geo sciences no work near pipe Digtrac WAN 19547238 11/1/2019 HWA Geo sciences no work near pipe Digtrac WAN 20425178 10/02/2020 Western Refinery Services Potholing 20447919 11/03/2020 Potelco replacing a transmission pole.

Question 15

Do records indicate that the operator reviews records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

Q15 Reference	Q15 Result	Q15 Notes
PHMSA State Programs Emphasis - no link	Not Applicable	Operator has not had any incidents or failures due to excavation damage.

DESIGN/CONSTRUCTION RECORDS

Question 16

THIS QUESTION EXISTS IN IA AS RPT.NR.CONSTRUCTIONREPORT.R Do records indicate that the operator is providing notice of proposed new construction or replacement of existing gas transmission lines greater than 100 feet in length is provided in a complete and timely manner in accordance with WAC 480-93-160?

Q16 Reference	Q16 Result	Q16 Notes
WAC 480-93-160	Not Applicable	No new construction since last inspection

Question 17

Do records indicate that the operator ensures each new transmission line and each replacement of line pipe, valve, fitting, or other line component of a transmission line is designed and constructed to accommodate passage of an internal inspection device?

Q17 Reference	Q17 Result	Q17 Notes
WAC 480-93-180	Not Applicable	No new construction since last inspection

Question 18

Do records indicate that plastic pipe joiners are re-qualified within 1 year/NTE 15 months? Do records indicate the operator tracks production joints or re-qualifies joiners within the annual requirement if no joints made within any 12-month period in accordance with WAC 480-94-080(2)?

Q18 Reference	Q18 Result	Q18 Notes
WAC 480-93-160	Not Applicable	No PE in system

Question 19

Are the operator's welding qualification and identification records compliant with WAC 480-93-080(1)? Do records indicate that when testing welders or qualifying procedures, the operator is using the necessary testing equipment and recording/documenting all essential variables?

Q19 Reference	Q19 Result	Q19 Notes
WAC 480-93-080(1)	Not Checked/Evaluated	There have been no construction projects requiring welding or welders since the last inspection, so no records were evaluated

Question 20

THIS QUESTION EXISTS IN IA AS DC.DPCOPP.MULTISTAGE.R Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130? Does the operator ensure, when practical, that there is a minimum of fifty feet of separation between regulator stages?

Q20 Reference	Q20 Result	Q20 Notes
WAC 480-93-130	Not Applicable	No new regulators in system since last inspection (or since original construction!)

Question 21

Do construction/installation records indicate that the operator is complying with WAC 480-93-115 requirements to seal the casing ends of any transmission line installed in a casing or conduit? If casings are installed, is the operator installing only bare steel casings?

Q21 Reference	Q21 Result	Q21 Notes
WAC 480-93-115	Not Applicable	No new casings installed since last inspection. All existing casings are bare steel and sealed. No shorted casings.

Question 22

THIS QUESTION EXISTS IN IA AS DC.PT.PRESSTEST.R Do records indicate that the operator performs pressure tests on all new or replacement gas pipeline installations?

Q22 Reference	Q22 Result	Q22 Notes
WAC 480-93-170(2)	Not Checked/Evaluated	There has been no pressure testing for new or replacement components since the last inspection

Question 23

Do records indicate that the operator locates compressor stations consistent with the requirements in WAC 480-93-040?

Q23 Reference	Q23 Result	Q23 Notes
WAC 480-93-040	Not Applicable	There are no compressor stations in the system

Question 24

Do records indicate that the operator is reporting, conducting, and documenting pressure testing in accordance with the list of requirements in WAC 480-93-170?

Q24 Reference	Q24 Result	Q24 Notes
WAC 480-93-170	Not Applicable	There has been no pressure testing since the last inspection

CORROSION CONTROL RECORDS

Question 25

Do the operator's cathodic protection records demonstrate that all CP-related surveys, reads, and tests are conducted in accordance with the requirements in WAC 480-93-110? Do records indicate that the operator documents/records the condition of all underground metallic facilities each time the facility is exposed? Does the operator conduct CP test reads on all exposed facilities where the coating has been removed?

Q25 Reference	Q25 Result	Q25 Notes
WAC 480-93-110	Satisfactory	Checked annual PSP surveys, rectifiers, bonds, and casings for 2018-2020. Ferndale Gas had one ILI dig in 2019 where coating was removed -APPLUS NDE inspector:16" Mainline, MP 516+70 ILI dig 7/2/20- sanded pipe at indication, and recoated. No repair necessary.PSP read -1524 well bonded coating

Question 26

THIS QUESTION EXISTS IN IA AS MO.RW.CASINGLEAKSURVEY.R Do corrosion control records demonstrate that the operator is complying with testing intervals for casings (NTE 15 months), confirmatory follow-up on shorted casings within ninety (90) days of discovery, leak surveys of shorted casings (NTE 7.5 months) and test equipment accuracy checks in accordance with WAC 480-93-110(3) and (5)?

Q26 Reference	Q26 Result	Q26 Notes
WAC 480-93-110(3) and (5)	Satisfactory	All casings were read annually and there were no shorts.

Question 27

Do corrosion control records demonstrate that the operator is adhering to its programs for monitoring atmospheric corrosion and taking action within required timeframes for completing remedial action? Do the records demonstrate appropriate monitoring for indications of internal corrosion? Do records demonstrate that the operator has taken appropriate remedial action for areas where internal corrosion is detected?

Q27 Reference	Q27 Result	Q27 Notes
WAC 480-93-110	Satisfactory	ACM-part of corrosion control management system Brian Stone, supervisor Gerry Wismer, local CP Tech Reviewed AC records for 2019 and 2020 which pertain to the 3-yr window applicable to this inspection: pipe and transcond-SAI 5 MLVs Cherry Pt meter station Intalco plant Sumas facility

Question 28

For casings without test leads installed prior to September 5, 1992, is the operator able to demonstrate that other test/inspection methods are acceptable, and that test leads are not necessary to monitor for electrical isolation and adequate cathodic protection levels?

Q28 Reference	Q28 Result	Q28 Notes
WAC 480-93-110(5)(a)	Not Applicable	Casings have test leads and/or vents

OPERATIONS & MAINTENANCE RECORDS

Question 29

Do leak records demonstrate the operator performs detailed gas leak investigation, evaluation, classification, and remedial action/repair prioritization steps in compliance with WACs 480-93-185, -186, and -18601?

Q29 Reference	Q29 Reference 2	Q29 Reference 3
WAC 480-93-185	WAC 480-93-186	WAC 480-93-18601

Q29 Result	Q29 Notes
Not Applicable	There were no leaks on the system since the last inspection

Question 30

THIS QUESTION EXISTS IN IA AS MO.RW.LEAKRECORDS.R Do leak records meet all content requirements consistent with the criteria in WAC 480-93-187(1-13)?

Q30 Reference	Q30 Result	Q30 Notes
WAC 480-93-187	Not Applicable	There were no leaks on the system since the last inspection

Question 31

THIS QUESTION EXISTS IN IA AS MO.RW.SPECIALLEAKSURVEY.R Do leak survey records demonstrate compliance with the instrumentation, accuracy, survey interval, records retention, and self-audit of the leak survey program requirements as specified in WAC 480-93-188?

Q31 Reference	Q31 Result	Q31 Notes
WAC 480-93-188	Satisfactory	Reviewed leakage surveys 2018-2020. Annual for Class 1 and 2 and twice annually for Class 3/4 (March and September)

Question 32

THIS QUESTION EXISTS IN IA AS MO.RW.SPECIALLEAKSURVEY.R Do leak survey records indicate that the operator is performing special leak surveys under all conditions specified in WAC 480-93-188(4)?

Q32 Reference	Q32 Result	Q32 Notes
WAC 480-93-188(4)	Not Applicable	There have been no special leak surveys since the last inspection

Question 33

Do maintenance records indicate that valve maintenance is performed consistent with the requirements in WAC 480-93-100?

Q33 Reference	Q33 Result	Q33 Notes
WAC 480-93-100	Satisfactory	Reviewed all valves 2018-2020-2 times per year randomly picked valves to review work orders Asset # 21769 Cherry Pt 6" Line Break valve WO 7180009 #21650 WO 7339657 DOT 16" MLV 1 MOV 512 WO 7312420 Receiver inlet valve MOV 404 WO 6986129 Launcher bypass valve

Question 34

THIS QUESTION EXISTS IN IA AS RPT.NR.PROXIMITYREQUEST.R Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?

Q34 Reference	Q34 Result	Q34 Notes
WAC 480-93-020	Not Applicable	There have been no proximity requests since the last inspection

Question 35

Do odorization records demonstrate appropriate odorization levels, testing, instrumentation, calibration, and adherence to applicable intervals in accordance with WAC 480-93-015? Does the operator retain records of tests performed and equipment calibration for 5 years? Does the operator take prompt action to investigate and remediate odorant concentrations not meeting the minimum requirements (as applicable)?

Q35 Reference	Q35 Result	Q35 Notes
WAC 480-93-015	Satisfactory	Reviewed 2018- 5/2021 monthly odorant reads. Reads are at Cherry Pt --0.051

RECORDS: SUMMARY OF REQUIRED COMMENTS

RECORDS REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment

Question 3-No changes were made to maps since last inspection

Question 4-No construction or material defects since last inspection

Question 6-No failures to analyze since last inspection

Question 7-No damage to or excavators digging with 35' of line without notice.

Question 10-No damage to Ferndale Pipeline System occurred since the last inspection.

Question 11-No damage or digging within 35' of Ferndale Pipeline System occurred since the last inspection.

Question 15-Operator has not had any incidents or failures due to excavation damage.

Question 16,17-No new construction since last inspection

Question 18-No PE in system

Question 19-There have been no construction projects requiring welding or welders since the last inspection, so no records were evaluated

Question 20-No new regulators in system since last inspection (or since original construction!)

Question 21-No new casings installed since last inspection. All existing casings are bare steel and sealed. No shorted casings.

Question 22-There has been no pressure testing for new or replacement components since the last inspection

Question 23-There are no compressor stations in the system

Question 24-There has been no pressure testing since the last inspection

Question 28-Casings have test leads and/or vents

Question 29,30-There were no leaks on the system since the last inspection

Question 32-There have been no special leak surveys since the last inspection

Question 34-There have been no proximity requests since the last inspection

INTRASTATE GT: FIELD OBSERVATIONS

Question 36

Is gas odorized at a concentration in air of at least one-fifth of the lower explosive limit (LEL) so that gas is readily detectable by a person with a normal sense of smell?

Q36	Q36 Result	Q36 Notes
Reference WAC 480-93-015	Not Checked/Evaluated	Did not check as operator's technician didn't know they were performing this task and didn't bring odorometer. As records were all satisfactory, will check during next scheduled audit.

Question 37

Are pipeline markers in place and consistent with all requirements in WAC 480-93-124?

Q37	Q37 Result	Q37 Notes
Reference WAC 480-75-330	Satisfactory	All markers checked (they are noted in XMAP) were found and in good shape.

Question 38

Are installed casings consistent with the requirements in WAC 480-93-115? Are all casings bare steel? Are casings sealed? Do unvented casings have separate test leads for casing and pipe to ensure shorted conditions do not exist? Are adequate levels of CP being applied to the operator's pipe?

Q38	Q38 Result	Q38 Notes
Reference WAC 480-93-115	Satisfactory	No bad test leads on casings. All casings have test leads and vents. All are bare steel.

FIELD: SUMMARY OF REQUIRED COMMENTS

FIELD OBSERVATIONS SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above and ensure you annotate the question number for each comment.

Question 36-Did not check as operator's technician didn't know they were performing this task and didn't bring odorometer. As records were all satisfactory, will check during next scheduled audit.