

Utilities and Transportation Commission Standard Inspection Report for Intrastate Gas Distribution Systems Records Review and Field Inspection

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Docket Number	2622		
Inspector Name & Submit Date	Dennis Ritter, 10/23/2012		
Chief Eng Name & Review/Date	Joseph Subsits, 10/29/2012		
Operator Information			
Name of Operator:	AkzoNobel	OP ID #:	32358
Name of Unit(s):	AkzoNobel – Moses Lake		
Records Location:	2701 Road N NE, Moses Lake WA		
Date(s) of Last (unit) Inspection:	9/22/09	Inspection Date(s):	10/15-10/16/12

<p>Inspection Summary:</p> <p>The inspection was conducted on site at the Azko Nobel's facility in Moses Lake, WA from 10/16-10/17/12. A review of applicable design, construction, and O&M records was performed as well as field OQ and pipeline right of way inspection. The following probable violation was noted:</p> <ol style="list-style-type: none"> 1. 480-93-188(3)-the operator did not leak survey every month as required for unodorized systems. They surveyed twice per calendar year.

<p>HQ Address: Akzo Nobel 2701 Road "N" NE Moses Lake, WA</p>	<p>System/Unit Name & Address: Akzo Nobel 2701 Road "N" NE Moses Lake, WA</p>	
<p>Co. Official: Calvin Greene Phone No.: (509) 765-6400 Fax No.: (509) 765-5557 Emergency Phone No.: (509) 764-1500</p>	<p>Phone No.: (509) 765-6400 Fax No.: (509) 765-5557 Emergency Phone No.: (509) 764-1500</p>	
Persons Interviewed	Title	Phone No.
Robert Cosentino	President & CEO, Cosentino Consulting Inc.	360.200.4959
Lind Bingham	Manager HSE & Logistics	509-765-6400
Sandi Lybbert	HR Administrator	509-765-6400

<p>WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.</p> <p>(check one below and enter appropriate date)</p>			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	9/22/09

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GAS SYSTEM OPERATIONS			
Gas Supplier		Self	
Services: <i>Residential Commercial Industrial 1 Other</i>			
Number of reportable safety related conditions last year 0		Number of deferred leaks in system 0	
Number of <u>non-reportable</u> safety related conditions last year 0		Number of third party hits last year 0	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 0.0		Miles of main within inspection unit (total miles and miles in class 3 & 4 areas) 0.5 Total, 0.0 in class 3&4	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	n/a	n/a	n/a
Town:	n/a	n/a	n/a
Other:	15 psig	15	
Does the operator have any transmission pipelines?		This is the only pipeline	
Compressor stations? Use Attachment 1.		No (gas compression is accomplished via a production process which uses a compressor)	

Pipe Specifications:			
Year Installed (Range)	1995	Pipe Diameters (Range)	Single size, 8 inch
Material Type	HDPE PE3408	Line Pipe Specification Used	ASTM D1248-81 Resin type PE3408
Mileage	0.5	SMYS %	

Operator Qualification Field Validation
Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq Date Completed 10/29/2012

Integrity Management Field Validation
Important: Per PHMSA, IMP Field Verification Form (Rev 3, March 09) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at http://primis.phmsa.dot.gov/gasimp/home.gim Date Completed: N/A

PART 199 Drug and Alcohol Testing Regulations and Procedures		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection. Form 15	X			

REPORTING RECORDS		S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b) For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates. Full transmittal in July 15, 2011, no change email in 2012.	X			

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S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

REPORTING RECORDS			S	U	N/A	N/C
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? See appendix B of manual	X			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802 , or electronically at http://www.nrc.uscg.mil/nrchp.html , and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. No incidents since last inspection			X	
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov at unless an alternative reporting method is authorized IAW with paragraph (d) of this section. No incidents since last inspection			X	
5.	191.15(a)	30-day follow-up written reports to PHMSA (Form F7100.2) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov No incidents since last inspection			X	
6.	191.15(c)	Supplemental report (to 30-day follow-up) No incidents since last inspection			X	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2011 for the year 2010). Section 9.1.1	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov HTTPS://PORTAL.PHMSA.DOT.GOV	X			
9.	191.23	Filing the Safety Related Condition Report (SRCR) Section 9.1.2 No SRCRs since last inspection.			X	
10.	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery No SRCRs since last inspection.			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions Procedure P-5	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections No offshore pipelines			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports No navigable waterways			X	
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; No Incidents			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; No Incidents			X	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; No Incidents i			X	
18.	480-93-200(1)(d)	The unintentional ignition of gas; No Incidents			X	
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; only one customer			X	
20.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; No proximity considerations			X	
21.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; no incidents			X	
22.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; No incidents			X	
24.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; No incidents			X	
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or No incidents			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP No incidents			X	

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REPORTING RECORDS			S	U	N/A	N/C
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following No incidents				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; No incidents			X	
29.	480-93-200(4)(b)	The extent of injuries and damage No incidents			X	
30.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; No incidents			X	
31.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; No incidents			X	
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; No incidents			X	
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; No incidents			X	
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe No incidents i			X	
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; No incidents			X	
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; No incidents			X	
37.	480-93-200(4)(j)	Line type; No incidents			X	
38.	480-93-200(4)(k)	City and county of incident; No incidents			X	
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission. No incidents			X	
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted No incidents			X	
41.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure No incidents			X	
42.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar				
43.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety Section 9.2.4.a.i	X			
44.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
45.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; Section 9.2.4.a.ii	X			
46.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and No 3 rd party damage			X	
47.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: No 3 rd party damage (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other.			X	
48.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.	X			
49.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities Section 9.2.5.a	X			
50.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m No construction			X	

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REPORTING RECORDS			S	U	N/A	N/C
51.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required Have not been required by PHMSA to submit			X	

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
52.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator No excess flow valves			X	
53.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? No excess flow valves			X	
54.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? No excess flow valves			X	

Comments:

CONSTRUCTION RECORDS NO CONSTRUCTION			S	U	N/A	N/C
55.	480-93-013	OQ records for personnel performing New Construction covered tasks			X	
56.	192.225	Test Results to Qualify Welding Procedures			X	
57.	192.227	Welder Qualification			X	
58.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months)			X	
59.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)			X	
60.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period			X	
61.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)			X	
62.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
63.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains			X	
64.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
65.	192.241(a)	Visual Weld Inspector Training/Experience			X	
66.	192.243(b)(2)	Nondestructive Technician Qualification			X	
67.	192.243(c)	NDT procedures			X	
68.	192.243(f)	Total Number of Girth Welds			X	
69.	192.243(f)	Number of Welds Inspected by NDT			X	
70.	192.243(f)	Number of Welds Rejected			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
NO CONSTRUCTION						
71.	192.243(f)	Disposition of each Weld Rejected			X	
72.	.273/.283	Qualified Joining Procedures Including Test Results			X	
73.	192.303	Construction Specifications			X	
74.	192.325 WAC 480-93-178(4)(5)	Underground Clearances			X	
75.	192.327	Amount, location, cover of each size of pipe installed			X	
76.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines \geq 100 feet in length			X	
77.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items:			X	
78.	480-93-160(2)(a)	Description and purpose of the proposed pipeline;			X	
79.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route.			X	
80.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed			X	
81.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed;			X	
82.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route.			X	
83.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment			X	
84.	480-93-160(2)(g)	Welding specifications; and			X	
85.	480-93-160(2)(h)	Bending procedures to be followed if needed.			X	
86.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS ?			X	
87.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h)			X	
88.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed?			X	
89.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule)			X	
90.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines $>$ 60 psig			X	
91.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines \leq 60 psig			X	

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
92.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline Pipeline currently operates at 15 psi. Operator will increase MOP to 30 psi for process reasons. Appendix D of O&M gives MAOP calculations and design basis. 30 psi is well below calculated MAOP 51 psi and 45 psi hydro test.			X	
93.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years Appendix D	X			
94.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09 Page 3 of the manual	X			
95.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel Section 3.2.1	X			
96.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? No construction since last inspection			X	
97.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M Section 1.10	X			
98.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures section 8.4.3	X			
99.	192.609	Class Location Study (If applicable) no study			X	
100.	192.611	Confirmation or revision of MAOP no confirmation required			X	
101.		Damage Prevention (Operator Internal Performance Measures)				
102.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) Public r/w crossing is marked permanently			X	
103.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? Public r/w crossing is marked permanently			X	
104.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? Public r/w crossing is marked permanently.			X	
105.	192.614	Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? Public r/w crossing is marked permanently			X	
106.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. Section 5, Procedure P-1	X			
107.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Public r/w crossing is marked permanently			X	
108.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? OQ Records	X			
109.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) no follow up inspections 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys?			X	
110.		Informational purposes only. Not Required. Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do Y N X			X	

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Comments:	
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111.		Emergency Response Plans	S	U	N/A	N/C																										
112.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response no emergencies			X																											
113.	192.615(b)(1)	Location Specific Emergency Plan	X																													
114.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training Operator has an annual drill with after drill review and implementation. Also use neighboring incidents for drills.	X																													
115.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Operator has an annual drill with after drill review and implementation. Also use neighboring incidents for drills.	X																													
116.	192.615(c)	Liaison Program with Public Officials Local Emergency Planning Committee meets monthly. Fire, police and first responders get mailed AkzoNobel handbook.	X																													
117.	192.616	Public Awareness Program PA will be checked during PA inspection on 10/18/12 by Patti Johnson.																														
118.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:				X																										
119.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.																														
120.		API RP 1162 Baseline* Recommended Message Deliveries																														
121.		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Stakeholder Audience (LDC’s)</th> <th style="width: 50%; text-align: center;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residence Along Local Distribution System</td> <td>Annual</td> </tr> <tr> <td>LDC Customers</td> <td>Twice annually</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> <tr> <th style="text-align: center;">Stakeholder Audience (Transmission line operators)</th> <th style="text-align: center;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> <tr> <td>Residence Along Local Distribution System</td> <td>2 years</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> </tbody> </table>	Stakeholder Audience (LDC’s)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	Annual	LDC Customers	Twice annually	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual	Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	2 years	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual				
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122.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.				
123.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.				X
124.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 . .616(h)				X
125.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: No master meter (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information.			X	
126.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10) No accidents or failures since last inspection			X	

Comments:

127.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)	X			
128.	480-93-015(1)	Odorization of Gas – Concentrations adequate N/A If distribution must odorize, operator did not know this as last inspection they were transmission and did not need to odorize.			X	
129.	480-93-015(2)	Monthly Odorant Sniff Testing If distribution must odorize, operator did not know this as last inspection they were transmission and did not need to odorize.			X	
130.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements If distribution must odorize, operator did not know this as last inspection they were transmission and did not need to odorize.			X	
131.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) If distribution must odorize, operator did not know this as last inspection they were transmission and did not need to odorize.			X	
132.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) No bridges			X	
133.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days ? No markers missing			X	
134.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on no regulators			X	
135.	480-93-155(1)	Up-rating of system MAOP to >60 psig ? Procedures and specifications submitted 45 days prior? No uprating (MAOPO 15 psi)			X	
136.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? No leaks			X	
137.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; No leaks reported or found-- no other sources of Hydrogen			X	
138.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? ; No leaks reported or found-- no other sources of Hydrogen			X	

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139.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? No leaks			X	
140.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? No leaks			X	
141.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) No leaks			X	
142.	480-93-188(1)	Gas leak surveys	X			
143.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)			X	
144.	480-93-188(3)	Leak survey frequency (Refer to Table Below) Operator does 2X annual leak survey not monthly leak survey.		X		

Business Districts (implement by 6/02/07)	1/yr (15 months) N/A
High Occupancy Structures	1/yr (15 months) N/A
Pipelines Operating ≥ 250 psig	1/yr (15 months) N/A
Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months) Section 3.8.1

145.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs No special surveys			X	
146.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred No special surveys			X	
147.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected No special surveys			X	
148.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions No special surveys			X	
149.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in No special surveys			X	
150.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f) No records as did not do monthly surveys—did have records of bi-annual surveys.				X
151.	480-93-188(6)	Leak program - Self Audits no leak history as no leaks in pipeline.			X	
152.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 no transmission			X	

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

153.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) No transmission			X	
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Class Location	Required	Not Exceed
1 and 2	1/yr	15 months
3	2/yr	7½ months
4	4/yr	4½ months

154.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1) No mains where physical movement could occur			X	
155.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)) No mains where physical movement could occur			X	
156.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1)			X	
157.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> • Outside Business District (5 years) No business districts • Cathodically unprotected distribution lines (3 years) No Steel pipe 			X	

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158.	192.603(b)	Tests for Reinstating Service Lines 192.725 no service lines			X	
159.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 no abandoned pipelines			X	
160.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 no regulator stations			X	
161.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 739 no transmission			X	
162.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 no transmission			X	
163.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 N/A	X			
164.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) no service valves			X	
165.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 no transmission			X	
166.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 no hot work permits			X	
167.	192.603(b)	Welding – Procedure 192.225(b) No welding			X	
168.	192.603(b)	Welding – Welder Qualification 192.227/.229 No welding			X	
169.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) No welding			X	
170.	192.709	NDT Records (pipeline life) .243(f) no transmission			X	
171.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) no transmission			X	
172.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) no transmission			X	

Comments:
192.709 transmission

CORROSION CONTROL RECORDS			S	U	N/A	N/C
173.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) plastic pipeline			X	
174.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) plastic pipeline			X	
175.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) plastic pipeline			X	
176.	192.491	Test Lead Maintenance .471 plastic pipeline			X	
177.	192.491	Maps or Records .491(a) plastic pipeline			X	
178.	192.491	Examination of Buried Pipe when exposed .459 plastic pipeline A			X	
179.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed plastic pipeline			X	
180.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) plastic pipeline			X	
181.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) plastic pipeline			X	
182.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) plastic pipeline			X	
183.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) plastic pipeline			X	
184.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) plastic pipeline			X	
185.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation plastic pipeline			X	

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
186.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e plastic pipeline			X	
187.	192.491	Electrical Isolation (Including Casings) .467 plastic pipeline			X	
188.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months plastic pipeline			X	
189.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods plastic pipeline			X	
190.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days plastic pipeline			X	
191.	480-93-110(5)(c)	Casing shorts cleared when practical plastic pipeline			X	
192.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months plastic pipeline`			X	
193.	192.491	Interference Currents .473 plastic pipeline			X	
194.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a plastic pipeline			X	
195.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) plastic pipeline			X	
196.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 plastic pipeline			X	
197.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Valve operator is metallic--part of valve maintenance.	X			
198.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 plastic pipeline			X	

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
199.	192.161	Supports and anchors no supports on regulated pipeline			X	
200.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? No welding			X	
201.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables No welding			X	
202.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? No construction			X	
203.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. No construction			X	
204.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified? N/A			X	
205.	480-93-015(1)	Odorization No odorization—gas is used in specific ratio with two other feedstock fuels in customer boiler. Using odorant would interfere with ratio as well as introduce sulfur into stack emissions. Also, hydrogen is so much lighter than odorant and a smaller, mixing is very difficult.			X	
206.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
207.	192.179	Valve Protection from Tampering or Damage All valves inside plant fence	X			
208.	192.455	Pipeline coatings meet requirements of 192.461 (<i>for buried pipelines installed after 7/31/71</i>) No construction			X	
209.	192.463	Levels of cathodic protection plastic pipeline			X	
210.	192.465	Rectifiers plastic pipeline			X	
211.	192.467	CP - Electrical Isolation plastic pipeline			X	

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
212.	192.476	Systems designed to reduce internal corrosion plastic pipeline			X	
213.	192.479	Pipeline Components exposed to the atmosphere Valve	X			
214.	192.481	Atmospheric Corrosion: monitoring Section 4, form F-10	X			
215.	192.491	Test Stations – Sufficient Number .469 plastic pipeline			X	
216.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992) plastic pipeline			X	
217.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed? No construction			X	
218.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? No service lines			X	
219.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted Yes	X			
220.	192.605	Knowledge of Operating Personnel	X			
221.	480-93-124	Pipeline markers	X			
222.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? No markers missing or replaced			X	
223.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) None			X	
224.	192.195	Overpressure protection designed and installed where required? None required			X	
225.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities) no regulators			X	
226.	192.741	Telemetry, Recording Gauges No Control Room			X	
227.	192.751	Warning Signs No warning signs (markers only)			X	
228.	192.355	Customer meters and regulators. Protection from damage no meters			X	
229.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. No vaults			X	
230.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? No regulators			X	
231.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) None			X	
232.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards. No construction			X	
233.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards No construction			X	
234.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No X				
235.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?			X	
236.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?			X	
237.	192.745	Valve Maintenance (Transmission) no transmission			X	
238.	192.747	Valve Maintenance (Distribution) valves do not require maintenance for lubrication	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
valves		AkzoNobel/Simplot
Right of way		AkzoNobel/Simplot
markers		AkzoNobel/Simplot
Process control room (non regulated)		AkzoNobel

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Comments: AkzoNobel’s control room does not operate the pipeline. It is for process control of plant and also controls compressor which pressurizes hydrogen for processes. The set points for pressure control are on SCADA system in control room. Looked at set points to ensure MAOP is met.

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

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe
ADB-10-04	April 29, 2010	Pipeline Safety: Implementation of Electronic Filing for Recently Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-05	June 28, 2010	Pipeline Safety: Updating Facility Response Plans in Light of Deepwater Horizon Oil Spill
ADB-10-06	August 3, 2010	Pipeline Safety: Personal Electronic Device Related Distractions
ADB-10-07	August 31, 2010	Liquefied Natural Gas Facilities: Obtaining Approval of Alternative Vapor-Gas Dispersion Models
ADB-10-08	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications

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ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

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

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
		No Compressor station				
239.	.605(b)					
240.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			x	
241.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			x	
242.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			x	
243.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			x	
244.		(b) Tank must be protected according to NFPA #30			x	
245.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			x	
246.		• 50% of the upright side areas are permanently open, or			x	
247.		• It is an unattended field compressor station of 1000 hp or less			x	

Comments:

			COMPRESSOR STATION O&M PERFORMANCE AND RECORDS	S	U	N/A	N/C
			No Compressor station				
248.	.709	.731(a) Compressor Station Relief Devices (1 per yr/15 months)			x		
249.		.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)			x		
250.		.736(c) Compressor Stations – Detection and Alarms (Performance Test)			x		

Comments:

			COMPRESSOR STATIONS INSPECTION (Field)	S	U	N/A	N/C
			No Compressor station				
			(Note: Facilities may be “Grandfathered”)				
251.	.163	(c) Main operating floor must have (at least) two (2) separate and unobstructed exits			x		
252.		Door latch must open from inside without a key			x		
253.		Doors must swing outward			x		
254.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			x		
255.		Each gate located within 200 ft of any compressor plant building must open outward			x		
256.		When occupied, the door must be opened from the inside without a key			x		

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
No Compressor station (Note: Facilities may be “Grandfathered”)						
257.	(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			x	
258.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors?			x	
259.	(b)	Do the liquid separators have a manual means of removing liquids?			x	
260.		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			x	
261.	.167 (a)	ESD system must:				
262.		- Discharge blowdown gas to a safe location			x	
263.		- Block and blow down the gas in the station			x	
264.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x	
265.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			x	
266.		ESD system must be operable from at least two locations, each of which is:				
267.	.167	- Outside the gas area of the station			x	
268.		- Not more than 500 feet from the limits of the station			x	
269.		- ESD switches near emergency exits?			x	
270.	(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			x	
271.	(c)	Are ESDs on platforms designed to actuate automatically by...				
272.		- For unattended compressor stations, when:				
273.		▪ The gas pressure equals MAOP plus 15%?			x	
274.		▪ An uncontrolled fire occurs on the platform?			x	
275.		- For compressor station in a building, when				
276.		▪ An uncontrolled fire occurs in the building?			x	
277.		▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?			x	
278.	.171 (a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			x	
279.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			x	
280.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			x	
281.	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			x	
282.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			x	
283.	.173	Is each compressor station building adequately ventilated?			x	
284.	.457	Is all buried piping cathodically protected?			x	
285.	.481	Atmospheric corrosion of aboveground facilities			x	
286.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			x	
287.		Are facility maps current/up-to-date?			x	
288.	.615	Emergency Plan for the station on site?			x	
289.	.619	Review pressure recording charts and/or SCADA			x	

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
No Compressor station (Note: Facilities may be “Grandfathered”)						
290.	.707	Markers			x	
291.	.731	Overpressure protection – relief’s or shutdowns			x	
292.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			x	
293.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			x	
294.	.736	Gas detection – location			x	

Comments: