

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid 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.

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

Inspection Report			
Inspection ID/ Docket Number	6187		
Inspector Name & Submit Date	Dennis Ritter		
Chief Engineer Name & Review Date	Joe Subsits 10/7/2015		
Operator Information			
Name of Operator:	AltaGas Facilities (US) Inc	OPID #:	31758
Name of Unit(s):	Ferndale Terminal		
Records Location:	Ferndale Terminal, Ferndale WA		
Date(s) of Last Review:	May 7-9, 2013	Inspection Date(s)	September 21-24, 2015

Inspection Summary:

The Ferndale Storage Terminal is located in Ferndale, WA. It serves primarily as a butane/propane storage facility (there is some non-jurisdictional propane that is also transported by truck and rail from the facility). There are two storage tanks that were designed to API 620 R specifications-T1 is in propane service and T2 is butane. The tanks are virtually identical and have a combined total capacity of 790000 barrels and were constructed in 1977 and 1994 respectively. In late 2014, tank T1 underwent its first API 653 inspection (this was a finding in the 2013 inspection). There were no findings or recommendations as a result of the inspection. AltaGas also took this opportunity to replace pipe, add new pumps, upgrade the level control and other various tasks. Some of these were on regulated facilities and were reviewed during this inspection. There is approximately 250 feet of low-stress jurisdictional pipeline installed above ground within the fence line of AltaGas (this was an issue see below). There is also a 30 foot underground section in a casing under Unick Road which is the inlet line from Philips 66 refinery.

This inspection reviewed select policies and procedures, O&M records, construction records, OQ qualifications and life of the pipeline documents (pressure tests –see below) as well as field OQ evaluation as noted on Form 13.

Two issues came up during this inspection:

195.302 General Requirements

(a) *Except as otherwise provided in this section and in §195.305(b) , no operator may operate a pipeline unless it has been pressure tested under this subpart without leakage. In addition, no operator may return to service a segment of pipeline that has been replaced, relocated, or otherwise changed until it has been pressure tested under this subpart without leakage.*

(b) *Except for pipelines converted under §195.5, the following pipelines may be operated without pressure testing under this subpart:*

(1) *Any hazardous liquid pipeline whose maximum operating pressure is established under §195.406(a)(5) that is-*

(i) *An interstate pipeline constructed before January 8, 1971;*

(ii) *An interstate offshore gathering line constructed before August 1, 1977;*

(iii) *An intrastate pipeline constructed before October 21, 1985; or*

(iv) *A low-stress pipeline constructed before August 11, 1994, that transports HVL.*

Section (b)(iv) applies to AltaGas. The issue was whether the line to T2 was “constructed” prior to Aug 11, 1994. AltaGas has records (pictures with date) showing the line constructed and in place prior to this date, however, the pressure test occurred in November, 1994. In discussion with Joe Subsits, WUTC Chief Engineer, it was determined the line was constructed as it was in place, coated and waiting for the tank construction to be completed. **No violation**

195.208 Welding of supports and braces. *Supports or braces may not be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i. (689 kPa) gage.*

The AltaGas was facility was constructed by Texaco in the early 1970’s to support the refineries (Tank T2 and associated piping was constructed in 1994) in producing and storing HVL products (primarily butane and propane). It was constructed under ASME B31.3 Standard for Process Piping. Regulation by WUTC started in 2009 when then owner/operator, Chevron, requested a determination as to whether they fell under the Part 195 regulation. As they can both receive HVL products from the refineries, P66 and BP, and send HVL products to these refineries, out of Tanks T1 and T2, they are considered breakout tanks and are regulated under Part 195. The piping to and from the P66 refinery (as well as within the refinery) and to the transfer point with BP piping, is supported by pipe stands which are welded directly to the pipeline. 195.208 is a new construction specification and if this facility was being built today, would apply.

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This inspection reviewed select policies and procedures, O&M records, construction records, OQ qualifications and life of the pipeline documents (pressure tests –see below) as well as field OQ evaluation as noted on Form 13.

However, the facility was in operation well before the question of jurisdiction was asked in 2009. Since the facility went into operation more than 40 years ago, there is no history of leaks, corrosion, or issues associated with the above ground piping and the welded supports. Given the likelihood of significantly increased risk of the same by removing the welded supports from the pipeline, damaging the coating and installing new supports, it is not in the public safety interest to change out the pipe supports until a project requiring this change occurs. **No violation.**

There is one area of concern: AltaGas should separate DOT pipeline records from non-DOT pipeline records as part of construction related paperwork and filing records. Trying to find DOT required records within the large volume of total project paperwork was cumbersome and time consuming.

HQ Address: Petrogas Inc 15840 FM 529 Suite 270 Houston, Texas 77095		System/Unit Address: AltaGas Facilities (US) Inc 4100 Unick Road Ferndale, WA 98248	
Co. Official:	Steve Warsinske	Phone No.:	360-384-1701
Phone No.:	810-887-4720	Fax No.:	
Fax No.:		Emergency Phone No.:	360-384-1701
Emergency Phone No.:			
Persons Interviewed		Title	
Andrew Gamble		Operations Manager	
Gary McSpadden		Maintenance Coordinator	
Paul Rasavage		Sr Technical Advisor	
Michelle Smith		Partner, Environmental Resources Management	
Gaitlin McConnell		Process Safety Coordinator	
Brandy Eichhorn		Manager and Human Resources Business Partner	
		Phone No.	
		(360) 380-8510	
		3603841701	
		3603841701	
		3606473900	
		3603841701	
		4036917001 (Calgary)	

UTC staff conducted abbreviated procedures inspection on 195 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)

Team inspection was performed (Within the past five years.) or,	Date:	
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.) Altagas is a new operator (assets purchased from Chevron). Technical assistance inspection which included O&M procedures, D&A, and OQ was performed 12/14 to allow for continued operation. This standard inspection focused on records since that date to ensure adequacy of operations. Detailed O&M inspection will occur in 2016.	Date:	12/14

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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			

Comments:

RECORDS REVIEW			S	U	NA	NC
CONVERSION TO SERVICE No conversions						
1.	195.5(a)(2)	All aboveground segments of the pipeline, and appropriately selected underground segments must be visually inspected for physical defects and operating conditions which reasonably could be expected to impair the strength or tightness of the pipeline.			X	
2.	195.5(c)	Pipeline Records (Life of System)			X	
3.		Pipeline Investigations			X	
4.		Pipeline Testing			X	
5.		Pipeline Repairs			X	
6.		Pipeline Replacements			X	
7.		Pipeline Alterations			X	
REGULATED RURAL GATHERING LINES No gathering lines			S	U	NA	NC
8.	195.11(a)	Operator has identified pipelines that are Regulated Rural Gathering Lines that meet all of the following criteria: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter from 6 5/8 inches to 8 5/8 inches; (2) located in or within one-quarter mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
9.	195.11(b)	Operator has prepared written procedures to carry out the requirements of 195.11 . (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> • Subpart B Reporting • Corrosion Control • Damage Prevention • Public Awareness • Establish MAOP • Line Markers • Operator Qualification 			X	
10.	195.11(c)	If a new USA is identified after July 3, 2008, the operator must implement the requirements in paragraphs (b)(2 - 8), and (b)(11) for affected pipelines within 6 months of identification. For steel pipelines, comply with the deadlines in paragraphs (b)(9 & 10).			X	
11.	195.11(d)	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) of this section and the records required to comply with (b)(10) of this section, for the life of the pipe. (2) Records necessary to demonstrate compliance (b)(2 – 9 & 11) of this section according to the record retention requirements of the referenced section or subpart.			X	

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Comments:

LOW-STRESS PIPELINES IN RURAL AREA No pipelines meeting this definition			S	U	NA	NC
12.	195.12(a)	Operator has identified pipelines that are Regulated Low-stress Pipelines in Rural Areas that meet all of the following criteria: (except for those already covered by 49 CFR 195) (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter of 8 5/8 inches or more; (2) located in or within one-half mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			X	
13.	195.12(b)	Operator has prepared written procedures to carry out the requirements of 195.12 . (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> Subpart B Reporting Establish Integrity Management Plan All Part 195 Safety Requirements 			X	
14.	195.12 (c)(1)	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).			X	
15.	195.12(d)	If, after July 3, 2008, a new USA is identified, the operator must implement the requirements in paragraphs (b)(2)(i) for affected pipelines within 12 months of identification. (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			X	
16.	195.12(d)	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) for the life of the pipeline. (2) Records necessary to demonstrate compliance (b)(2 – 4) according to the record retention requirements of the referenced section or subpart.			X	

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REPORTING						
17.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted? Submitted 4-2-15 to NPMS	X			
18.	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? MOP is 250			X	
19.	195.48/49	Complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year for each commodity, and each state a pipeline traverses by June 15 of each calendar year.	X			
20.	195.52	Immediate notice to NRC (800) 424-8802, or electronically at http://www.nrc.uscg.mil , of certain events, 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. (Amdt. 195-95, 75 FR 72878, November 26, 2010, eff. 1/1/2011). No accidents requiring immediate notice			X	
21.	195.54(a)	Accident Report - file as soon as practicable, but no later than 30 days after discovery. Submittal must be electronically to http://portal.phmsa.dot.gov/pipeline (Amdt. 195-95, 75 FR 72878, November 26, 2010). No accidents			X	
22.	195.54 (b)	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) No accidents			X	
23.	195.56(a)	SRC Report is required to be filed within five (5) working days of the determination and within ten (10) working days after discovery 195.56(a) (195.55(a)) No SRCs			X	
24.	195.56(b)	SRC Report requirements, including corrective actions (taken and planned) No SRCs			X	
25.	195.57	Do records indicate reports were submitted within 60 days of completing inspection of underwater pipelines? 195.413(a) (195.57) No SRCs			X	
26.	195.59	Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? None			X	
27.	195.64	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline (Amdt. 195-95, 75 FR 72878, Nov.26, 2010, eff. 1/1/2011).	X			
28.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction Altagas notified WUTC prior to inspection of Tank T1.	X			
29.	480-75-620	Was MOP changed based on hydrotest? Report submitted? No change			X	
30.	480-75-630(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours of discovery) for events which results in; No accidents or incidents a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection.			X	

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31.	480-75-630(2)	Written reports to the commission within 30 calendar days of the incident. The report must include the following: No accidents or incidents a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; (b) The extent of injuries and damage; (c) A description of the incident including date, time, and place; (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident; (e) The date and time the pipeline returns to safe operations; and (f) The date, time, and type of any temporary or permanent repair.			X	
32.	480-75-630(3)	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline. No accidents or incidents			X	
33.	480-75-630(4)	Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form)				
34.	480-75-630(4)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) no reports to file			X	
35.	480-75-630(4)(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 <u>without facility locates</u> first being completed? no reports to file			X	
36.	480-75-630(4)(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? no reports to file Note: Records maintained for two years and made available to the commission upon request.			X	
37.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities? no reports to file no damages				
38.	480-75-630(5)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 			X	
39.	480-75-630(5)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 			X	
40.	480-75-630(5)(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	
41.	480-75-630(6)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...None to report <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; (630(6)(a) A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b) 			X	

Comments:

CONSTRUCTION Tank T ⁻¹ API 653 Inspection Project 2014			S	U	NA	NC
42.	195.204	Construction Training/Qualification records including personnel who conduct visual inspections (e.g. inspectors of welds) James Pallone was qualified visual inspector	X			
43.	195.214(b)	Detailed Test Results to Qualify Welding Procedures and Qualifying tests Checked GT-146-1, GT-001-1, SM-063-1 for butt welds, fillets for Tank T⁻¹ API 653 Inspection Project 2014	X			

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44.	195.222(a)	Welders must be qualified in accordance with Section 6 of API Standard 1104 (20th edition 2005, including errata/addendum 7/2007 and errata 2 12/2008) or Section IX of the ASME Boiler and Pressure Vessel Code (2007 edition, July 1, 2007) , except that a welder qualified under an earlier edition than currently listed in 195.3 may weld, but may not requalify under that earlier edition. (Amdt 195-94 Pub. 8/11/10 eff. 10/01/10). For the Checked GT-146-1, GT-001-1, SM-063-1 for butt welds, fillets for Tank T -1 API 653 Inspection Project 2014. For this project, AltaGas used Texaco Procedure 72 from 1990 as the appropriate specification for Matrix for this job. Procedure 72 references Section IX of Boiler and Pressure Vessel Standard. Matrix used this to establish WPQ and qualify welders for this job. It should also be noted that ASTM 31.3 is equivalent to Section IX.	X				
45.	195.222(b)	Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has (1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 9 of API 1104. Matrix Continuity Report for Jerry Pena, Ramiro Becerra, Jesse Hayes, Valerian Golovin	X				
46.	195.226(a)	Arc burns must be repaired. Altagas Maintenance and Inspection Procedures MIP 407, Section 5.11	X				
47.	195.226(b)	If a notch is not repairable by grinding, a cylinder of the pipe containing the entire notch must be removed. Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? (Ammonium Persulfate). AltaGas Maintenance and Inspection Procedures MIP 407, Section 5.11	X				
48.	195.226(c)	The ground wire may not be welded to the pipe/fitting being welded. Did not witness welding, but procedure does not allow.					X
49.	195.228/.234	Do procedures require welds to be nondestructively tested to ensure their acceptability according to API 1104 and as per 195.228(b) and per the requirements of 195.234 in regard to the number of welds to be tested?	X				
50.	195.234(b)	Nondestructive testing of welds performed: checked Joseph Rude, David Warren, Eric Greene, Steven Ficken (1) In accordance with written procedures for NDT (2) By qualified personnel (3) By a process that will indicate any defects that may affect the integrity of the weld	X				
51.	195.234(d) 195.266(a)	Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures? 100%	X				
52.	195.234(e) 195.266(a)	Do records demonstrate all girth welds installed each day in selected locations specified in §195.234(e) are nondestructively tested over their entire circumference? Checked 8" girth welds 34, 35, 36, 37, 62,64,77,90-96,230,234,280,284	X				
53.	195.234(f) 195.266(a)	Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested? No used pipe				X	
54.	195.234(g) 195.266(a)	Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins? 100% NDT on all welds	X				
55.	195.266	Construction Records maintained for life of pipeline					
56.	195.266(b)	Amount, Location, Cover of each Size of Pipe Installed Tank T2 Hydro test Aug 2 1994— Fill height 83'-3"; the 'ARCO line 6" A53 Hydrotest, 126-15, 1125 psig, 11/21/94. NO chart available but notes on line drawings by Morse Construction	X				
57.	195.266(c)	Location of each Crossing with another Pipeline Lines do not cross other pipelines				X	
58.	195.266(d)	Location of each buried Utility Crossing Lines do not cross other utilities				X	
59.	195.266(e)	Location of Overhead Crossings None				X	
60.	195.266(f)	Location of each Valve and Test Station	X				
PRESSURE TESTING			S	U	NA	NC	

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61.	195.302(a)	Pipelines, and each pipeline segment that has been relocated, replaced, or otherwise changed, must be pressure tested without leakage (see .302(b), .303, and .305(b) for exceptions). Regulated pipeline to T-1 constructed in 1975. However, per 195.303(b) (iv) A low-stress pipeline constructed before August 11, 1994, that transports HVL is exempt. The lines to T-1 fall under this exemption. The lines to T-2 are in question as to whether they were “constructed” before August 11, 1994. See Inspection Summary above.	X			
62.	195.302(b)/ .302(c)	Except for lines converted under §195.5, the following pipelines <i>may</i> be operated without having been pressure tested per Subpart E and without having established MOP under 195.406(a)(5) [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure]. - .302(b)(2)(ii): Any carbon dioxide pipeline constructed before July 12, 1991, that is located in a rural area as part of a production field distribution system. - .302(b)(3): Any low-stress pipeline constructed before August 11, 1994, that does not transport HVL. - .302(b)(4)/.303: Those portions of older hazardous liquid and carbon dioxide pipelines for which an operator has elected the risk-based alternative under §195.303 and which are not required to be tested based on the risk-based criteria. <i>Note: (An operator that elected to follow a risk-based alternative must have developed plans that included the method of testing and a schedule for the testing by December 7, 1998. The compliance deadlines for completion of testing are as shown in the table in §195.303, and in no case was testing to be completed later than 12/07/2004).</i>				
63.		Have all pipelines <u>other than those described above</u> been pressure tested per Subpart E? See Inspection Summary above	X			
64.		If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under 195.406(a)(5) , in accordance with .302(c)?	X			
65.	195.304	Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required. See Inspection Summary above	X			
66.	195.305(a)	All pipe, all attached fittings, including components, must be pressure tested in accordance with 195.302 . Note: A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory.	X			
67.	195.305(b)	Manufacturer testing of components. Records available and adequate? Hydro tested in place			X	
68.	195.306	Appropriate test medium Used water “hydro”	X			
69.	195.308	Pipe associated with tie-ins pressure tested? Tie ins/branches- shown on drawings-all new at time of construction	X			
70.	195.310(a)	Pipeline Test Records for useful life of facilities? See Inspection Summary above	X			
71.	195.310(b)	Do test records required by paragraph (a) include: low stress HVL line exempt from				
72.	195.310(b)(1)	Pressure recording charts No pressure recording chart-See Inspection Summary above	X			
73.	195.310(b)(2)	Test instrument calibration records No instrument calibration records- See Inspection Summary above	X			
74.	195.310(b)(3)	Name of operator, person responsible, test company used, if any	X			
75.	195.310(b)(4)	Date and time of test No time is given on records, just date - See Inspection Summary above	X			
76.	195.310(b)(5)	Minimum test pressure Note: min not given, just test pressure - See Inspection Summary above	X			
77.	195.310(b)(6)	Test medium” hydro”	X			
78.	195.310(b)(7)	Description of the facility tested and the apparatus None given - See Inspection Summary above	X			

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79.	195.310(b)(8)	Explanation of any pressure discontinuities, including test failures that appear on the pressure recording charts. No chart- See Inspection Summary above	X			
80.	195.310(b)(9)	Where elevation differences in the test section exceed 100 feet , a profile of the elevation over the entire length of the test section must be included none			X	
81.	195.310(b)(10)	Temperature of the test medium or pipe during the test period not given		X		

Comments:
Will recommend in exit interview they separate DOT pipe and record requirements on construction projects like the internal inspection T1.

INTERNAL DESIGN PRESSURE PROCEDURES		S	U	NA	NC
.402(c)/.422	Internal design pressure for pipe in a pipeline is determined in accordance with the requirements of this section and the formula: $P = (2 St/D) \times E \times F$. .106	X			

OPERATION & MAINTENANCE			S	U	NA	NC
82.	195.402(a)	Annual Review of O&M Manual (1 per yr/15 months)	X			
83.		Appropriate parts must be kept at locations where O&M activities are conducted	X			
84.	195.402(c)(4)	Determination of Areas requiring immediate response for Failures or Malfunctions	X			
85.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes no accidents			X	
86.	195.402(c)(10)	Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards.			X	
		Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per 195.59 none				
87.	195.402(c)(12)	Establishment/Maintaining liaison with Fire, Police, and other Public Officials	X			
88.	195.402(c)(13)	Periodic review of personnel work – effectiveness of normal O&M procedures and corrective action when deficiencies are found	X			
89.	195.402(c)(15)	Implementing the applicable control room management procedures required by 195.446 . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). No control room meeting 195.446			X	
90.	195.402(e)(1)	Records that indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures. No immediate response events			X	
91.	195.402(e)(2)	Prompt and effective response to each type of emergency Note: Review operator records of previous accidents and failures including third-party damage and leak response. No immediate response events			X	
92.	195.402(e)(7)	Records indicating that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLs)? No immediate response events			X	
93.	195.402(e)(9)	Post accident review of employees’ activities to determine if procedures were effective and corrective action was taken? No immediate response events			X	
94.	195.402(e)(10)	Actions to be taken by a controller during an emergency in accordance with 195.446 . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). No control room			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

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95.	195.403(a)	Records of operator provided training to its emergency response personnel as required	X			
96.	195.403(b)(1)	Annual review with personnel on performance in meeting the objectives of the emergency response training program (1 per yr/15 months)	X			
97.	195.403(b)(2)	Make appropriate changes to the emergency response training program (1 per yr/15 months)	X			

Comments:

OPERATION & MAINTENANCE (Cont)			S	U	NA	NC
98.	195.403(c)	Verification of supervisor knowledge of emergency response procedures (1 per yr/15 months)	X			
99.	195.404(a)(1)	Maps and Records of the following facilities maintained and made available: i. Breakout tanks ii. Pump stations iii. Scraper and sphere facilities iv. Pipeline valves v. Facilities to which 195.402(c)(9) applies vi. Rights-of-way vii. Safety devices to which 195.428 applies	X			
100.	195.404(a)(2)	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines.	X			
101.	195.404(a)(3)	The maximum operating pressure of each pipeline in accordance with 195.406	X			
102.	195.404(a)(4)	The diameter, grade, type, and nominal wall thickness of all pipe.	X			
103.	195.404(b)(2) 195.402(d)(1)	Response to any emergency or abnormal operations applicable under 195.402 (maintained for at least 3yrs) as required by written procedures none			X	
104.	195.404(b) 195.402(d)(5)	Periodic review of personnel work – effectiveness of abnormal operation procedures/corrective action taken when deficiencies found.	X			
105.	195.404(c)(1)	The date, location, and description of each repair made on the pipe and maintain it for the life of the pipe . Chevron MOV hydro	X			
106.	195.404(c)(2)	The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least 1 year . No repairs			X	
107.	195.404(c)(3)	Each inspection and test required by Subpart F shall be maintained for at least 2 years, or until the next inspection or test is performed, whichever is longer .	X			
108.	195.406(a)/ .406(a)(1)	Except for surge pressures and other variations from normal operations, no operator shall operate a pipeline above the MOP, and the MOP may not exceed any of the following; • The internal design pressure of the pipe determined by 195.106. Limited to 250 psi based on pump curve	X			
109.	480-75-620	Change in MOP? Changed based on hydrotest? none			X	
110.	195.408(b)	Records indicating emergency communication system(s) use was as required no emergencies			X	
111.	195.412(a)	Operator must inspect the right-of-way at intervals not exceeding 3 weeks , but at least 26 times each calendar year	X			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

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112.	195.412(b)	Records indicating ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed	X			
113.	480-75-640	Depth of cover surveys and mitigation 30' of pipe under Unick Rd, checked visually daily.			X	
114.	195.420(b)	Mainline valves inspected to determine that it is functioning properly at intervals not exceeding 7½ months, but at least twice each calendar year. AltaGas does monthly valve check/maintenance-66-C4 2275, 66-C3 2272, BP C4 2029, 66-C4 660-1 OQ for valve inspect and maintenance for H. Radcliff OK --August 20, 2014	X			
115.	480-75-500	Pipe movement study per API 1117 None			X	
116.	195.428(a)	Insp. of overpressure safety devices (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL) Note changed out all PSVs rated at 400 psi to 250 psi which is MOP 5/21/15	X			
117.	195.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE 5 yrs). All thermal PSVs get swapped out annually. All others get sent to Bay valve for rebuilding, testing.	X			
118.	195.428(c)	Above ground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overflow protection system installed according to section 5.1.2 of API Standard 2510. Amt. 195-86 Pub. 06/09/06 eff. 07/10/06. Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overflow protection according to API Recommended Practice 2350 unless operator noted in procedures manual (195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank. No significant alterations			X	
119.	195.428(d)	Inspection of Overflow Systems (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL) 1 inspection cycle since AltaGas took operation. 8/26/15	X			
120.	480-75-300 (3)	Leak detection and alarm records	X			
121.	480-75-320	Control valve set at 40 psi relieves back to tank via a 6" line. PSVs set at 250 relieve to atmosphere via a 2" back to tanks.	X			
122.	195.430	Inspection of Fire Fighting Equipment	X			
123.	195.432(c)	Breakout Tanks: Inspect the physical integrity of in-service steel aboveground breakout tanks built to API Standard 2510 according to Section 6 of API 510. Amt. 195-86 Pub. 06/09/06 eff 07/10/06. Note: For Break-out tank unit inspection, refer to Breakout Tank Form No 2510 tanks.			X	

PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162) WUTC audit Aug 26 2015		S	U	NA	NC	
124.	PUBLIC AWARENESS PROGRAM				X	
	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. Not checked-PA inspection completed 8/26/15 no issues.					
	Operators in existence on June 20, 2005, must have completed their written program no later than June 20, 2006					
	API RP 1162 Baseline* Recommended Message Delivery Frequencies					
	Stakeholder Audience (Hazardous Liquid Operators)					Baseline Message Frequency (Starting from Effective Date of Plan)
	Residence along right-of-way and Places of Congregation					2 Years
	Emergency Officials					Annual
	Public Officials					3 Years
	Excavator and Contractors					Annual
	One-Call Centers					As required of one-call center
* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, record keeping, program evaluation, etc.						

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

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125.	.440(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. Not checked-PA inspection completed 8/26/15 no issues.				X
126.	.440(i)	Records indicating that the continuing public education program evaluation process has been implemented and do records indicate that continuous improvement is being implemented Not checked-PA inspection completed 8/26/15 no issues.				X

Comments:

DAMAGE PREVENTION PROGRAM			S	U	NA	NC
127.	195.442(a)	Records indicating the damage prevention program is being carried out as written	X			
128.	195.442(c)(1)	List of Current Excavators	X			
129.	195.442(c)(2)	Notification of Public/Excavators	X			
130.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records)	X			
131.	195.442(c)(4)	If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings. None			X	
132.	195.442(c)(5)	Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins. None			X	
133.	195.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
134.		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? None			X	
135.		2. In the case of blasting, does the inspection include leakage surveys? (required) None			X	
136.		Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reoccurrence? No failures or accidents			X	
137.	OPERATOR QUALIFICATION					
138.	195.507(a) .507(b)	Are personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
139.	195.507(a) .507(b)	Are qualification records available for contractor personnel that contain the required elements?	X			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

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Comments:

CPM SYSTEMS No CPM system in use			S	U	NA	NC
140.		Each CPM system employed on a pipeline segment should be fully described and the documentation readily available for reference by the users and by those employees responsible for the maintenance and support of the CPM system				
141.	195.444	a. General Information (this information is usually available as a part of normal Control Center information). b. A system map, profile and detailed physical description for each pipeline segment. c. A summary of the characteristics of each product transported.			X	
142.		CPM Specific Information:				
143.	195.444	a. A tabulation of the inputs used in the CPM procedure for each pipeline segment. b. A general description of the CPM outlining its principles of operation. c. A list of special considerations or step-by-step procedures to be used in evaluating CPM results and for requesting assistance with alarm evaluation, e.g., on-call support phone numbers where this systems is implemented.			X	
144.		d. Details of the expected performance of the leak detection system under normal and line upset conditions; and the effects of system degradation on the leak detection results. e. CPM pipeline controller training manuals or information. f. CPM alarm thresholds for the various applications.			X	

Comments:

CORROSION CONTROL			S	U	NA	NC
145.	195.589(c) 195.555	Supervisors maintain thorough knowledge of corrosion procedures. Philip Mhyre ENW CBT2212 John Kennedy, Norton CP Specialist	X			
146.	195.589(c) 195.567(c)	Test lead maintenance / Frequent enough intervals	X			
147.	480-75-510	Corrosion remediation within 90 days No corrosion issues needing remediation			X	
148.	195.589(c) 195.569	Inspection of Exposed Buried Pipelines (External Corrosion) No buried exposed pipe			X	
149.	195.589(c) 195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (1 per yr/15 months) Feb 8 2015	X			
150.	195.589(c) 195.573(a)(2)	Close Interval Surveys - when circumstances dictated a need for surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys? Buried pipe is 50 feet in length inside a casing			X	
151.	195.589(c) 195.573(b)(1) & (2)	External Corrosion Control, Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/NTE 39 months) None			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

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152.	195.589(c) 195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers Josh Claypool, Philip Mhyer OQ EWN 442792 CBT Rectifiers OK	X			
153.	195.589(c) 195.573(e)	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control? None			X	
154.	195.589(c) 195.575(a-d)	Electrical isolation inspection, testing and monitoring (if applicable)	X			
155.	195.589(c) 195.577(a)	Testing for Interference Currents Look for abnormalities from previous inspections.	X			
156.	195.589(c) 195.579(a)	Corrosive effects investigation None			X	
157.	195.589(c) 195.579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (2 per yr/NTE7½ months) None			X	
158.	195.589(c) 195.579(b)(1-3)	Corrosion inhibitors used in sufficient quantities None			X	
159.	195.589(c) 195.579(a)(c)	Inspection of Removed Pipe for Internal Corrosion None			X	
160.	195.589(c) 195.583(a-c)	Atmos. Corr. Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) UT/NDT entire system, November 2014 Furmante Report Altagas Terminal 2014 Piping Inspection; operators do a check 2x per day-reviewed DOT pipeline inspections logs.	X			
161.	195.589(c) 195.585(a)	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG None			X	
162.	195.585(b)	Localized Corrosion Pitting – replace, repair, reduce MOP None			X	
163.	195.589(a)&(b) 195.563(a)	Cathodic Protection Do records document when cathodic protection was operational on constructed, relocated, replaced, or otherwise changed pipelines within the last 5 years? (Maps showing anode location, test stations, CP systems, protected pipelines, etc.) None			X	

Comments:
CP –designed by John Keppler, Norton, 15 yrs ago. 6 stacks two anodes in each. Shallow system 15 to 20 feet deep. Isolated from other sources.

FIELD REVIEW			S	U	N/A	N/C
164.	195.262(a)	Has adequate ventilation been provided at pump station buildings? No buildings			X	
165.	195.262(a)	Have warning devices that warn of the presence of hazardous vapors been installed at new pump station buildings? Carbon detectors are located throughout the plant including near the pumps.	X			
166.	195.262(b)	Has a device for activating emergency shutdown of the pump station been installed? ESDs are located throughout the plant	X			
167.	195.262(b)	If power is needed to actuate safety devices, has an auxiliary power supply been provided? Backup generators	X			
168.	195.262(b)	Have safety devices been installed to prevent over-pressuring new or modified pumping equipment?	X			
169.	195.262(d)	Has on-shore pumping equipment been installed on property under the control of the operator and is that equipment at least 50 feet from the boundary of that property?	X			
170.	195.262(e)	Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps? Backup generators	X			
171.	195.302	Is pressure testing being adequately conducted? (.304, .305, .306, .307) Not witnessed			X	
172.	195.308	Pre-pressure Testing Pipe - Marking and Inventory none			X	
173.	195.402(c)(13)	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site. not witnessed			X	

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FIELD REVIEW			S	U	N/A	N/C
174.	195.403(c)	Supervisor Knowledge of Emergency Response Procedures	X			
175.	195.410	Are line markers placed and maintained as required? 195.410(a) (195.410(b); 195.410(c); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	X			
176.	480-75-540	Markers at exposed areas	X			
177.	195.412	Are the ROW conditions acceptable for the type of patrolling used?	X			
178.	195.420 (a), (b)	Valve Maintenance & Operation	X			
179.	195.420(c)	Valve Protection from Unauthorized Operation and Vandalism	X			
180.	195.426	Are launchers and receivers equipped with relief devices?	X			
181.	195.428(a)	Are inspections of overpressure safety devices adequate (including HVL lines)?	X			
182.	195.428(a)	Do pressure control devices installed on HVL pressure breakout tanks appear to be in satisfactory mechanical condition and to be functioning properly?	X			
183.	195.428(c)	Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.] tested ESD, high level alarm and hydrocarbon alarm	X			
184.	480-75-320	Relief Device set at or below MOP Did not check but records indicate below MOP				X

Comments:
 During field review, noted new pipe stands welded directly to pipe T1 outlet-however, this pipe is on suction side of pump so line pressure does not exceed 100 psi. Also noted older pipe stands welded directly to DOT pipeline on P66 line. See Inspection Summary above.

FIELD REVIEW (Cont)			S	U	N/A	N/C
185.	480-75-300	Leak Detection – 8% in 15 Minutes Not required			X	
186.	480-75-300	Leak detection at flow and no flow conditions Not required			X	
187.	195.430	Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly? (195.430(a) (195.430(b); 195.430(c); 195.262(e))	X			
188.	195.432	Breakout Tanks	X			
189.	480-75-330	Do Breakout Tanks have independent overfill alarms?	X			
190.	195.434	Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?	X			
191.	195.436	Security - Pumping Stations - Breakout Tanks	X			
192.	195.438	Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?	X			
193.	195.446(a)	Is the SCADA display representative of the system configuration? 195.404(a) (195.505(f); 195.446(h))	X			
194.	195.446(b)	Do operating personnel know the MOP of respective pump stations and associated alarm settings?	X			
195.	195.446(h)	Do controllers demonstrate adequate skills and knowledge? 195.505(b) (195.446(g)(2)) Yes, but are not controllers per control room protocols	X			

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Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

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196.	195.501- 195.509	Important: Per OPS, the OQ Field Inspection Protocol Form 15 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 located at http://primis.phmsa.dot.gov/oqdb/home Form Completed/Uploaded? Y/N X			
197.	195.571	Cathodic Protection (test station readings, other locations to ensure adequate CP levels)	X		
198.	195.573	Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?	X		
199.	195.575	Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? 195.575(a) (195.575(b); 195.575(c); 195.575(d))	X		
200.	195.583	Atmospheric corrosion - Exposed pipeline components, (splash zones, water spans, soil/air interface, under thermal insulation, disbanded coatings, pipe supports, deck penetrations, etc.) 195.583(c) (195.581(a))	X		

Comments:

Recent PHMSA Advisory Bulletins (Last 2 years)

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-12-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-12-09	Oct 11, 12	Communication During Emergency Situations
ADB-12-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB -12-06	May 7, 12	Verification of Records Establishing MAOP and MOP.
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

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