

Inspection Output (IOR)

Generated on 2021.March.04 20:26

Inspection Information

Inspection Name	8088 & 8089 Ferndale TIMP OM	Operator(s)	FERNDALE PIPELINE SYSTEM (570)	Plan Submitted	09/01/2020
Status	PLANNED	Lead	Lex Vinsel	Plan Approval	09/03/2020 by Joe Subsits
Start Year	2020	Team Members	Scott Anderson	All Activity Start	12/15/2020
System Type	GT	Observer(s)	Scott Rukke, David Cullom, Anthony Dorrough, Deborah Becker, Derek Norwood, Darren Tinnerstet, Rell Koizumi	All Activity End	03/03/2021
Protocol Set ID	GT.2020.01	Supervisor	Joe Subsits, Marion Garcia, Seth Perkins	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

Scope of this inspection is for the last 3 calendar years. (2017- 2018-2019)

Facilities visited and Total AFOD

Limited facilities visits due to COVAD pandemic. Some ROW inspections performed on Olympic Pipeline IntraState Laterals.

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

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Primary Operator contacts and/or participants

Jim Bruen - (630)779-6994

Operator executive contact and mailing address for any official correspondence

Gerald Maret,

Vice-President US Pipelines and Logistics

British Petroleum - North America

M.C. 95 305 Wacker Drive

Chicago, Illinois 60606

gerald.maret@bp.com

03Jan21 - 2020 Inspections for BP NA Ferndale, Gas IntraState Pipeline

Scope (Assets)

Short # Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88968 (91)	Ferndale Pipeline System	unit	88968	Storage Fields Bottle/Pipe - Holders Service Line Offshore GOM Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP OCS CDA	293	293	293	293	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)	GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail
2. 88968 (91)	Baseline Procedures (Form 1)	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	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1 8088 Ferndale TIM P	--	03/01/2021 03/03/2021	GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	all assets	all types	174	174	174	174	100.0%
2 8089 Ferndale OM	--	12/15/2020 01/29/2021	Baseline Procedure s (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	all assets	all types	121	121	121	121	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	8088 Ferndale TIMP	COMPLETED	03/04/2021	8088 Ferndale TIMP	88968 (91)
2.	Attendance List	8089 Ferndale OM	COMPLETED	01/30/2021	8089 Ferndale OM	--

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) (309)

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
1.	(and 1 other asset)	NA		AR.CDA	8.	AR.CDA.CDACORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?	
2.	(and 1 other asset)	NA		AR.CDA	9.	AR.CDA.CDACORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats identified by CDA as required?	
3.	(and 1 other asset)	NA		AR.EC	1.	AR.EC.ECDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?	
4.	(and 1 other asset)	NA		AR.EC	2.	AR.EC.ECDAPREASSESS.R	192.947(g) (192.925(b)(1))	Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?	
5.	(and 1 other asset)	NA		AR.EC	3.	AR.EC.ECDAREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?	
6.	(and 1 other asset)	NA		AR.EC	4.	AR.EC.ECDAREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?	

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

Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
7.	(and 1 other asset)	NA	AR.EC	5.	AR.EC.ECDAPLAN.P	192.925(a) (192.925(b))	Is an adequate ECDA plan and process in place for conducting ECDA?	
8.	(and 1 other asset)	NA	AR.EC	6.	AR.EC.ECDAINTEGRATION.P	192.917(b) (ASME B31.8S-2004 Section 4.5)	Is the process for integrating ECDA results with other information adequate?	
9.	(and 1 other asset)	NA	AR.EC	7.	AR.EC.ECDAINTEGRATION.R	192.947(g) (192.917(b))	Do records demonstrate that the operator integrated other data/information when evaluating data/results?	
10.	(and 1 other asset)	NA	AR.EC	8.	AR.EC.ECDAREGION.R	192.947(g) (192.925(b)(1))	Do records demonstrate that the operator identified ECDA Regions?	
11.	(and 1 other asset)	NA	AR.EC	9.	AR.EC.ECDAINDIRECT.R	192.947(g) (192.925(b)(2))	Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?	
12.	(and 1 other asset)	NA	AR.EC	10.	AR.EC.ECDADIRECT.R	192.947(g) (192.925(b)(3))	Do records demonstrate that excavations, direct examinations, and data collection were performed in accordance with NACE SP 0502-2010, Sections 5 and 6.4.2 and ASME B31.8S-2004, Section 6.4?	
13.	(and 1 other asset)	NA	AR.EC	14.	AR.EC.ECDAPLANMOC.R	192.947(g) (192.925(b)(3)(iii))	Do records demonstrate that changes in the ECDA plan have been implemented and documented?	
14.	(and 1 other asset)	NA	AR.EC	15.	AR.EC.ECDAPOSTASSESS.R	192.947(g) (192.925(b)(4))	Do records demonstrate that the requirements for post-assessment were met?	
15.	(and 1 other asset)	NA	AR.EC	18.	AR.EC.ECCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant external corrosion threats?	
16.	(and 1 other asset)	NA	AR.EC	19.	AR.EC.ECCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant external	

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

Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
							corrosion threats as required?	
17.	(and 1 other asset)	NA	AR.IC	1.	AR.IC.ICDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?	
18.	(and 1 other asset)	NA	AR.IC	2.	AR.IC.ICDAREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ICDA assessments or review and analyze assessment results, are qualified for the tasks they perform?	
19.	(and 1 other asset)	NA	AR.IC	3.	AR.IC.ICDAREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?	
20.	(and 1 other asset)	NA	AR.IC	4.	AR.IC.ICDAPLAN.P	192.927(c) (192.927(a), 192.927(b))	Is an ICDA plan and process in place for conducting ICDA?	
21.	(and 1 other asset)	NA	AR.IC	5.	AR.IC.ICDAPREASSESS.R	192.927(c)(1) (192.947(g))	Do records demonstrate that the requirements for an ICDA pre-assessment were met?	
22.	(and 1 other asset)	NA	AR.IC	6.	AR.IC.ICDAINTEGRATION.P	192.917(b)	Is the process for integrating ICDA results with other information adequate?	
23.	(and 1 other asset)	NA	AR.IC	7.	AR.IC.ICDAINTEGRATION.R	192.917(b) (192.947(g))	Do records demonstrate that other data/information was integrated when evaluating data/results?	
24.	(and 1 other asset)	NA	AR.IC	8.	AR.IC.ICDAREGION.R	192.947(g) (192.927(c)(2), 192.927(c)(5))	Do records demonstrate that ICDA Regions were adequately identified?	
25.	(and 1 other asset)	NA	AR.IC	10.	AR.IC.ICDAPOSTASSESS.R	192.947(g) (192.927(c)(4)(i)	Do records demonstrate that the	

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

Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	other asset)), 192.927(c)(4)(ii), 192.477)	operator assessed the effectiveness of the ICDA process?	
26.	(and 1 other asset)	NA	AR.IC	13	AR.IC.ICCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant internal corrosion threats related to internal corrosion?	
27.	(and 1 other asset)	NA	AR.IC	14	AR.IC.ICCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant internal corrosion threats as required?	
28.	(and 1 other asset)	Sat	AR.IL	1.	AR.IL.ILIREVIEWQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria?	
29.	(and 1 other asset)	Sat	AR.IL	2.	AR.IL.ILIREVIEWQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?	
30.	(and 1 other asset)	NA	AR.IL	3.	AR.IL.ILIREVIEWQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?	
31.	(and 1 other asset)	Sat	AR.IL	4.	AR.IL.ILISPECS.P	192.921(a)(1) (192.933(b))	Does the process assure complete and adequate vendor ILI specifications?	
32.	(and 1 other asset)	Sat	AR.IL	5.	AR.IL.ILISPECS.R	192.947(g) (192.933(b))	Do records demonstrate that the ILI specifications were complete and adequate?	
33.	(and 1 other asset)	Sat	AR.IL	6.	AR.IL.ASSESSMETHOD.P	192.919(b) (192.921(a), 192.937(c))	Does the process specify the assessment methods that are appropriate for the pipeline specific integrity threats?	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
34.	(and 1 other asset)	Sat		AR.IL	7.	AR.IL.ASSESMETHOD.R	192.947(g) (192.919(b), 192.921(a), 192.937(c))	Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?	
35.	(and 1 other asset)	Sat		AR.IL	8.	AR.IL.ILIVALIDATE.P	192.921(a)(1) (192.937(c))	Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?	
36.	(and 1 other asset)	Sat		AR.IL	9.	AR.IL.ILIVALIDATE.R	192.947(g) (192.921(a)(1))	Do records demonstrate that the operator has validated ILI assessment results per their process?	
37.	(and 1 other asset)	NA		AR.IL	10.	AR.IL.ILIVALIDATE.O	192.921(a)(1)	From observation of field activities, do the employees and vendors validate ILI assessment results per their process?	
38.	(and 1 other asset)	Sat		AR.IL	11.	AR.IL.ILIINTEGRATION.P	192.917(b)	Is the process for integrating ILI results with other information adequate?	
39.	(and 1 other asset)	Sat		AR.IL	12.	AR.IL.ILIINTEGRATION.R	192.947(g) (192.917(b))	Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?	
40.	(and 1 other asset)	Sat		AR.IL	13.	AR.IL.ILIIACCEPCRITERIA.P	192.921(a)	Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?	
41.	(and 1 other asset)	Sat		AR.IL	14.	AR.IL.ILIIACCEPCRITERIA.R	192.947(g) (192.921(a))	Do records indicate adequate implementation of the process for ILI survey acceptance?	
42.	(and 1 other asset)	NA		AR.IL	15.	AR.IL.ILIDELAY.R	192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341)	Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?	
43.	(and 1 other asset)	NA		AR.IL	18.	AR.IL.ILIIMPLEMENT.O	192.921(a)(1) (192.620(d), 192.605(b))	Are O&M and IMP procedural requirements for the performance of ILI assessments followed?	
44.	(and 1 other asset)	Sat		AR.IL	19.	AR.IL.ILICORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats	

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

Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
							identified during in-line inspections?	
45.	(and 1 other asset)	Sat	AR.IL	20	AR.IL.ILCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?	
46.	(and 1 other asset)	NA	AR.LSR	1.	AR.LSR.LSRPLAN.P	192.941(a) (192.941(b), 192.941(c))	Is the process for performing low stress reassessment adequate?	
47.	(and 1 other asset)	NA	AR.LSR	2.	AR.LSR.LSRBA.R	192.947(d) (192.919(c), 192.921(d), 192.941(a))	Do records demonstrate that a baseline assessment meeting the requirements of 192.919 and 192.921 was performed prior to performing a low stress reassessment?	
48.	(and 1 other asset)	NA	AR.LSR	3.	AR.LSR.LSREXTCORR.R	192.947(d) (192.941(b))	Do records demonstrate that the requirements of 192.941(b) were implemented when performing low stress reassessment for external corrosion?	
49.	(and 1 other asset)	NA	AR.LSR	4.	AR.LSR.LSRINTCORR.R	192.947(d) (192.941(c))	Do records demonstrate that the requirements of 192.941(c) were implemented when performing low stress reassessment for internal corrosion?	
50.	(and 1 other asset)	NA	AR.LSR	5.	AR.LSR.LSRCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats following a LSR?	
51.	(and 1 other asset)	NA	AR.LSR	6.	AR.LSR.LSRCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following a LSR?	
52.	(and 1 other asset)	NA	AR.OT	1.	AR.OT.OTPLAN.P	192.921(a)(4)	Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?	
53.	(and 1 other asset)	NA	AR.OT	2.	AR.OT.OTPLAN.R	192.947(d) (192.921(a)(4), 192.933(b))	Do records demonstrate that the assessments were performed in	

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

Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
	asset)						accordance with the process and vendor recommendations and that defects were identified and categorized within 180 days, if applicable?	
54.	(and 1 other asset)	NA	AR.OT	3.	AR.OT.OTREVQUAL.P	192.915(a) (192.915(b), 192.921(a)(4))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?	
55.	(and 1 other asset)	NA	AR.OT	4.	AR.OT.OTREVQUAL.R	192.947(d) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?	
56.	(and 1 other asset)	NA	AR.OT	5.	AR.OT.OTREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?	
57.	(and 1 other asset)	NA	AR.OT	6.	AR.OT.OTPLAN.O	192.921(a)(4)	Were assessments conducted using "other technology" adequately performed in accordance with the OT process?	
58.	(and 1 other asset)	NA	AR.OT	7.	AR.OT.OTCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified using Other Technology?	
59.	(and 1 other asset)	NA	AR.OT	8.	AR.OT.OTCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following the use of Other Technology?	
60.	(and 1 other asset)	NA	AR.PTI	1.	AR.PTI.PRESSTESTREVQUAL.P	192.915(a) (192.915(b) 192.921(a)(4))	Does the process require that operator/vendor personnel (including supervisors) who	

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

Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
							review and evaluate pressure test assessment results meet appropriate training, experience, and qualification criteria?	
61.	(and 1 other asset)	NA	AR.PTI	2.	AR.PTI.PRESSTESTREVQUAL.R	192.947(g), 192.915(a), 192.915(b)	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?	
62.	(and 1 other asset)	Sat	AR.PTI	3.	AR.PTI.PRESSTESTACCEP.P	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), 192.921(a)(2))	Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?	
63.	(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?	
64.	(and 1 other asset)	NA	AR.PTI	6.	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)	From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
65.	(and 1 other asset)	NA		AR.PTI	7.	AR.PTI.PTICORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats?	
66.	(and 1 other asset)	NA		AR.PTI	8.	AR.PTI.PTICORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required?	
67.	(and 1 other asset)	Sat		AR.RC	2.	AR.RC.DISCOVERY.P	192.933(b)	Does the integrity assessment process properly define discovery and the required time frame?	
68.	(and 1 other asset)	Sat		AR.RC	3.	AR.RC.DISCOVERY.R	192.947(f) (192.933(b))	Do records demonstrate that discovery was declared in the required time frame or justification was documented?	
69.	(and 1 other asset)	Sat		AR.RC	4.	AR.RC.IMPRC.P	192.933(a) (192.933(c), 192.933(d))	Does the Integrity Management Plan and/or maintenance processes include all of the actions that must be taken to address integrity issues in accordance with 192.933?	
70.	(and 1 other asset)	NA		AR.RC	5.	AR.RC.PRESSREDUCE.R	192.947(f) (192.933(a)(1))	Do records demonstrate that an acceptable pressure reduction was promptly taken for each immediate repair condition or when a repair schedule could not be met?	
71.	(and 1 other asset)	Sat		AR.RC	8.	AR.RC.CRITERIA.P	192.711(b) (192.703(a), 192.703(b), 192.703(c), 192.713(a), 192.713(b))	Does the repair process cover all of the elements for making repairs in covered segments?	
72.	(and 1 other asset)	NA		AR.RC	9.	AR.RC.SCHEDULEIMPL.R	192.947(f) (192.933(d))	Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?	
73.	(and 1 other asset)	NA		AR.RC	10.	AR.RC.REMEDIATION.O	192.933(c) (192.933(a), 192.933(d))	Is anomaly remediation adequate for the covered segments being observed?	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
74.	(and 1 other asset)	Sat		AR.RC	11	AR.RC.LOOKBEYOND.P	192.917(e)(5)	Does the process require an evaluation of all pipeline segments with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?	
75.	(and 1 other asset)	NA		AR.RC	12	AR.RC.LOOKBEYOND.R	192.947(b), (192.917(e)(5), 192.459)	From the review of the results of integrity assessments, were all pipeline segments evaluated with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?	
76.	(and 1 other asset)	Sat		AR.RMP	1.	AR.RMP.SAFETY.P	192.605(b)(9) (192.713(b))	Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?	
77.	(and 1 other asset)	Sat		AR.RMP	3.	AR.RMP.IGNITION.P	192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))	Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?	
78.	(and 1 other asset)	Sat		AR.RMP	6.	AR.RMP.HOTTAP.P	192.605(b)(1) (192.627)	Is the process adequate for tapping pipelines under pressure?	
79.	(and 1 other asset)	Sat		AR.RMP	9.	AR.RMP.REPAIRREQT.P	192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))	Does the repair process capture the requirements of 192.711 for transmission lines?	
80.	(and 1 other asset)	Sat		AR.RMP	10	AR.RMP.FIELDREPAIRDEFECT.P	192.605(b)(1) (192.713(a), 192.713(b))	Is the process adequate for the permanent field repair of defects in transmission lines?	
81.	(and 1 other asset)	Sat		AR.RMP	13	AR.RMP.FIELDREPAIRWELDS.P	192.605(b) (192.715(a), 192.715(b), 192.715(c))	Is the process adequate for the permanent field repair of welds?	
82.	(and 1 other asset)	Sat		AR.RMP	20	AR.RMP.FIELDREPAIRLEAK.P	192.605(b) (192.717(a), 192.717(b))	Is there an adequate process for the permanent field repair of leaks on transmission lines?	
83.	(and 1 other asset)	Sat		AR.RMP	23	AR.RMP.WELDTTEST.P	192.605(b) (192.719(a), 192.719(b))	Is the process adequate for the testing of replacement pipe and repairs made	

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Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
	asset)						by welding on transmission lines?	
84.	(and 1 other asset)	Sat	AR.RMP	26	AR.RMP.CRACKNDT.P	192.929(b) (ASME B31.8S-2004 Appendix A3.4)	Does the process require that when a pipeline segment that meets the conditions for cracking and/or possible SCC is exposed (i.e., the coating is removed), an NDE method (e.g., MPI, UT) is employed to evaluate for cracking?	
85.	(and 1 other asset)	NA	AR.SCC	1.	AR.SCC.SCCDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?	
86.	(and 1 other asset)	NA	AR.SCC	2.	AR.SCC.SCCDAREVQUAL.R	192.947(e) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?	
87.	(and 1 other asset)	NA	AR.SCC	3.	AR.SCC.SCCDAREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?	
88.	(and 1 other asset)	NA	AR.SCC	4.	AR.SCC.SCCDAPLAN.P	192.929(b)	Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?	
89.	(and 1 other asset)	NA	AR.SCC	5.	AR.SCC.SCCDADATA.R	192.947(g) (192.929(b)(1))	Do records demonstrate that data was collected and evaluated?	
90.	(and 1 other asset)	NA	AR.SCC	6.	AR.SCC.SCCDAMETHOD.R	192.947(g) (192.929(b)(2))	Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
91.	(and 1 other asset)	NA		AR.SCC	7.	AR.SCC.SCCDAMETHOD.O	192.929	From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?	
92.	(and 1 other asset)	NA		AR.SCC	8.	AR.SCC.SCCDANEARNEUTRAL.R	192.947(g) (192.929(b)(2))	From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?	
93.	(and 1 other asset)	NA		AR.SCC	9.	AR.SCC.SCCDAREASSESSINTRV L.R	192.947(d) (192.939(a)(3))	From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?	
94.	(and 1 other asset)	NA		AR.SCC	11	AR.SCC.SCCCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats found following SCCDA?	
95.	(and 1 other asset)	NA		AR.SCC	12	AR.SCC.SCCCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following SCCDA?	
96.	(and 1 other asset)	Sat	(2)	DC.COCMP	2.	DC.COCMP.CMPCOMBUSTIBLE.P	192.303 (192.735(a), 192.735(b))	Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?	
97.	(and 1 other asset)	Sat		DC.WELDINSP	1.	DC.WELDINSP.WELDVISUALQUAL.P	192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)	Does the operator have comprehensive written specifications or procedures for the inspection and testing of welds that meet the requirements of 192.241?	
98.	(and 1 other asset)	Sat		DC.WELDINSP	4.	DC.WELDINSP.WELDNDT.P	192.243	Is there a process for nondestructive testing and interpretation in accordance with 192.243?	
99.	(and 1 other asset)	Sat		DC.WELDINSP	7.	DC.WELDINSP.WELDREPAIR.P	192.245 (192.303)	Does the process require welds that are unacceptable to be removed and/or	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	asset)							repaired as specified by 192.245?	
100	(and 1 other asset)	Sat		DC.WELDPROCEDURE	1.	DC.WELDPROCEDURE.WELD.P	192.225	Does the operator have written specifications requiring qualified welding procedures in accordance with 192.225?	
101	(and 1 other asset)	Sat		DC.WELDPROCEDURE	7.	DC.WELDPROCEDURE.WELDWEATHER.P	192.231 (192.225, 192.227)	Does the operator have written specifications that require the welding operation to be protected from weather conditions that would impair the quality of the completed weld?	
102	(and 1 other asset)	Sat		DC.WELDPROCEDURE	10.	DC.WELDPROCEDURE.MITERJOINT.P	192.233	Does the operator have written specifications or procedures that prohibit the use of certain miter joints as required by 192.233?	
103	(and 1 other asset)	Sat		DC.WELDPROCEDURE	13.	DC.WELDPROCEDURE.WELDPREP.P	192.235	Does the operator have comprehensive written specifications or procedures that require preparations for welding in accordance with 192.235?	
104	(and 1 other asset)	Sat	(2)	DC.COMM	5.	MO.GO.PURGE.P	192.605(b)(1) (192.629(a), 192.629(b))	Does the process include requirements for purging of pipelines in accordance with 192.629?	
105	(and 1 other asset)	Sat	(2)	DC.COMM	6.	EP.ERG.NOTICES.P	192.615(a)(1)	Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?	
106	(and 1 other asset)	Sat	(2)	DC.COMM	7.	EP.ERG.COMMSYS.P	192.615(a) (192.615(a)(2))	Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?	
107	(and 1 other asset)	Sat	(2)	DC.COMM	22.	IM.PM.PMMGENERAL.P	192.935(a)	Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								pipeline failure in a high consequence area?	
108	(and 1 other asset)	Sat	(2)	DC.COMM	23	IM.PM.PMMGENERAL.R	192.947(d) (192.935(a))	Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?	
109	(and 1 other asset)	Sat	(2)	DC.COMM	24	IM.HC.HCAID.R	192.947(d) (192.905(a), 192.907(a), 192.911(a))	Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?	
110	(and 1 other asset)	NA	(2)	DC.COMM	25	IM.HC.HCADATA.O	192.905(c)	Are HCAs correctly identified per up-to-date information?	
111	(and 1 other asset)	Sat		DC.DPC	44	DC.DPC.INTCORRODE.P	192.453 (192.476(a), 192.476(b), 192.476(c))	Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?	
112	(and 1 other asset)	Sat		DC.MA	9	DC.MA.MARKING.P	192.63	Does the operator have specifications requiring pipe, valves, and fittings to be marked according to the requirements of 192.63?	
113	(and 1 other asset)	Sat		EP.ERG	1	EP.ERG.REVIEW.P	192.605(a)	Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?	
114	(and 1 other asset)	Sat		EP.ERG	4	EP.ERG.INCIDENTDATA.P	192.605(b)(4) (191.5(a))	Does the process include the steps necessary for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner?	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
115	(and 1 other asset)	Sat	(2)	EP.ERG	5.	EP.ERG.NOTICES.P	192.615(a)(1)	Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?	
116	(and 1 other asset)	Sat	(2)	EP.ERG	7.	EP.ERG.COMMSYS.P	192.615(a) (192.615(a)(2))	Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?	
117	(and 1 other asset)	Sat		EP.ERG	8.	EP.ERG.RESPONSE.P	192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))	Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?	
118	(and 1 other asset)	Sat		EP.ERG	9.	EP.ERG.READINESS.P	192.615(a) (192.615(a)(4))	Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?	
119	(and 1 other asset)	Sat		EP.ERG	11	EP.ERG.PUBLICPRIORITY.P	192.615(a) (192.615(a)(5))	Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?	
120	(and 1 other asset)	Sat		EP.ERG	12	EP.ERG.PRESSREDUCESD.P	192.615(a) (192.615(a)(6))	Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?	
121	(and 1 other asset)	Sat		EP.ERG	13	EP.ERG.PUBLICHAZ.P	192.605(a) (192.615(a)(7))	Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?	
122	(and 1 other asset)	Sat		EP.ERG	14	EP.ERG.AUTHORITIES.P	192.615(a) (192.615(a)(8))	Does the emergency plan include procedures for notifying appropriate	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	asset)							public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?	
123	(and 1 other asset)	Sat		EP.ERG	15	EP.ERG.OUTAGERESTORE.P	192.615(a) (192.615(a)(9))	Does the emergency plan include procedures for safely restoring any service outage?	
124	(and 1 other asset)	Sat		EP.ERG	16	EP.ERG.INCIDENTACTIONS.P	192.615(a) (192.615(a)(10))	Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?	
125	(and 1 other asset)	Sat		EP.ERG	17	EP.ERG.INCIDENTANALYSIS.P	192.617	Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?	
126	(and 1 other asset)	Sat		EP.ERG	19	EP.ERG.POSTEVTNTREVIEW.P	192.615(b)(3)	Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	
127	(and 1 other asset)	Sat		EP.ERG	21	EP.ERG.LIAISON.P	192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)	Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?	
128	(and 1 other asset)	Sat		FS.CSSYSROT	18	FS.CSSYSROT.CMPRELIEF.P	192.605(b)(1) (192.731(a), 192.731(b), 192.731(c))	Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks?	
129	(and 1 other asset)	Sat		FS.CSSYSROT	21	FS.CSSYSROT.CMPESDTEST.P	192.605(b) (192.731(c))	Does the process provide adequate detail for inspecting and testing compressor station emergency shutdown devices at	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								the required frequency?	
130	(and 1 other asset)	Sat		FS.CSSYSPROT	23	FS.CSSYSPROT.CMPGASDETREQ.P	192.605(b) (192.736(b))	Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings?	
131	(and 1 other asset)	Sat		FS.CSSYSPROT	24	FS.CSSYSPROT.CMPGASDETOM.P	192.605(b) (192.736(c))	Does the process give detail how gas detection and alarm systems in compressor stations will be maintained to function properly and do procedures require performance tests?	
132	(and 1 other asset)	Sat		FS.CS	16	FS.CS.CMPUSUD.P	192.605(b)(5) (192.605(b)(7))	Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?	
133	(and 1 other asset)	Sat		FS.CS	17	FS.CS.CMPMAINT.P	192.605(b)(6)	Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service?	
134	(and 1 other asset)	Sat	(2)	FS.CS	18	DC.COCMP.CMPCOMBUSTIBLE.P	192.303 (192.735(a), 192.735(b))	Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?	
135	(and 1 other asset)	Sat	(2)	FS.FG	1.	MO.GM.ABANDONPIPE.P	192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g))	Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?	
136	(and 1 other asset)	Sat	(2)	FS.FG	3.	FS.FG.VAULTINSPECT.P	192.605(b)(1) (192.749(a),	What are process requirements for	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
	other asset)						192.749(b), 192.749(c), 192.749(d)	inspecting vaults having a volumetric internal content of approximately 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?	
137	(and 1 other asset)	Sat		FS.VA	1.	FS.VA.CMPVLVTEST.P	192.605(b) (192.745(a), 192.745(b))	Does the process have requirements for transmission line valves that might be used in an emergency?	
138	(and 1 other asset)	Sat		IM.BA	1.	IM.BA.BAENVIRON.P	192.911(o) (192.919(e))	Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?	
139	(and 1 other asset)	Sat		IM.BA	2.	IM.BA.BAENVIRON.R	192.947(d) (192.911(o), 192.919(e))	Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?	
140	(and 1 other asset)	Sat		IM.BA	3.	IM.BA.BAMETHODS.P	192.919(b) (192.921(a), 192.921(c), 192.921(h))	Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?	
141	(and 1 other asset)	Sat		IM.BA	4.	IM.BA.BAMETHODS.R	192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))	Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?	
142	(and 1 other asset)	Sat		IM.BA	5.	IM.BA.BANEW.P	192.911(p) (192.905(c), 192.921(f), 192.921(g))	Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?	
143	(and 1 other asset)	NA		IM.BA	6.	IM.BA.BANEW.R	192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)	Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?	
144	(and 1 other asset)	Sat		IM.BA	7.	IM.BA.BASCHEDULE.P	192.917(c) (192.919(c), 192.921(b))	Did the BAP process require a schedule for completing the	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	asset)							assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?	
145	(and 1 other asset)	NA		IM.BA	8.	IM.BA.BASCHEDULE.R	192.947(c) (192.921(d))	Do records demonstrate that all BAP required assessments were completed as scheduled?	
146	(and 1 other asset)	NA		IM.BA	9.	IM.BA.BAENVIRON.O	192.911(o) (192.919(e))	From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?	
147	(and 1 other asset)	Sat		IM.CA	1.	IM.CA.LOWSTRESSREASSESS.P	192.941(a) (192.941(b), 192.941(c))	Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?	
148	(and 1 other asset)	Sat		IM.CA	2.	IM.CA.REASSESSINTERVAL.P	192.937(a) (192.939(a), 192.939(b), 192.913(c))	Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?	
149	(and 1 other asset)	NA		IM.CA	3.	IM.CA.LOWSTRESSREASSESS.R	192.947(d) (192.941(a), 192.941(b), 192.941(c))	Do records demonstrate that the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion is adequate and being performed as required?	
150	(and 1 other asset)	Sat		IM.CA	4.	IM.CA.PERIODICEVAL.P	192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))	Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?	
151	(and 1 other asset)	Sat		IM.CA	5.	IM.CA.PERIODICEVAL.R	192.947(d) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e), 192.937(b))	Do records demonstrate that periodic evaluations of pipeline integrity have been performed based on data integration and risk assessment to	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								identify the threats specific to each covered segment and the risk represented by these threats?	
152	(and 1 other asset)	Sat		IM.CA	6.	IM.CA.REASSESSINTERVAL.R	192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))	Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?	
153	(and 1 other asset)	Sat		IM.CA	7.	IM.CA.REASSESSMETHOD.P	192.937(c) (192.931)	Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?	
154	(and 1 other asset)	Sat		IM.CA	8.	IM.CA.REASSESSMETHOD.R	192.947(d) (192.937(c))	Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?	
155	(and 1 other asset)	Sat		IM.CA	9.	IM.CA.REASSESSWAIVER.P	192.943(a) (192.943(b))	Does the process include requirements for reassessment interval waivers (special permit per 190.341)?	
156	(and 1 other asset)	NA		IM.CA	10	IM.CA.REASSESSWAIVER.R	192.947(d) (192.943(a), 192.943(b))	Do records demonstrate that reassessment interval waivers (special permit per 190.341) have been adequately implemented, if applicable?	
157	(and 1 other asset)	Sat		IM.CA	11	IM.CA.REASSESEXCPERF.P	192.913(a) (192.913(b), 192.913(c))	Does the process include requirements for deviations from reassessment requirements based on exceptional performance?	
158	(and 1 other asset)	NA		IM.CA	12	IM.CA.REASSESEXCPERF.R	192.947(d) (192.913(a), 192.913(b), 192.913(c))	Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?	
159	(and 1 other asset)	Sat		IM.HC	1.	IM.HC.HCAID.P	192.905(a)	Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								applied to each pipeline for the identification of high consequence areas?	
160	(and 1 other asset)	Sat	(2)	IM.HC	2.	IM.HC.HCAID.R	192.947(d) (192.905(a), 192.907(a), 192.911(a))	Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?	
161	(and 1 other asset)	Sat		IM.HC	3.	IM.HC.HCAMETHOD1.P	192.903(1)(i) (192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))	Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?	
162	(and 1 other asset)	Sat		IM.HC	4.	IM.HC.HCAMETHOD2.P	192.903(2)(i) (192.903(2)(ii))	Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?	
163	(and 1 other asset)	Sat		IM.HC	5.	IM.HC.HCANEW.P	192.905(c)	Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?	
164	(and 1 other asset)	Sat		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?	
165	(and 1 other asset)	Sat		IM.HC	7.	IM.HC.HCAPIR.P	192.903 (192.905(a))	Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?	
166	(and 1 other asset)	Sat		IM.HC	8.	IM.HC.HCAPIR.R	192.947(d) (192.903, 192.905(a))	Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?	
167	(and 1 other asset)	Sat		IM.HC	9.	IM.HC.HCASITES.P	192.903 (192.905(b))	Does the process for identification of identified sites include the sources listed in	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	asset)							192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?	
168	(and 1 other asset)	Sat		IM.HC	10	IM.HC.HCASITES.R	192.947(d) (192.903, 192.905(b))	Do records indicate identification of identified sites being performed as required?	
169	(and 1 other asset)	NA		IM.HC	11	IM.HC.HCAMETHOD1.R	192.947(d) (192.903 (1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))	Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?	
170	(and 1 other asset)	Sat		IM.HC	12	IM.HC.HCAMETHOD2.R	192.947(d) (192.905(a), 192.903(2)(ii))	Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?	
171	(and 1 other asset)	NA	(2)	IM.HC	13	IM.HC.HCADATA.O	192.905(c)	Are HCAs correctly identified per up-to-date information?	
172	(and 1 other asset)	Sat	(2)	IM.PM	1.	IM.PM.PMMGENERAL.P	192.935(a)	Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?	
173	(and 1 other asset)	Sat	(2)	IM.PM	2.	IM.PM.PMMGENERAL.R	192.947(d) (192.935(a))	Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?	
174	(and 1 other asset)	Sat		IM.PM	3.	IM.PM.PMMTPD.P	192.917(e)(1) (192.935(b)(1), 192.935(e))	Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
175	(and 1 other asset)	Sat		IM.PM	4.	IM.PM.PMTPD.R	192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))	Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?	
176	(and 1 other asset)	Sat		IM.PM	5.	IM.PM.PMMREVQUAL.P	192.915(c)	Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?	
177	(and 1 other asset)	Sat		IM.PM	6.	IM.PM.PMMREVQUAL.R	192.947(e) (192.915(c))	Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?	
178	(and 1 other asset)	Sat		IM.PM	7.	IM.PM.PMTPDMSMYS.P	192.935(d) (192.935(e), 192 Appendix E Table E.II.1)	Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?	
179	(and 1 other asset)	NA		IM.PM	8.	IM.PM.PMTPDMSMYS.R	192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)	Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?	
180	(and 1 other asset)	Sat		IM.PM	9.	IM.PM.PMMPD.P	192.935(b)(2)	Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?	
181	(and 1 other asset)	Sat		IM.PM	10.	IM.PM.PMMPD.R	192.947(d) (192.935(b)(2))	Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?	
182	(and 1 other asset)	Sat		IM.PM	11.	IM.PM.PMMASORCV.P	192.935(c)	Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								high consequence areas?	
183	(and 1 other asset)	Sat		IM.PM	12	IM.PM.PMMASORCV.R	192.947(d) (192.935(c))	Do records demonstrate that the operator has determined, based on risk, whether automatic shut-off valves or remote control valves should be added to protect high consequence areas?	
184	(and 1 other asset)	NA		IM.PM	13	IM.PM.PMMIMPLEMENT.O	192.935(a)	Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?	
185	(and 1 other asset)	Sat		IM.PM	14	IM.PM.PMCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats?	
186	(and 1 other asset)	Sat		IM.PM	15	IM.PM.PMCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required?	
187	(and 1 other asset)	Sat		IM.QA	1.	IM.QA.QARM.P	192.911(l)	Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?	
188	(and 1 other asset)	Sat		IM.QA	2.	IM.QA.IMNONMANDT.P	192.7(a)	Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?	
189	(and 1 other asset)	Sat		IM.QA	5.	IM.QA.QARM.R	192.947(d) (192.911(l))	Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
190	(and 1 other asset)	Sat		IM.QA	6.	IM.QA.RECORDS.P	192.947(a), 192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i)	Is the process adequate to assure that required records are maintained for the useful life of the pipeline?	
191	(and 1 other asset)	Sat		IM.QA	7.	IM.QA.IMMOC.P	192.911(k), 192.909(a), 192.909(b)	Is the process for management of changes that may impact pipeline integrity adequate?	
192	(and 1 other asset)	Sat		IM.QA	8.	IM.QA.IMMOC.R	192.947(d), 192.909(a), 192.909(b), 192.911(k)	Do records demonstrate that changes that may impact pipeline integrity are being managed as required?	
193	(and 1 other asset)	Sat		IM.QA	9.	IM.QA.IMPERFEFFECTIVE.P	192.945(a), 192.913(b), 192.951)	Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?	
194	(and 1 other asset)	Sat		IM.QA	10.	IM.QA.IMPERFEFFECTIVE.R	192.947(d), 192.913(b), 192.945(a), 192.951)	Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?	
195	(and 1 other asset)	Sat		IM.QA	11.	IM.QA.IMPERFMETRIC.P	192.945(a), 192.913(b), 192.951)	Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?	
196	(and 1 other asset)	Sat		IM.QA	12.	IM.QA.IMPERFMETRIC.R	192.947(d), 192.913(b), 192.945(a), 192.951)	Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?	
197	(and 1 other asset)	Sat		IM.QA	13.	IM.QA.RECORDS.R	192.947(a), 192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i)	Are required records being maintained for the life of the pipeline?	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
198	(and 1 other asset)	Sat		IM.RA	1.	IM.RA.RADATA.P	192.917(b) (192.917(e)(1), 192.911(k))	Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?	
199	(and 1 other asset)	Sat		IM.RA	2.	IM.RA.RAMETHOD.P	192.917(c) (192.917(d))	Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment?	
200	(and 1 other asset)	Sat		IM.RA	3.	IM.RA.THREATID.R	192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))	Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?	
201	(and 1 other asset)	Sat		IM.RA	4.	IM.RA.RADATA.R	192.947(b) (192.917(b), 192.917(e)(1), 192.911(k))	Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?	
202	(and 1 other asset)	Sat		IM.RA	5.	IM.RA.THREATID.P	192.917(a) (192.917(e), 192.913(b)(1))	Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?	
203	(and 1 other asset)	Sat		IM.RA	6.	IM.RA.RAMETHOD.R	192.947(b) (192.917(c), 192.917(d))	Do records demonstrate that the risk assessment follows ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?	
204	(and 1 other asset)	Sat		IM.RA	7.	IM.RA.RAFACTORS.P	192.917(c)	Does the process include requirements for factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
205	(and 1 other asset)	Sat		IM.RA	8.	IM.RA.RAFACTORS.R	192.947(b) (192.917(c))	Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?	
206	(and 1 other asset)	Sat		IM.RA	9.	IM.RA.RAMOC.P	192.917(c)	Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?	
207	(and 1 other asset)	Sat		IM.RA	10.	IM.RA.RAMOC.R	192.947(b) (192.917(c))	Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?	
208	(and 1 other asset)	NA		IM.RA	11.	IM.RA.RAMOC.O	192.917(c)	Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?	
209	(and 1 other asset)	Sat		MO.GC	1.	MO.GC.CONVERSION.P	192.14(a) (192.14(b))	If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?	
210	(and 1 other asset)	Sat		MO.GOABNORMAL	1.	MO.GOABNORMAL.ABNORMAL.P	192.605(a) (192.605(c)(1))	Does the process fully address the responsibilities during and after an abnormal operation?	
211	(and 1 other asset)	Sat		MO.GOABNORMAL	3.	MO.GOABNORMAL.ABNORMALCHECK.P	192.605(a) (192.605(c)(2))	Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?	
212	(and 1 other asset)	Sat		MO.GOABNORMAL	4.	MO.GOABNORMAL.ABNORMALNOTIFY.P	192.605(a) (192.605(c)(3))	Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?	
213	(and 1 other asset)	Sat		MO.GOABNORMAL	5.	MO.GOABNORMAL.ABNORMALREVIEW.P	192.605(a) (192.605(c)(4))	Does the process include requirements for periodically reviewing the response of operator personnel	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?	
214	(and 1 other asset)	Sat		MO.GOCLASS	1.	MO.GOCLASS.CLASSLOCATEREV.P	192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), 192.611(d))	Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?	
215	(and 1 other asset)	Sat	(2)	MO.GOCLASS	3.	MO.GO.CONTSURVEILLANCE.P	192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))	Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?	
216	(and 1 other asset)	Sat		MO.GOCLASS	5.	MO.GOCLASS.CLASSLOCATESTUDY.P	192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))	Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?	
217	(and 1 other asset)	Sat		MO.GOMAOP	1.	MO.GOMAOP.MAOPDETERMINE.P	192.605(b)(1) (192.619(a), 192.619(b))	Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?	
218	(and 1 other asset)	Sat		MO.GOMAOP	2.	MO.GOMAOP.MAOPLIMIT.P	192.605(a) (192.605(b)(5))	Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
219	(and 1 other asset)	Sat	(2)	MO.GM	1.	MO.GM.ABANDONPIPE.P	192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g))	Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?	
220	(and 1 other asset)	Sat		MO.GM	5.	MO.GM.IGNITION.P	192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))	Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?	
221	(and 1 other asset)	Sat	(2)	MO.GM	8.	MO.GM.RECORDS.P	192.605(b)(1) (192.709(a), 192.709(b), 192.709(c))	Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?	
222	(and 1 other asset)	Sat		MO.GM	9.	MO.GM.VALVEINSPECT.P	192.605(b)(1) (192.745(a), 192.745(b))	Are their processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?	
223	(and 1 other asset)	Sat	(2)	MO.GM	12	FS.FG.VAULTINSPECT.P	192.605(b)(1) (192.749(a), 192.749(b), 192.749(c), 192.749(d))	What are process requirements for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?	
224	(and 1 other asset)	Sat		MO.GOODOR	1.	MO.GOODOR.ODORIZE.P	192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))	Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?	
225	(and 1 other asset)	Sat	(2)	MO.GO	1.	MO.GO.CONTSURVEILLANCE.P	192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))	Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								determined to be in unsatisfactory condition but on which no immediate hazard exists?	
226	(and 1 other asset)	Sat	(2)	MO.GO	4.	MO.GO.PURGE.P	192.605(b)(1) (192.629(a), 192.629(b))	Does the process include requirements for purging of pipelines in accordance with 192.629?	
227	(and 1 other asset)	Sat		MO.GO	5.	MO.GO.OMANNUALREVIEW.P	192.605(a)	Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?	
228	(and 1 other asset)	Sat		MO.GO	7.	MO.GO.OMEFFECTREVIEW.P	192.605(a) (192.605(b)(8))	Does the process include requirements for periodically reviewing 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?	
229	(and 1 other asset)	Sat		MO.GO	9.	MO.GO.OMHISTORY.P	192.605(a) (192.605(b)(3))	Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?	
230	(and 1 other asset)	Sat		MO.GO	13	MO.GO.SRC.P	192.605(a) (192.605(d), 191.23(a))	Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?	
231	(and 1 other asset)	Sat		MO.GO	16	MO.GO.ODDOR.P	192.605(a) (192.605(b)(11))	Does the process require prompt response to the report of a gas odor inside or near a building?	
232	(and 1 other asset)	Sat		MO.GO	17	MO.GO.UPRATE.P	192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))	Is the pressure uprating process consistent with the requirements of 192.553?	
233	(and 1 other asset)	Sat		MO.GMOPP	1.	MO.GMOPP.PRESSREGCAP.P	192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))	Does the process include procedures for ensuring that the capacity of each pressure relief device	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								at pressure limiting stations and pressure regulating stations is sufficient?	
234	(and 1 other asset)	Sat		MO.GMOPP	4.	MO.GMOPP.PRESSREGTEST.P	192.605(b)(1) (192.739(a), 192.739(b))	Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?	
235	(and 1 other asset)	Sat	(2)	MO.GMOPP	7.	MO.GM.RECORDS.P	192.605(b)(1) (192.709(a), 192.709(b), 192.709(c))	Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?	
236	(and 1 other asset)	Sat	(2)	MO.RW	1.	MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?	
237	(and 1 other asset)	Sat	(2)	MO.RW	5.	MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?	
238	(and 1 other asset)	Sat		MO.RW	6.	MO.RW.LEAKAGE.P	192.706 (192.706(a), 192.706(b), 192.935(d))	Does the process require leakage surveys to be conducted?	
239	(and 1 other asset)	Sat		PD.DP	1.	PD.DP.PDPROGRAM.P	192.614(a)	Is a damage prevention program approved and in place?	
240	(and 1 other asset)	Sat		PD.DP	2.	PD.DP.ONECALL.P	192.614(b)	Does the process require participation in qualified one-call systems?	
241	(and 1 other asset)	Sat		PD.DP	3.	PD.DP.EXCAVATEMARK.P	192.614(c)(5)	Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?	
242	(and 1 other asset)	Sat		PD.DP	4.	PD.DP.TPD.P	192.614(c)(1)	Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								with excavators along the system?	
243	(and 1 other asset)	Sat		PD.DP	5.	PD.DP.TPDONECALL.P	192.614(c)(3)	Does the process specify how reports of TPD are checked against One-Call tickets?	
244	(and 1 other asset)	Sat		PD.DP	8.	PD.DP.DPINFOGATHER.P	192.917(b)(192.935(b)(1)(ii))	Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?	
245	(and 1 other asset)	Sat		PD.DP	9.	PD.DP.DPINFOGATHER.R	192.947(b)(192.917(b), 192.935(b)(1)(ii))	Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?	
246	(and 1 other asset)	Sat		PD.PA	1.	PD.PA.ASSETS.P	192.616(b) (API RP 1162 Section 2.7 Step 4)	Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?	
247	(and 1 other asset)	Sat		PD.PA	2.	PD.PA.AUDIENCEID.P	192.616(d)(192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	Does the program establish methods to 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?	
248	(and 1 other asset)	Sat		PD.PA	3.	PD.PA.MGMTSUPPORT.P	192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)	Does the operator's program documentation demonstrate management support?	
249	(and 1 other asset)	Sat		PD.PA	4.	PD.PA.PROGRAM.P	192.616(a)(192.616(h))	Has the continuing public education (awareness) program been established as required?	
250	(and 1 other asset)	Sat		PD.PA	6.	PD.PA.MESSAGES.P	192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API	Does the program define the combination of messages, delivery methods, and delivery frequencies to	

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Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
							RP 1162 Section 5)	comprehensively reach all affected stakeholder audiences in all areas where gas is transported?	
251	(and 1 other asset)	Sat		PD.PA	7	PD.PA.SUPPLEMENTAL.P	192.616(c) (API RP 1162 Section 6.2)	Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?	
252	(and 1 other asset)	Sat		PD.PA	12	PD.PA.LANGUAGE.P	192.616(g) (API RP 1162 Section 2.3.1)	Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?	
253	(and 1 other asset)	Sat		PD.PA	14	PD.PA.EVALPLAN.P	192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)	Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?	
254	(and 1 other asset)	Sat	(2)	PD.RW	1	MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?	
255	(and 1 other asset)	Sat	(2)	PD.RW	5	MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?	
256	(and 1 other asset)	Sat		RPT.NR	14	RPT.NR.NOTIFYIMCHANGE.P	192.909(b)	Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?	
257	(and 1 other asset)	NA		RPT.NR	15	RPT.NR.NOTIFYIMCHANGE.R	192.947(i) (192.909(b))	Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?	
258	(and 1 other asset)	Sat		RPT.NR	16	RPT.NR.NOTIFYIMPRESS.P	192.933(a)(1)	Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation	

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Row	Assets	Result (Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
							and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?	
259	(and 1 other asset)	NA	RPT.NR	17	RPT.NR.NOTIFYIMPRESS.R	192.947(i) (192.933(a)(1))	Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?	
260	(and 1 other asset)	Sat	RPT.NR	18	RPT.NR.IMDEVIATERPT.P	192.913(b)(1)(vii)	Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?	
261	(and 1 other asset)	NA	RPT.NR	19	RPT.NR.IMDEVIATERPT.R	192.947(i) (192.913(b)(1)(vii))	Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?	
262	(and 1 other asset)	Sat	RPT.NR	20	RPT.NR.IMPERFRPT.P	192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)	Is there a process for annual reporting of integrity management performance data?	
263	(and 1 other asset)	Sat	RPT.NR	21	RPT.NR.IMPERFRPT.R	192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)	Do annual reports demonstrate that integrity management performance data were reported?	
264	(and 1 other asset)	Sat	RPT.RR	2	RPT.RR.IMMEDREPORT.P	191.5(b) (191.7)	Is there a process to immediately report incidents to the	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standards Issues
	asset)							National Response Center?	
265	(and 1 other asset)	Sat		RPT.RR	9	RPT.RR.INCIDENTREPORT.P	191.15(a)	Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?	
266	(and 1 other asset)	Sat		RPT.RR	10	RPT.RR.INCIDENTREPORTSUPP.P	191.15(d)	Does the process require preparation and filing of supplemental incident reports?	
267	(and 1 other asset)	Sat		RPT.RR	11	RPT.RR.SRCR.P	192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(b))	Do processes require reporting of safety-related conditions?	
268	(and 1 other asset)	Sat		RPT.RR	15	RPT.RR.ABANDONWATERFACILITY.P	192.605(b)(1) (192.727(g))	Does the process require reports to be filed for each abandoned offshore pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	
269	(and 1 other asset)	Sat		RPT.RR	17	RPT.RR.OPID.P	191.22(a) (191.22(c), 191.22(d))	Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/up rate?	
270	(and 1 other asset)	Sat		TD.ATM	1	TD.ATM.ATMCORRODE.P	192.605(b)(2) (192.479(a), 192.479(b), 192.479(c))	Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?	
271	(and 1 other asset)	Sat		TD.ATM	4	TD.ATM.ATMCORRODEINSP.P	192.605(b)(2) (192.481(a), 192.481(b), 192.481(c))	Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?	
272	(and 1 other asset)	Sat		TD.CPMONITOR	1	TD.CPMONITOR.MONITORCRITERIA.P	192.605(b)(2) (192.463(a), 192.463(c))	Does the process require CP monitoring criteria to be used that is acceptable?	
273	(and 1 other	Sat		TD.CPMONITOR	5	TD.CPMONITOR.TEST.P	192.605(b)(2) (192.465(a))	Does the process adequately describe how to monitor CP that	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	asset)							has been applied to pipelines?	
274	(and 1 other asset)	Sat		TD.CPMONITOR	7.	TD.CPMONITOR.CURRENTTEST.P	192.605(b)(2) (192.465(b))	Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?	
275	(and 1 other asset)	Sat		TD.CPMONITOR	9.	TD.CPMONITOR.REVCURRENTTEST.P	192.605(b)(2) (192.465(c))	Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?	
276	(and 1 other asset)	Sat		TD.CPMONITOR	12	TD.CPMONITOR.DEFICIENCY.P	192.605(b)(2) (192.465(d))	Does the process require that the operator promptly correct any identified deficiencies in corrosion control?	
277	(and 1 other asset)	Sat		TD.CPMONITOR	14	TD.CPMONITOR.TESTSTATION.P	192.469	Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?	
278	(and 1 other asset)	Sat		TD.CPMONITOR	17	TD.CPMONITOR.TESTLEAD.P	192.605(b)(2) (192.471(a), 192.471(b), 192.471(c))	Does the process provide adequate instructions for the installation of test leads?	
279	(and 1 other asset)	Sat		TD.CPMONITOR	20	TD.CPMONITOR.INTFRCURRENT.P	192.605(b)(2) (192.473(a))	Does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system and does the process for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?	
280	(and 1 other asset)	Sat	(3)	TD.CPMONITOR	23	TD.CP.RECORDS.P	192.605(b)(2) (192.491(a), 192.491(b), 192.491(c))	Does the process include records requirements for the corrosion control activities listed in 192.491?	
281	(and 1 other asset)	Sat		TD.CP	1.	TD.CP.POST1971.P	192.605(b)(2) (192.455(a), 192.457(a), 192.452(a), 192.452(b))	Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
								external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?	
282	(and 1 other asset)	Sat		TD.CP	3.	TD.CP.PRE1971.P	192.605(b)(2) (192.457(b))	Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found?	
283	(and 1 other asset)	Sat		TD.CP	10	TD.CP.UNPROTECT.P	192.605(b)(2) (192.465(e))	Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?	
284	(and 1 other asset)	Sat		TD.CP	12	TD.CP.ELECSOLATE.P	192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))	Does the process give adequate guidance for electrically isolating 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?	
285	(and 1 other asset)	Sat		TD.CP	15	TD.CP.FAULTCURRENT.P	192.605(b)(2) (192.467(f))	Does the process give sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?	
286	(and 1 other asset)	Sat	(3)	TD.CP	20	TD.CP.RECORDS.P	192.605(b)(2) (192.491(a), 192.491(b), 192.491(c))	Does the process include records requirements for the corrosion control activities listed in 192.491?	
287	(and 1 other)	Sat		TD.COAT	1.	TD.COAT.NEWPIPE.P	192.605(b)(2) (192.455(a)(1), 192.461(a),	Does the process require that each buried or submerged pipeline installed after	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	asset)						192.461(b), 192.483(a))	July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?	
288	(and 1 other asset)	Sat		TD.COAT	4.	TD.COAT.NEWPIPEINSTALL.P	192.605(b)(2) (192.461(c), 192.461(d), 192.461(e), 192.483(a))	Does the process give adequate guidance for the application and inspection of protective coatings on pipe?	
289	(and 1 other asset)	Sat		TD.CPEXPOSED	1.	TD.CPEXPOSED.EXPOSEINSPECT.P	192.605(b)(2) (192.459)	Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination is required to determine the extent of the corrosion?	
290	(and 1 other asset)	Sat	(3)	TD.CPEXPOSED	8.	TD.CP.RECORDS.P	192.605(b)(2) (192.491(a), 192.491(b), 192.491(c))	Does the process include records requirements for the corrosion control activities listed in 192.491?	
291	(and 1 other asset)	Sat		TD.ICP	1.	TD.ICP.EXAMINE.P	192.605(b)(2) (192.475(a), 192.475(b))	Does the process direct personnel to examine removed pipe for evidence of internal corrosion?	
292	(and 1 other asset)	Sat		TD.ICP	4.	TD.ICP.EVALUATE.P	192.605(b)(2) (192.485(c))	Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?	
293	(and 1 other asset)	Sat		TD.ICP	6.	TD.ICP.REPAIR.P	192.491(c) (192.485(a), 192.485(b))	Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?	
294	(and 1 other asset)	Sat		TD.ICCG	1.	TD.ICCG.CORRGAS.P	192.605(b)(2) (192.475(a))	Does the process require that the corrosive effect of the gas in the pipeline be investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?	
295	(and 1 other asset)	Sat		TD.ICCG	3.	TD.ICCG.CORRGASACTION.P	192.605(b)(2) (192.477)	Does the process give adequate direction for actions to be taken if	

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

Row	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
	asset)							corrosive gas is being transported by pipeline?	
296	(and 1 other asset)	Sat		TD.SP	1.	TD.SP.CONDITIONS.P	190.341(d)(2)	Has a process been developed as necessary for complying with the special permit conditions?	
297	(and 1 other asset)	Sat		TD.SCC	1.	TD.SCC.SCCIM.P	192.911(c) (192.917(a)(1))	Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?	
298	(and 1 other asset)	Sat		TD.SCC	2.	TD.SCC.SCCIM.R	192.947(d) (192.917(a)(1))	Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?	
299	(and 1 other asset)	NA		TD.SCC	3.	TD.SCC.SCCREPAIR.R	192.709(a) (192.703(b))	Do records document that the operator has properly remediated any occurrences of SCC?	
300	(and 1 other asset)	Sat		TQ.QU	1.	TQ.QU.CORROSION.P	192.453 (192.805(b))	Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?	
301	(and 1 other asset)	Sat		TQ.QU	3.	TQ.QU.HOTTAPQUAL.P	192.627 (192.805(b))	Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?	
302	(and 1 other asset)	Sat		TQ.QU	6.	TQ.QU.EXCAVATE.P	192.805(b) (ADB-06-01, 192.801, 192.328)	Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?	
303	(and 1 other asset)	Sat		TQ.QUIM	1.	TQ.QUIM.IMREVIEWQUAL.P	192.915(a) (192.915(b), 192.915(c), 192.935(b))	Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?	

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

Row #	Assets	Result	(Note 1)	Sub-Group	Question #	Question ID	References	Question Text	Standard Issues
304	(and 1 other asset)	Sat		TQ.QUIM	2.	TQ.QUIM.IMREVIEWQUAL.R	192.947(e), 192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))	Do records indicate adequate qualification of integrity management personnel?	
305	(and 1 other asset)	Sat		TQ.QUIM	3.	TQ.QUIM.IMQC.P	192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))	Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?	
306	(and 1 other asset)	Sat		TQ.QUOMCONST	6.	TQ.QUOMCONST.WELDER.P	192.227(a), 192.225(a), 192.225(b), 192.328(a), 192.328(b), 192.805(b))	Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?	
307	(and 1 other asset)	NA		TQ.QUOMCONST	7.	TQ.QUOMCONST.WELDERLOWSTRESS.P	192.227(b), 192.225(a), 192.225(b), 192.805(b))	Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?	
308	(and 1 other asset)	Sat		TQ.TR	1.	TQ.TR.TRAINING.P	192.615(b)(2), 192.805(b))	Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?	
309	(and 1 other asset)	Sat		TQ.TR	4.	TQ.TR.TRAININGREVIEW.P	192.615(b)(3)	Does the process require review of emergency response personnel performance?	

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

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.

**** THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE PROCEDURES" MODULE IN THE MOST CURRENT WA-SPECIFIC GD QUESTION SET**

Inspector and Operator Information

Inspection ID 8089	Inspection Link 8089	Inspector - Lead Vinsel, Lex	Inspector - Assist
Operator BP NA	Unit Ferndale Gas	Records Location - City & State 	
Inspection Start Date 12-15-2020	Inspection Exit Interview Date 03-31-2021	Engineer Submit Date 04-09-2021	

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

8089 Inspection was an O&M inspection for Ferndale Gas. Form V is required for any gas O&M.

Gas Facilities were not available during Covid pandemic.

Summary of significant findings

Operator Contacts

Jim Bruen

Scott Flaterty

Instructions and Ratings Definitions

INSTRUCTIONS	INSPECTION RESULTS			
S - Satisfactory	Satisfactory Responses 32	Satisfactory List 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,23,26,27,28,29,30,31,32,34,35,36,	Unanswered Questions 1	Unanswered Questions List 37
U - Unsatisfactory	Unsatisfactory Responses 0	Unsatisfactory List		
Area Of Concern	Area of Concern Responses 0	Area of Concern List		
N/A- Not Applicable (does not apply to this operator or system)	Not Applicable Responses 4	Not Applicable List 22,24,25,33,		
N/C - Not	Not Checked	Not Checked / Evaluated List		

Checked/Evaluated / Evaluated
(was not inspected Responses
during this 0
inspection)

**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 "PROCEDURES: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.

INTRASTATE GAS OPERATOR PROCEDURES

MAPPING PROCEDURES

Question 1

Do procedures require accurate maps (or updates) of 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

P-191.17 - Annual Reports, Page 2, Section I (G) via NPMS annual submittals

Question 2

Do procedures require that NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) 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

P-191.17 - Annual Reports, Page 2, Section I (G) via NPMS annual submittals

REPORTING PROCEDURES

Question 3

Do procedures specify 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

Satisfactory

Q3 Notes

P-192.605(B)(3) - Maps & Records, Page 3, Sec III

Question 4

Do procedures require the submission of an annual report (Due March 15 for the preceeding calendar year) on construction defects and material failures that resulted in leaks?

Q4 Reference

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

Q4 Result

Satisfactory

Q4 Notes

P-191.17 - Annual Reports, Page 4, table

Question 5

Do procedures require the operator to submit 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

WAC 480-93-200(11)

Q5 Result

Satisfactory

Q5 Notes

P-191.15 - Reporting Incidents, Page 3, Section I (2)

Question 6

Do procedures require submission of a written report, within 5 days of completion of the failure analysis of any incident or hazardous condition due to construction defects or material failures?

Q6 Reference

WAC 480-93-200(6)

Q6 Result

Satisfactory

Q6 Notes

OMER Book I, Section 3 - Specifics, Page 10 (7)

Question 7

Do procedures describe the process for damage reporting requirements outlined in RCW 19.122.053(3) and WAC 480-93-200 (7), (8) and (9)?

Q7 Reference
RCW 19.122.053

Q7 Reference 2
WAC 480-93-200(7) (8) and (9)

Q7 Result
Satisfactory

Q7 Notes

P-192.614 - Damage Prevention Program, Page 7, Sec XII (C)

Question 8

Do procedures require that the operator file with the commission, not later than March 15 of each year, applicable to the preceding calendar year: copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety

Q8 Reference
WAC 480-93-200(10)

Q8 Result
Satisfactory

Q8 Notes

P-191.17 - Annual Reports, Page 2, Section I

DAMAGE PREVENTION PROCEDURES

Question 9

Are operator's locating and excavation procedures in compliance with all RCW 19.122 requirements for facility operators?

Q9 Reference
RCW 19.122

Q9 Result
Satisfactory

Q9 Notes

P-192.614 - Damage Prevention Program, Page 3-6, Section III-X

Question 10

Do the procedures require that the operator provide 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
RCW 19.122

Q10 Reference 2
WAC 480-93-200(8)

Q10 Result
Satisfactory

Q10 Notes

USPL-OPS-464-010 - Ground Disturbance Activity, Section 8.3.11 and Appendices VI

P-192.614 - Damage Prevention Program, Page 1 - Reference WAC 480-93-250 which points to RCW 19.122

Question 11

Do the procedures outline a process by which 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
RCW 19.122

Q11 Result
Satisfactory

Q11 Notes

USPL-OPS-464-010 - Ground Disturbance Activity Section 8.3.11 and Appendices VI Commission notified through Conflict Letter

P-192.614 - Damage Prevention Program, Page 1 - Reference WAC 480-93-250 which points to RCW 19.122

Question 12

Do procedures include the use of a quality assurance program for monitoring the locating and marking of facilities? Does the procedure require regular field audits of the performance of locators/contractors and implementing appropriate corrective action when necessary?

Q12 Reference
PHMSA State Program Question

Q12 Result
Satisfactory

Q12 Notes

USPL-OPS-465-010 - Line Locator Field Audit Assurance, Section 8

Question 13

Do procedures outline a process by which locator and excavator personnel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

Q13 Reference
WAC 480-93-013

Q13 Result
Satisfactory

Q13 Notes

USPL-OPS-465-010 - Line Locator Field Audit Assurance, Page 1, Section 1, Page 8, Appendices III

Question 14

Does the operator have sufficiently detailed directional drilling/boring procedures which include taking actions necessary to protect their facilities from dangers posed by drilling/other trenchless technologies?

Q14 Reference

PHMSA State Programs Emphasis

Q14 Result

Satisfactory

Q14 Notes

USPL-OPS 464-010 - Ground Disturbance Activity, a BP rep will be on site when ground disturbance is within 25' of pipeline centerline Page 8 Sec 8.3.6 (2)

Question 15

Does the operator have a sufficiently detailed procedure to review 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

PHMSA State Programs Emphasis

Q15 Result

Satisfactory

Q15 Notes

P-192.617 - Investigation of Incidents/Failures, Page 2 Sec II

DESIGN/CONSTRUCTION PROCEDURES

Question 16

Does the operator have sufficiently detailed procedures to ensure materials meet minimum requirements prescribed for the selection and qualification of pipe and components for use in all of their facilities, as described in Part 192, Subpart B? See 192.51, 192.55(Steel), 192.59(Plastic)

Q16 Reference

Part 192, Subpart B

Q16 Result

Satisfactory

Q16 Notes

USPL-GIS 36-413-1 - Specification for Line Pipe in Grades up to X70.

No Plastic in the pipeline system

Question 17

Does the operator have sufficiently detailed procedures to assure that they are meeting minimum requirements for design of their pipeline systems in accordance with Part 192, Subpart C? Are the procedures consistent with the requirements in parts 192.103, 192.105 for steel and parts 192.121 and 192.123 for plastic?

Q17 Reference

Part 192, Subpart C

Q17 Result

Satisfactory

Q17 Notes

USPL-GIS 36-413-1 - Specification for Line Pipe in Grades up to X70

No Plastic in the pipeline system

Question 18

Does the operator have sufficiently detailed procedures to ensure that 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?

Q18 Reference

WAC 480-93-160

Q18 Result

Satisfactory

Q18 Notes

P-191-22 - National Registry of Pipeline Operators Notification, Section I (A) 2 (b)

Question 19

Does the operator have a sufficiently detailed procedure that 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 the passage of instrumented internal inspection devices?

Q19 Reference

WAC 480-93-180

Q19 Result

Satisfactory

Q19 Notes

P-192.711 - Repairs, Replacements & Relocation, Page 5 Sec IV (A)

Question 20

Does the operator have sufficiently detailed procedures that account for all Part 192, Subpart D requirements for design of pipeline components?

Q20 Reference

Part 192, Subpart D

Q20 Result

Satisfactory

Q20 Notes

USPL-GIS 36-413-1 - Specification for Line Pipe in Grades up to X70

No Plastic in the pipeline system

Question 21

Does the operator's welding procedures account for all requirements specified in WAC 480-93-080 and all applicable Part 192, Subpart E requirements?

Q21 Reference

WAC 480-93-080

Q21 Reference 2

Part 192, Subpart E

Q21 Result

Satisfactory

Q21 Notes

P-192.225 - Welding, Page 2, Sec II

Question 22

Does the operator have a sufficiently detailed procedure that requires plastic pipe joiners to be re-qualified within 1 year/NTE 15months? Are procedures required to be located on site where plastic joining is performed? Does the procedure require plastic pipe joiners to re-qualify if no joints made during any 12 month period? Does the procedure specify the process the operator uses to track production joints or re-qualify joiners within the annual requirement?

Q22 Reference

WAC 480-93-080(2)

Q22 Result

Not Applicable

Q22 Notes

N/A - No PE pipe in pipeline system

Question 23

Does the operator have sufficiently detailed procedures to ensure compliance with construction requirements for transmission lines and mains in accordance with Part 192, Subpart G?

Q23 Reference

Part 192, Subpart G

Q23 Result

Satisfactory

Q23 Notes

OMER Book I, Section 3 - Specifics, Page 9 Additional Washington Reporting Requirements, (2)
 P-192.711 - Repairs, Replacements & Relocations, Page 20, Section XV
 USPL-GIS 43-0111 - Unloading, Hauling, and Stringing of Pipe, Page 4, Section 5
 P-192.711 - Repairs, Replacements & Relocations - Page 20, Sections VI, VIII, Exhibit RR-1
 USPL-GIS 36-417-1 - Specification for Carbon Steel Induction Bends for Pipelines
 USPL-GP 32-0200 - In-Line Inspection (ILI) Data Evaluation and Resulting Repair Program
 Procedures for ILI Repair Projects, Section 9.7
 P-192.319 - Excavation and Backfilling Procedure
 USPL-GP 04-0112 - Ditching & Excavation
 USPL-GIS 04-0114 - Lowering, Backfilling and Site Restoration
 USPL-GP 43-0117 - Specification for Road, Highway, & Railroad Crossings

Question 24

Does the operator have sufficiently detailed procedures to ensure protection of plastic pipe in accordance with WAC 480-93-178?

Q24 Reference

WAC 480-93-178

Q24 Result

Not Applicable

Q24 Notes

N/A - No PE pipe in pipeline system

Question 25

Does the operator's procedure ensure the siting, installation, testing and maintenance of service regulators is in compliance with WAC 480-93-140 and Part 192, Subpart H?

Q25 Reference

WAC 480-93-140

Q25 Reference 2

Part 192, Subpart H

Q25 Result

Not Applicable

Q25 Notes

N/A for the BP pipeline system

CORROSION CONTROL PROCEDURES

Question 26

Do the operator's cathodic protection procedures contain sufficient detail to explain how CP-related surveys, reads, and tests will be conducted in accordance with WAC 480-93-110? Do procedures include recording the condition of all underground metallic facilities each time the facility is exposed? Does the procedure require CP test reads on all exposed facilities where the coating has been removed?

Q26 Reference

WAC 480-93-110

Q26 Result

Satisfactory

Q26 Notes

P-192.453 - Corrosion Control, (Appendix A) Page 17
 P-192.711 - Repairs, Replacements & Relocations, Page 3, Sec III
 P-192.453 - Corrosion Control, Page 4, Sec IV

Question 27

Does the operator have a sufficiently detailed written program for monitoring atmospheric corrosion, with required timeframes for completing remedial action? Does the operator have a written program to monitor for indications of internal corrosion? Does the IC program contain remedial action requirements for areas where IC is detected?

Q27 Reference

WAC 480-93-110

Q27 Result

Satisfactory

Q27 Notes

P-192.453 - Corrosion Control, Page 12-13, Sec XIV
P-192.453 - Corrosion Control, Page 9-11, Sec XII, (4)(i)

Question 28

Do the operator's corrosion control procedures specify the testing intervals for casings (NTE 15 months), confirmatory follow-up on shorted casings within 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)?

Q28 Reference

WAC 480-93-110 (3) and (5)

Q28 Result

Satisfactory

Q28 Notes

P-192.453 - Corrosion Control, Page 7, Sec IX, A-1
P-192.453 - Corrosion Control, Page 19 Appendix A (F)
P-192.453 - Corrosion Control, Page 19, Appendix A (F)
P-192.453 - Corrosion Control, Page 17-18, Appendix A (B)

OPERATIONS & MAINTENANCE PROCEDURES

Question 29

Does the operator's procedure specify detailed gas leak investigation, evaluation, classification, and remedial action/repair prioritization steps in sufficient detail in order to ensure compliance with WACs 480-93-185, -186, and -18601?

Q29 Reference

WAC 480-93-185

Q29 Reference 2

WAC 480-93-186

Q29 Reference 3

WAC 480-93-18601

Q29 Result

Satisfactory

Q29 Notes

P-192.706 - Leakage Surveys, Page 2, Sec I and Page 5, Sec VI

Question 30

Does the operator have sufficiently detailed procedures for pressure testing and test records composition/retention requirements to ensure compliance with WAC 480-93-170 and Part 192 Subpart J?

Q30 Reference

WAC 480-93-170

Q30 Reference 2

Part 192 Subpart J

Q30 Result

Satisfactory

Q30 Notes

P-192.501 - Pressure Testing, Page 4-5 Sec VIII and Page 5 Section IX

Question 31

Do the operator's procedures contain sufficient detail to comply with the required entries for all gas leak records according to the criteria outlined in WAC 480-93-187(1-13)?

Q31 Reference

WAC 480-93-187

Q31 Result

Satisfactory

Q31 Notes

P-192.706 - Leakage Surveys, Page 8-9, Sec VIII (A)(2) Washington (i)

Question 32

Does the operator's leak survey procedure contain sufficient detail to assure compliance with instrumentation accuracy, survey intervals, records retention, and self-audits of the leak survey program as specified in WAC 480-93-188?

Q32 Reference

WAC 480-93-188

Q32 Result

Satisfactory

Q32 Notes

P-192.706 - Leakage Surveys, Page 2-3 Sec II (B)
P-192.706 - Leakage Surveys, Page 4-5, Sec IV

Question 33

Does the operator have sufficiently detailed procedures that detail service valve maintenance consistent with the requirements in WAC 480-93-100 and Part 192, Subpart M? Do the procedures prescribe service valve maintenance intervals of 1 per yr/ NTE 15months? Is the maintenance selection criteria consistent with WAC 480-93-100(2)(a-f)?

Q33 Reference

WAC 480-93-100

Q33 Reference 2

Part 192 Subpart M

Q33 Result

Not Applicable

Q33 Notes

N/A - No Service valves in the system

Question 34

Do the operators procedures specify detailed steps to comply with the proximity consideration requirement in WAC 480-93-020?

Q34 Reference

WAC 480-93-020

Q34 Result

Satisfactory

Q34 Notes

P-192.619 - Maximum Allowable Operating Pressure, Page 4, Sec II (B)

Question 35

Does the operator's OQ plan/procedure identify "New Construction" activities as covered tasks in accordance with WAC 480-93-013?

Q35 Reference

WAC 480-93-013

Q35 Result

Satisfactory

Q35 Notes

OQ Plan - Section (2), Item 1 page 5

Question 36

Do the operator's procedures specify use of odorant testing instrumentation, calibration, and applicable intervals in accordance with WAC 480-93-015? Does the procedure mandate retention of records of tests performed and equipment calibration for 5 years?

Q36 Reference

WAC 480-93-015

Q36 Result

Satisfactory

Q36 Notes

P-192.625 - Odorization of Gas, Page 2, Sec I

PROCEDURES: SUMMARY OF REQUIRED COMMENTS

PROCEDURE 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.

For Not Applicable

Q22 & Q24 - No PE pipe in system.

Q25 & Q33 - No services in system.

ADDITIONAL HEADER TEMPLATE

Question 37

Template for additional questions

Q37 Reference

WAC 480-75-330

Q37 Result**Q37 Notes**

Comments Template for additional comment boxes