

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			
Inspection ID/Docket Number	2655		
Inspector Name & Submit Date	Dennis Ritter, 5/23/2013		
Chief Eng Name & Review/Date	Joe Subsits, 5/24/2013		
Operator Information			
Name of Operator:	Cascade Natural Gas Corporation	OP ID #:	2128
Name of Unit(s):	Bellingham		
Records Location:	Bellingham and Kennewick, WA		
Date(s) of Last (unit) Inspection:	April 4-6, 12-14, 18-21 and 26, 2011	Inspection Date(s):	May 13-16, 2013

Inspection Summary:

The 2013 Standard Inspection for CNG Bellingham District was conducted in Whatcom County at the CNG Shop and locations as noted in the inspection form. Records were reviewed at CNG's shop as well as at WUTC's office prior to field visit. Field and OQ assessments were conducted as follows: CP pipe to soil, critical bond and rectifier inspection; r/w patrols; pressure regulator and relief lock-up ; block valve operation; odorant level check; odorant pump check; odorant concentration in gas test with odorometer; casing read.

The following issues were noted during the inspection:

97) 49 CFR 192.517(a) Pressure Testing (operates at or above 100 psig) – **useful life of pipeline** CNG could not locate the pressure test record document for Line 1--8" Bellingham HP constructed in 1957 pre-code. CNG found several documents referring to a pressure test, but not the actual record of the test (see MAOP item below). **This issue will be included part of NOPV for MAOP records.**

131) 49 CFR 192.619 Maximum Allowable Operating Pressure (MAOP)

CNG CP 604 states CNG will meet part 192.619 for system operation. However, CNG at the time of the inspection could not produce supporting MAOP documents for Line 1--8" HP pressure line in Bellingham. This line was installed in 1957. CNG produced two documents, one undated which did note a pressure test of 500 psi. The other was a 1970 letter to Lee Johnson & Associates which has similar information. These documents **do not** provide a definitive answer supporting the current MAOP of 380 psi.

122) 49 CFR 192.616(e&f) **This was also noted in the Longview CNG 2013 inspection and will be rectified when new PA plan is implemented later in 2013.** CNG identified, "Affected public-non customers" as a stakeholder audience but did not send them targeted information as required. As noted in the 2012 PA Plan effectiveness review, they failed to use targeted brochures, pamphlets etc. to inform this group. Instead, they used TV, radio etc. **CNG is revising the PAP plan to address this and other deficiencies. PAP follow up inspection is scheduled for Aug. 2013.**

137) WAC 480-93-124(4) Markers reported missing or damaged replaced within **45 days?** According to V. Ganow, Bellingham district employees were unaware of 45-d requirement to replace markers. CNG held a special training so all OQ qualified personnel are now aware. Prior to 2011, markers were not on mapping system. With new GIS system , they are now mapped. **This issue is also part of Docket PG-110443 (9th Cause of Action-Records) and is being remedied in that venue for all CNG districts.**

160) 49 CFR 192 .723(b)(1)&(2) Leakage Survey - Outside Business District (**5 years**) District 6 Bellingham-CNG did not perform the 5 year survey as required by CP 715 and 192.723 in 2011. When discovered (after previous district manager departed) CNG immediately surveyed but this occurred in 2012. See CNG memo. **As already remedied, no further action.**

215) 49 CFR 192 192.467 Electrical Isolation--During the field inspection of the Sumas Gate station, CNG personnel noted that they cannot check isolation between CNG and Spectra piping as this would require a border crossing to check. CNG corrosion personnel are aware of this and are working on a solution. **Area of concern CNG needs to respond to.**

225) WAC 480-93-124 Pipeline markers During pre-inspection field reconnaissance it was noted that at several locations-Sumas Ave. at Johnson Creek, Double Ditch Rd at Main St. in Lynden and E. Badger Rd at Fishtap Creek-- CNG markers were not present. When asked about these locations, CNG sent personnel out to evaluate and it was determined that markers were needed. CNG generated work-orders and had these installed before end of inspection. However, it brings up the question as to how many more water crossings might need markers. **Area of concern that CNG needs to respond to.**

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

HQ Address: Cascade Natural Gas Corporation 8113 W. Grandridge Blvd Kennewick WA 99336		System/Unit Name & Address: Cascade Natural Gas Corporation 1910 Racine Street Bellingham WA 98229-4707	
Co. Official:	Eric Martuscelli	Phone No.:	(360)788-2381
Phone No.:	(509) 572-0294	Fax No.:	(360) 733-1416
Fax No.:	(208) 377-6097	Emergency Phone No.:	1-888-522-1130
Emergency Phone No.:	1-888-522-1130		
Persons Interviewed		Title	
Phone No.			
Tina Beach	Manager, Standards & Compliance	(509) 734-4576	
Patti Chartrey	Pipeline Safety Specialist	(360) 405-4231	
Vicki Ganow	Pipeline Safety Specialist	(360) 788-2381	
Kevin McCallum	Pipeline Safety Specialist	(509)-572-5960	
Greg Nelson	District Operations Manager	(360) 788-2370	
Kathy Bergner	District Manager	(360) 788-2345	

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. (check one below and enter appropriate date)			
<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.) <u>Lex Vinsel, WA UTC</u>	Date:	October 16-18 and 23, 2012

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

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.

GAS SYSTEM OPERATIONS			
Gas Supplier	Williams & Spectra Energy		
Services:	Residential 40,823 Commercial 4,836 Industrial 56 Other		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	5
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	22
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	47.3014	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)	855.8617
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:			
Town:	Bellingham O-7 Acme O-6 Bellingham O-8 Deming O-5 Lawrence O-4 Nooksack O-3 Sumas O-9	145 150 380 150 150 250 780	362 644
Other:			
Does the operator have any transmission pipelines?	Yes (not part of this inspection)		
Compressor stations? Use Attachment 1.	None in this district		

Pipe Specifications:			
Year Installed (Range)	1952 to present	Pipe Diameters (Range)	½" TO 20"
Material Type	Steel and PE	Line Pipe Specification Used	API, 5L, 3408 PE, 2406 MDPE, X42, X46, X52
Mileage	Transmission 47.3014 Main 855.8617 Service 627.6576	SMYS %	Line 1--8" Bellingham HP--17.82% Line 2--Bellingham HP Dist.--7.8%, 10.16%, 10.87% Line 3--8" Central Whatcom HP--18.92%,17.82% Line 4--4" South Lynden--8.55%, 7.12% Line 5--4" South Everson--8.55% Line 6--4" Ferndale HP--18.19% Line 8--2" Nooksack HP Dist--5.51% Line 12--4" North Lynden HP--13.68% Line 14--4" Blain HP--8.55 Line 15--4" South Sumas HP--5.81% Line 17--10" Squalicum HP--17.76%

Operator Qualification Field Validation

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

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.

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 4, May 2007) 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>

Integrity Management Field Validation

Important: Per PHMSA, IMP Field Verification Form (Rev 6/18/2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <http://primis.phmsa.dot.gov/gasimp/home.gim> **Date Completed/Uploaded:** N/A NO TRANSMISSION

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

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. March 12, 2013	X			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? March 12, 2013	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.	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.	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 30-d follow up reports			X	
6.	191.15(c)	Supplemental report (to 30-day follow-up) No supplemental reports			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: <i>June 15, 2011 for the year 2010</i>).	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	X			
9.	191.23	Filing the Safety Related Condition Report (SRCR) No SRCR's			X	

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

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
10.	191.25 49 U.S.C. 60139, Subsection (b)(2)	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery. NO SRCRs Note: Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA on or before the fifth day following the date on which the exceedance occurs. The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <ul style="list-style-type: none"> • The name and principal address of the operator date of the report, name, job title, and business telephone number of the person submitting the report. • The name, job title, and business telephone number of the person who determined the condition exists. • The date the condition was discovered and the date the condition was first determined to exist. • The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored. • The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action. 			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections No offshore facilities			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports No abandoned facilities			X	
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; No fatalities			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; No property damage meeting threshold			X	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas;	X			
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;2/17/12 CNG reported several customers (<25) out of gas due to supply issues associated with unusually cold weather. Have procedure in emergency plan.	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 exceedance meeting threshold			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;	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;	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 occurrences			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 low pressure systems			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	X			
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	X			

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

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
29.	480-93-200(4)(b)	The extent of injuries and damage;	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;	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;	X			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	X			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			
37.	480-93-200(4)(j)	Line type;	X			
38.	480-93-200(4)(k)	City and county of incident; and	X			
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted No supplemental reports			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 written failure analyses			X	
42.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form)				
43.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)	X			
44.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed?	X			
45.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? Note: Records maintained for two years and made available to the commission upon request.	X			
46.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
47.	480-93-200(8)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 	X			
48.	480-93-200(8)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 	X			
49.	480-93-200(8)(c)	<ul style="list-style-type: none"> 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. 	X			
50.	480-93-200(9)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...No occurrences <ul style="list-style-type: none"> An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a) A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) 			X	
51.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
52.	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
53.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.	X			

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

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
54.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
57.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator	X			
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
59.	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?	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
60.	480-93-013	OQ records for personnel performing New Construction covered tasks	X			
61.	192.225	Test Results to Qualify Welding Procedures	X			
62.	192.227	Welder Qualification	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) CNG does not use Appx C welders			X	
64.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	X			
65.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	X			
66.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)	X			
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992	X			
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains No new casings or conduits for mains since last inspection.			X	
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
70.	192.241(a)	Visual Weld Inspector Training/Experience	X			
71.	192.243(b)(2)	Nondestructive Technician Qualification <i>Badger/Depot Rd. Project 196866-Pipe is AND Project 177227 HP 4" Ferndale 4"<6" per 192.241 no NDT</i>	X			
72.	192.243(c)	NDT procedures <i>CNG CP 760 is being revised to account for web based documents</i>	X			
73.	192.243(f)	Total Number of Girth Welds <i>Two total on 8" #177227</i>	X			
74.	192.243(f)	Number of Welds Inspected by NDT <i>100% for 8" #177227</i>	X			

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

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.

CONSTRUCTION RECORDS			S	U	N/A	N/C
75.	192.243(f)	Number of Welds Rejected None			X	
76.	192.243(f)	Disposition of each Weld Rejected None			X	
77.	.273/.283	Qualified Joining Procedures Including Test Results	X			
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
80.	192.327	Amount, location, cover of each size of pipe installed	X			
81.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines \geq 100 feet in length No Transmission			X	
82.	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: No Transmission			X	
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; No Transmission			X	
84.	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. No Transmission			X	
85.	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 No Transmission			X	
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; No Transmission			X	
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. No Transmission			X	
88.	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; No Transmission			X	
89.	480-93-160(2)(g)	Welding specifications; and No Transmission			X	
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. No Transmission			X	
91.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS ? No occurrences			X	
92.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h)	X			
93.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed?	X			
94.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule)	X			
95.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines $>$ 60 psig No occurrences			X	
96.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines \leq 60 psig No occurrences			X	

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
97.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline Could not find records pre-code pipeline 1957--See MAOP No. 131 below.	X			
98.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	X			

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

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.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
99.	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	X			
100.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	X			
101.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? <i>Project #177227 AND 195329.</i>	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures <i>Use CNG Construction Inspection Checklist for this. OK.</i>	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures No Transmission			X	
104.	192.609	Class Location Study (If applicable) No change since last inspection--all pipelines <20%SMYS			X	
105.	192.611	Confirmation or revision of MAOP No change since last inspection—no need to confirm			X	
106.	192.614	Damage Prevention (Operator Internal Performance Measures)				
107.		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) This is being developed and implemented as part of PG-130309				X
108.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? CNG does not contract locating			X	
109.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? CNG does not contract locating			X	
110.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
111.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
112.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
113.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements?	X			
114.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) No Occurrences 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	

Comments:

115.		Emergency Response Plans	S	U	N/A	N/C
116.	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	X			
117.	192.615(b)(1)	Location Specific Emergency Plan KUDO on plan.	X			

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

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.

118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training <i>Ref CNG 234 which is discussed at Safety Meetings following incident.</i>	X																													
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. <i>Ref CNG 234 which is discussed at Safety Meetings following incident.</i>	X																													
120.	192.615(c)	Liaison Program with Public Officials	X																													
121.	192.616	Public Awareness Program																														
122.	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 NOTE: CNG is revising their PA program based on previous inspections. The new program will be rolled out in 2013. Affected public-non customers as identified in PA plan not identified specifically. Used TV, radio etc. Patti J. identified this as part of PA effectiveness evaluation in 2012.	X																													
123.		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.																														
124.		API RP 1162 Baseline* Recommended Message Deliveries																														
125.		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Stakeholder Audience (LDC’s)</th> <th style="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				
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																															
126.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																														
127.	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																													
128.	.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. For operators in existence on June 20, 2005 , 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																													
129.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: No master meters (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																											
130.	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)	X																													

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

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.

Comments:

131.	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) CNG CP 604 states CNG will meet part 192.619 for system operation. Asked about 8" HP pressure line in Bellingham and supporting MAOP documents. Line was installed in 1957. CNG produced two documents, one undated which has limited information and the other a 1971 letter to Lee Johnson & Associates which has similar information. These documents do not provide a definitive answer supporting the current MAOP of 380 psi.		X		
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements No Occurrences			X	
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
136.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) Completed as part of quarterly patrols. Checked patrol records 2011, 2012.	X			
137.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? According to V. Ganow, Bellingham district employees were unaware of 45-d requirement to replace markers. Had special training. Prior to 2011, markers were not on mapping system. With new GIS system, they are now maps.	X			
138.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on	X			
139.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? No uprating			X	
140.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	X			
141.	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 Occurrences			X	
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? No Occurrences			X	
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair?	X			
144.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? 5 deferred leaks one downgraded from 2 to 3 once.	X			
145.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X			
146.	480-93-188(1)	Gas leak surveys	X			
147.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X			
148.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

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

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

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.

149.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs	X															
150.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred	X															
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected No Occurrences			X													
152.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions <i>Lightning Strike at Sehome HS</i>	X															
153.	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	X															
154.	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) <i>Checked back 5 years.</i>	X															
155.	480-93-188(6)	Leak program - Self Audits <i>Dec 23, 2011 CNG Corp Leak Survey Assessment</i>	X															
156.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705			X													
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table>							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)
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)																
157.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706			X													
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr	7½ months																
4	4/yr	4½ months																
158.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1)	X															
159.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) <i>Part of annual patrol</i>	X															
160.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) (2) District 6 Bellingham-CNG did not perform the 5 year survey as required by CP 715 and 192.723. CNG found this and corrected immediately prior to inspection. See CNG memo.	X															
161.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> • Outside Business District (5 years) • Cathodically unprotected distribution lines (3 years) 	X															
162.	192.603(b)	Tests for Reinstating Service Lines 192.725	X															
163.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 <i>No abandoned pipelines</i>			X													
164.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X															
165.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X															
166.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 <i>No Transmission</i>			X													
167.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	X															
168.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X															
169.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749	X															
170.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 <i>No hot work permits</i>			X													
171.	192.603(b)	Welding – Procedure 192.225(b)	X															
172.	192.603(b)	Welding – Welder Qualification 192.227/.229	X															
173.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2)	X															
174.	192.709	NDT Records (pipeline life) .243(f) <i>No Transmission</i>			X													
175.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) <i>No Transmission</i>			X													

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

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.

176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area’s (HCA’s) No Transmission					X	
------	------------	---	--	--	--	--	---	--

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
177.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) Badger Depot Rd 4” HP #196866 FBE coated 4”	X			
178.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) Badger Depot Rd 4” HP #196866 FBE coated 4”	X			
179.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	X			
180.	192.491	Test Lead Maintenance .471	X			
181.	192.491	Maps or Records .491(a)	X			
182.	192.491	Examination of Buried Pipe when exposed .459	X			
183.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
184.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X			
185.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	X			
186.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) Kickerville Rd at Henry BP Test Sta C18	X			
187.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) R28	X			
188.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
189.	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.	X			
190.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) No unprotected pipe.				X
191.	192.491	Electrical Isolation (Including Casings) .467		X		
192.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
193.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods Tinker Rasor CP 755.	X			
194.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days	X			
195.	480-93-110(5)(c)	Casing shorts cleared when practical No cleared casings				X
196.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months	X			
197.	192.491	Interference Currents .473	X			
198.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) No corrosion or corrosive gas				X
199.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) Badger Depot Rd 4” HP #196866 FBE coated 4”	X			
200.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 No corrosion or corrosive gas				X
201.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Checked Bellingham 6, Blain, and Deming	X			

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

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.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	X			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
203.	192.161	Supports and anchors	X			
204.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? <i>No welding observed</i>			X	
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables <i>No welding observed</i>			X	
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? <i>No joining observed</i>			X	
207.	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.	X			
208.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified?	X			
209.	480-93-015(1)	Odorization	X			
210.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
211.	192.179	Valve Protection from Tampering or Damage	X			
212.	192.455	Pipeline coatings meet requirements of 192.461 <i>(for buried pipelines installed after 7/31/71)</i>	X			
213.	192.463	Levels of cathodic protection	X			
214.	192.465	Rectifiers	X			
215.	192.467	CP - <i>Electrical Isolation Sumas gate station could not be measure isolation due to border issues but CNG is looking into a solution.</i>		X		
216.	192.476	Systems designed to reduce internal corrosion <i>No historical instances of internal corrosion in Washington State; CNG not aware of any internal corrosion issues.</i>			X	
217.	192.479	Pipeline Components exposed to the atmosphere	X			
218.	192.481	Atmospheric Corrosion: monitoring	X			
219.	192.491	Test Stations – Sufficient Number .469	X			
220.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
221.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed? <i>None observed</i>			X	
222.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? <i>None observed</i>			X	
223.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
224.	192.605	Knowledge of Operating Personnel	X			
225.	480-93-124	<i>Pipeline markers Does CNG use markers at water crossings with buried pipe? Sumas at Johnson Creek no markers on both sides of creek. CNG generated work orders and will have these installed before end of inspection. Other areas?</i>		X		
226.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
227.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) <i>None</i>			X	
228.	192.195	Overpressure protection designed and installed where required?	X			
229.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			

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

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.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
230.	192.741	Telemetry, Recording Gauges	X			
231.	192.751	Warning Signs	X			
232.	192.355	Customer meters and regulators. Protection from damage	X			
233.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. <i>None observed</i>			X	
234.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
235.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) <i>CNG's policy is to remove all pipe more than 2 years old from inventory. Pipe in yard dated 2012 and 2013</i>	X			
236.	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.	X			
237.	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	X			
238.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No X				
239.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?			X	
240.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?			X	
241.	192.745	Valve Maintenance (Transmission) <i>No Transmission</i>			X	
242.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
Odorizer	O-9	Sumas, WA- Border station
Regulator Station	R-125	Lynden WA
Rectifier	GB14	Line 16 N. Whatcom HP Line, Lynden WA
Critical Bond	C18	Kickerville Rd at Henry Rd. Ferndale WA
Regulator Station	R-138	Bakerview Valley Rd at 8" Bellingham HP, Bellingham WA
Block Valve	V-152	James St., Bellingham WA
Casing	N/a	James St at Squalicum Creek Bellingham WA
Distribution Main (construction)	N/a	1315 W. Connecticut St Bellingham
Regulator Station (sniff test)	R-148	Cornwall at Pine St. Bellingham WA

Comments:

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

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.

Comments:

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

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB-12-05	Mar 23, 12	Cast Iron Pipe (Supplementary Advisory Bulletin)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.
ADB-11-03	May 17, 11	National Pipeline Mapping System Data Submissions and Submission Dates for Gas Transmission and Gathering Systems and Liquefied Natural Gas Annual Reports

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
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

243.	.605(b)	COMPRESSOR STATION PROCEDURES No Compressor stations in this unit	S	U	N/A	N/C
244.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service				
245.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units				
246.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement				
247.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings				
248.		(b) Tank must be protected according to NFPA #30				
249.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:				
250.		<ul style="list-style-type: none"> • 50% of the upright side areas are permanently open, or 				
251.		<ul style="list-style-type: none"> • It is an unattended field compressor station of 1000 hp or less 				

Comments:

COMPRESSOR STATION O&M PERFORMANCE AND RECORDS			S	U	N/A	N/C
252.	.709	.731(a) Compressor Station Relief Devices (1 per yr/15 months)				
253.		.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)				
254.		.736(c) Compressor Stations – Detection and Alarms (Performance Test)				

Comments:

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
255.	.163	(c) Main operating floor must have (at least) two (2) separate and unobstructed exits				
256.		Door latch must open from inside without a key				
257.		Doors must swing outward				
258.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit				
259.		Each gate located within 200 ft of any compressor plant building must open outward				
260.		When occupied, the door must be opened from the inside without a key				
261.		(e) Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?				
262.	.165	(a) If applicable, are there liquid separator(s) on the intake to the compressors?				
263.		(b) Do the liquid separators have a manual means of removing liquids?				

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
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
264.		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?				
265.	.167	(a) ESD system must:				
266.		- Discharge blowdown gas to a safe location				
267.		- Block and blow down the gas in the station				
268.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers				
269.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage				
270.		ESD system must be operable from at least two locations, each of which is:				
271.	.167	- Outside the gas area of the station				
272.		- Not more than 500 feet from the limits of the station				
273.		- ESD switches near emergency exits?				
274.		(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?				
275.		(c) Are ESDs on platforms designed to actuate automatically by...				
276.		- For unattended compressor stations, when:				
277.		▪ The gas pressure equals MAOP plus 15%?				
278.		▪ An uncontrolled fire occurs on the platform?				
279.		- For compressor station in a building, when				
280.		▪ An uncontrolled fire occurs in the building?				
281.		▪ 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)?				
282.	.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.				
283.		(b) Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?				
284.		(c) Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?				
285.		(d) Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?				
286.		(e) Are the mufflers equipped with vents to vent any trapped gas?				
287.	.173	Is each compressor station building adequately ventilated?				
288.	.457	Is all buried piping cathodically protected?				
289.	.481	Atmospheric corrosion of aboveground facilities				
290.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?				
291.		Are facility maps current/up-to-date?				
292.	.615	Emergency Plan for the station on site?				
293.	.619	Review pressure recording charts and/or SCADA				
294.	.707	Markers				
295.	.731	Overpressure protection – relief’s or shutdowns				
296.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?				

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
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
297.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?				
298.	.736	Gas detection – location				

Comments: