Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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 **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

Inspection Report			
Inspection ID/Docket number	**6219**		
Inspector Name & Submit Date	**Anthony Dorrough, June 10, 2015**		
Chief Eng Name & Review Date	**Joe Subsits, June 24, 2015**		
Operator Information			
Name of Operator:	**Lamb Weston/BSW**	**OP ID #:**	**32560**
Name of Unit(s):	**Warden, WA**		
Records Location:	**Warden, WA**		
Date(s) of Last (unit) Inspection:	**September 2012**	**Inspection Date(s):**	**May 19-20 2015**

Inspection Summary:

Pipeline Safety staff (staff) conducted a natural gas Standard Inspection of Lamb Weston/BSW transmission line in Warden WA. An exit interview was held at the Lamb Weston/BSW facility on May 20, 2015 for records, O&M, emergency response, inventory and field inspection.

Staff verified that the Lamb Weston/BSW intrastate transmission line continues to run from the William's gate station (and R46) to the R26 regulator station on the NE corner of Road U and County Line Road. A HP line then exits R26 and comes up inside the processing plant in Warden WA.

Staff verified that Williams continues to provide natural gas (gas) at 700-800 psi to the inlet MAOP 809 of Regulator R46. Regulator R46 outlet MAOP is 250. The pipeline is X46 6 inch diameter with 0.188 inch wall. From R46 the pipeline crosses under Road U (South) and turns East to parallel Road U on the South side. The 6 inch pipeline continues east till just west of the intersection with County Line Road. The pipeline goes under Road U again and travels North on the West side of County Line Road. When the pipeline comes even with the R26 regulator just past Basin St. the pipeline turns east under County Line Rd and enters the regulator station on the NE corner of intersection. 6 in MAOP of 250 on the inlet side of R26 and outlet is 4 inch with MAOP 150 for delivery to Lamb Weston.

The following issues were noted during the inspection:

WAC 480-93-110 Corrosion Control

(2) Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)

Findings: A records review of Lamb Weston's "Cathodic Protection Survey" (dated 02/12/15) revealed a cathodic protection (CP) read of -0.241 VDC, below Lamb Weston's protective criteria established at -0.850 VDC Lamb Weston could not document that remedial action was taken within ninety days as required by code. (NOPV)

49 CFR §192.614 Damage Prevention Program

(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:
(6) Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:
(i) The inspection must be done frequently as necessary during and after the activities to verify the integrity of the pipeline;

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

Inspection Summary:

Findings: A review of Lamb Weston's One –Call Records showed that there was an incidence where excavation activity took place within 35-feet of underground facilities. When asked by staff, Lamb Weston could provide no documentation that a follow up inspection had occurred at that location to verify the integrity of the pipeline. Lamb Weston's procedures are vague and need to specifically state how Lamb Weston will inspect for damage after an excavation that is in close proximity to underground facilities, as well as define what is considered to be close proximity. (NOPV)

49 CFR §192.463 External Corrosion Control: Cathodic Protection

(a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of this criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.

Findings: During the field verification portion of the inspection, a CP read of -0.198 VDC, below Lamb Weston's protective criteria established at -0.850 VDC, was recorded at the same site as the low CP read referenced earlier in the "Cathodic Protection Survey" (dated 02/12/15). Lamb Weston failed to provide a level of cathodic protection required by the code. (NOPV)

WAC 480-93-170 Tests and Reports for Gas Pipelines

(10) Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then pressure testing equipment must be tested for accuracy at an appropriate schedule determined by the gas pipeline company. Test equipment must be tagged with the calibration or accuracy check expiration date. The requirements of this section also apply to equipment such as pressure charts, gauges, dead weights or other devices used to test, monitor or check system pressures or set-points.

Findings: Operations records indicate that Lamb Weston's pressure testing equipment and instrumentation are regularly calibrated on a set schedule. Pressure testing must always be performed with calibrated equipment. During the field verification portion of the inspection, Northwest Metal Fab personnel did not have calibrated gauges on hand to perform lock-up and stroke testing. (NOPV)

49 CFR §192.805 Qualification Program

Each operator shall have and follow a written qualification program. The program shall include provisions to:
(b) Ensure through evaluation that individuals performing covered tasks are qualified;

Findings: NW Metal Fab personnel were not cognizant of the AOC associated with a low CP read at a CP survey test site where there were obvious physical signs that the pipeline may have suffered excavation damage. NW Metal Fab personnel's solution was to arbitrarily remove the CP test site from being read for the survey. (NOPV)

HQ Address:	**System/Unit Name & Address:**
1203 Basin Street **Warden, WA 98857**	
Co. Official: **Marvin Price** **Phone No.:** **509-349-2210 ext 54704** **Fax No.:** **Emergency Phone No.:** **509-750-6193**	**Phone No.:** **Fax No.:** **Emergency Phone No.:**

Persons Interviewed	Title	Phone No.
Marvin Price	Manager, Energy & Environment	509-349-2210 ext 54704
Kevin O'Hogan	Operator, NW Metal Fab	503-793-7045
Brian Yechout	Operator, NW Metal Fab	503-793-7045

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

UTC staff conducted 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.			
☐	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.)	**Date:**	**2012**

GAS SYSTEM OPERATIONS			
Gas Supplier	**Williams**		
Number of reportable safety related conditions last year **0**		Number of deferred leaks in system **0**	
Number of non-reportable safety related conditions last year **0**		Number of third party hits last year **0**	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) **4.5**			
Operating Pressure(s):		**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:	**Williams**	**809**	**150 for 6-inch, 100 for 4-inch**
Town:			
Other:			
Does the operator have any transmission pipelines?	**4.0 miles of Class 1**		
Compressor stations? Use Attachment 4.	**No compressor stations**		

Pipe Specifications:			
Year Installed (Range)	**2000**	Pipe Diameters (Range)	**6-inch & 4-inch**
Material Type	**X46, 0.188 wall**	Line Pipe Specification Used	**API 5L**
Mileage	**4.0 miles to first cut to 100 psig**	SMYS %	**Below 20% is 10.4% @ 150 psig**
Supply Company	**Williams**	Class Locations	**Class 1**

Integrity Management Field Validation
Important: Per PHMSA, IMP Field Verification Form 16 (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 **---Previously Lamb Weston/BSW has performed a class location study and found no Class 3 or 4 sections on their pipeline.**

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		**S**	**U**	**NA**	**NC**
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection. **---Form 13 sent to Stanley.kastanas@dot.gov see copy of form in SharePoint file**	**X**			

PART 192 Implement Applicable Control Room Management Procedures		**S**	**U**	**NA**	**NC**
.605(b)(12)	Implementing the applicable control room management procedures required by 192.631. (Amdt. 192- 112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). **---No Control Rooms**			**X**	

REPORTING RECORDS	**S**	**U**	**N/A**	**N/C**

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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
1.	49 U.S.C. 60132, Subsection (b) ADB-08-07	**Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 ---Reports on website to PHMSA** Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to http://www.npms.phmsa.dot.gov/submission/ to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates.	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? **---Pipeline operates at less than 250 psig**			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.	X			
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline unless an alternative reporting method is authorized IAW with paragraph (d) of this section. **---No Reports**			X	
5.	191.15(a)	Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe? **---No reportable incidents**			X	
6.	191.15(c)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe? **---No incident 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**: June 15, 2013 for the year 2012).*	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline	X			
9.	191.23	Have complete and accurate Annual Reports been submitted?	X			
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. **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: • 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. **---No SRCR**			X	
11.	191.27(a), (b)	Do records indicate reports were submitted within 60 days of completing inspections of underwater pipelines? **---No SRCR**			X	
12.	192.727(g)	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? **---No abandoned facilities**			X	
13.	480-93-200(1)	Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9144** (Within **2 hours**) for events which **(regardless of cause)**;				
14.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization; **---No reports**			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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
15.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; **---No reports** **Note:** Report all damages regardless if claim was filed with pipeline company or not.			X	
16.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas; **---No reports**			X	
17.	480-93-200(1)(d)	Results in the unintentional ignition of gas; **---No reports**			X	
18.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; **---No reports**			X	
19.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; **---No reports**			X	
20.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or **---No reports**			X	
21.	480-93-200(2)	Telephonic Reports to UTC **Pipeline Safety Incident Notification 1-888-321-9146** (Within **24 hours**) for; **---No reports**			X	
22.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; **---No reports**			X	
23.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; **---No reports**			X	
24.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or **---No reports**			X	
25.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP **---No reports**			X	

Comments:

			S	U	N/A	N/C
26.	480-93-200(5)	Written incident reports (within 30 days) including the following;				
27.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; **---No reports**			X	
28.	480-93-200(4)(b)	The extent of injuries and damage; **---No reports**			X	
29.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; **---No reports**			X	
30.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; **---No reports**			X	
31.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; **---No reports**			X	
32.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; **---No reports**			X	
33.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; **---No reports**			X	
34.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; **---No reports**			X	
35.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; **---No reports**			X	
36.	480-93-200(4)(j)	Line type; **---No reports**			X	
37.	480-93-200(4)(k)	City and county of incident; and **---No reports**			X	
38.	480-93-200(4)(l)	Any other information deemed necessary by the commission. **---No reports**			X	
39.	480-93-200(5)	Submit a supplemental report if required information becomes available **---No reports**			X	
40.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any **incident or hazardous condition** due to **construction defects or material failure** **---No reports**			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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:

41.	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)				
42.	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			
43.	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			
44.	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			
45.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
46.	480-93-200(8)(a)	• Notification requirements for excavators under RCW 19.122.050(1)	X			
47.	480-93-200(8)(b)	• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and	X			
48.	480-93-200(8)(c)	• 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			
49.	480-93-200(9)	**Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities…** • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a) • A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b)	X			
50.	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)	X			
51.	480-93-200(10)	**Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year. ***(NOTE**: PHMSA extension to June 15, 2013 for the year 2012).*	**S**	**U**	**N/A**	**N/C**
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. **---No reports**	X			
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. **---No construction activity**			X	
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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 ---No Construction Activity			**S**	**U**	**N/A**	**N/C**
57.	192.225	Do records indicate weld procedures are being qualified in accordance with §192.225?			X	
58.	192.227	Do records indicate adequate qualification of welders?			X	
59.	192.241(a)	Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)?			X	
60.	192.243(b)(2)	Do records indicate the qualification of nondestructive testing personnel?			X	
61.	192.243(c)	Do records indicate that NDT implementation is adequate?			X	
62.	192.243(f)	Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?			X	
63.	192.243(f)	Number of Welds Inspected by NDT			X	
64.	192.243(f)	Number of Welds Rejected			X	
65.	192.243(f)	Disposition of each Weld Rejected			X	
66.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			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 pipelines and main			X	
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
70.	192.303	Construction Specifications			X	
71.	192.325	Do records indicate pipe is installed with clearances in accordance with §192.325, and (if plastic) installed as to prevent heat damage to the pipe?			X	
72.	192.327	Amount, Location, Cover of each size of pipe installed			X	
73.	192.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) does it meet the additional construction requirements for: • Quality assurance • Girth welds • Depth of cover • Initial strength testing, and; • Interference currents?			X	
74.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length			X	
75.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines			X	
76.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule)			X	
77.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig			X	
78.	192.455	Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?			X	

Comments:

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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
79.	192.10	Do records indicate specific point(s) at which operating responsibility transfers to a producing operator, as applicable? **---No**			X	
80.	192.14	**Conversion To Service Performance and Records ---No pipeline converted to service**				
81.	192.14(a)(2)	Visual inspection of right of way, aboveground and selected underground segments			X	
82.	192.14(a)(3)	Correction of unsafe defects and conditions			X	
83.	192.14(a)(4)	Pipeline testing in accordance with Subpart J			X	
84.	192.14(b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline)			X	
85.	192.16	Customer Notification (**Verification – 90 days – and Elements**) **---No services**			X	
86.	192.603(b)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) .605(a) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09 **---Mr. Price still reviews the manual**	X			
87.	192.603(b)	Did personnel respond to indications of abnormal operations as required by procedures? .605(c) (1) **---No abnormal operations**			X	
88.	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3) **---Staff verified records availability was adequate**	X			
89.	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8) **---Mr. Price still reviews O&M procedures annually**	X			
90.	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4) **---No abnormal operations**			X	
91.	192.603(b)	Do records indicate systematic and routine testing and inspection of pipe-type or bottle-type holders? .605(b)(10)	X			
92.		**Damage Prevention Program**				
93.	192.603(b)	List of Current Excavators .614 (c)(1) **---Operator currently lists (32) excavators**	X			
94.	192.603(b)	Notification of Public/Excavators .614 (c)(2)	X			
95.	192.603(b)	Notifications of planned excavations. (One -Call Records) .614 (c)(3)	X			
96.	.614(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
97.		1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline? **---Staff found that Lamb Weston/BSW was aware that work, including possible excavation was planned at a location in close proximity to the pipeline. Lamb Weston/BSW failed to perform an inspection of the work site after these activities to verify the integrity of the pipeline and was unsure whether or not there was any excavation damage.**		X		
98.		2. In the case of blasting, does the inspection include leakage surveys? (required)	X			
99.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample.	X			
100.	195.507(b)	Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
101.	PHMSA – State Program Evaluation Questions	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) **---The operator and operations contractor are still the same people that do the locating.**	X			
102.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?	X			
103.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	X			
104.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
105.		Review operator locating and excavation procedures for compliance with state law and regulations. **---Last inspection staff noted that the O&M manual refers to Oregon instead of Washington; Staff this time verified that the correct state was indicated.**	X			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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
106.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
107.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
108.	192.709	Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? 192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f)) **---Pipeline still operates at less than 40% SMYS – no study is required.**			X	
109.	192.605(a)	Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08. .611 **--- MAOP is still below requiring revision.**			X	
110.	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			
111.	192.615	Actions required to be taken by a controller during an emergency in accordance with 192.631. (Amdt. 192-112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). .615(a)(11) **--- This operator has no Control Room**			X	
112.	192.603(b)	Location Specific Emergency Plan .615(b)(1)	X			
113.	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2)	X			
114.	192.603(b)	Employee Emergency activity review, determine if procedures were followed. .615(b)(3)	X			
115.	192.603(b)	Liaison Program with Public Officials .615(c) **---Staff verified in Section 6.2.3 in the O&M Manual**	X			

Comments:

	Public Awareness Program .616	S	U	N/A	N/C
192.603(b)	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.				
	API RP 1162 Baseline* Recommended Message Deliveries				

Stakeholder Audience (Natural Gas Transmission Line Operators)	Baseline Message Frequency (starting from effective date of Plan)
Residents 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, recordkeeping, program evaluation, etc.

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

116.	192.603(b)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .616(d) (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with the unintended release from a gas pipeline facility (3) Physical indications of a possible release; (4) Steps to be taken for public safety on the event of a gas pipeline release; and (5) Procedures to report such an event (to the operator).	X			
117.		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.). .616 (e) & (f)	X			
118.						
119.		The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. .616(g)	X			
120.		Do records indicate implementation of a program evaluation process implemented and continuous improvements based on the findings? 192.616(i) (192.616(h); API RP 1162, Section 2.7 Step 11; API RP 1162, Section 8)	X			
121.		Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 **Note:** Including excavation damage (PHMSA area of emphasis) **---No accidents or failures**			X	

Comments:

122.	192.517	From the review of the results of pressure tests, do the test records validate the pressure test? **---No Pressure Testing**			X	
123.	.553(b)	Do records indicate the pressure uprating process was implemented per the requirements of 192.553? **---No Uprating Planned**			X	
124.	192.709	**Maximum Allowable Operating Pressure (MAOP)**				
125.	.709	**Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.**				
126.		MAOP cannot exceed the lowest of the following: .619 **---Pipeline operates at 10.4% SMYS**				
127.		Design pressure of the weakest element, .619(a)(1) **---Section 12.0 Maximum allowable operating pressure**	X			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

128.	.709	The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in the second column, unless the segment was tested in according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. **For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.** .619(a)(3) **---Pipeline operates at 10.4% SMYS** Pipeline segment / Pressure date / Test date -Onshore gathering line that first became subject to this part (other than §192.612) after April 13, 2006. / March 15, 2006, or date line becomes subject to this part, whichever is later. / 5 years preceding applicable date in second column. Offshore gathering lines / July 1, 1976 / July 1, 1971 All other pipelines / July 1, 1970 / July 1, 1965			X	
129.		.619(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with §192.611. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. **For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. ---Pipeline operates at 10.4% SMYS**			X	
130.		.620 If the pipeline is designed to the alternative MAOP standard in 192.620 does it meet the additional design requirements for: • General standards • Fracture control • Plate and seam quality • Mill hydrostatic testing • Coating • Fittings and flanges • Compressor stations Final rule pub. 10/17/08, eff. 12/22/08 **---Not designed to Alternative MAOP Standard**			X	
131.	480-93-015(1)	Odorization of Gas – Concentrations adequate? **---Staff verified records**	X			
132.	480-93-015(2)	Monthly Odorant Sniff Testing **---Staff verified records**	X			
133.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements **---No Concentrations that did not meet minimum requirements**			X	
134.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) **---Staff verified records**	X			
135.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months) ---Staff verified records**	X			
136.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days? ---Staff verified records**	X			

Comments:

137.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained **---No reported gas leaks**			X	
138.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained **---No leaks from foreign sources**			X	
139.	480-93-187	Gas Leak records – Content **---No leak records to report**			X	
140.	480-93-188(1)	Gas Leak surveys – Coverage **---Staff verified records**	X			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

141.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) **---Staff verified records**	X			
142.	480-93-188(3)	Leak survey frequency **(Refer to Table Below)** **---Staff verified records**	X			

Business Districts (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)**

143.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs **---No special leak surveys**			X	
144.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred **---No special leak surveys**			X	
145.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected**---No special leak surveys**			X	
146.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions **---No special leak surveys**			X	
147.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. **---No special leak surveys**			X	
148.	480-93-188(5)	Gas survey records: Retention/Content **---Staff verified records**	X			
149.	480-93-188(6)	Leak Survey Program/Self Audits **---Staff verified records**	X			
150.	192.709	Patrolling (**Refer to Table Below**) .705**---Staff verified records**	X			

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

151.	192.709	Leak Surveys (**Refer to Table Below**) .706 **---Staff verified records**	X			

Class Location	**Required**	**Not Exceed**
1 and 2	**1/yr**	**15 months**
3	**2/yr**	**7½ months**
4	**4/yr**	**4½ months**

152.	192.605(b)	Abandoned Pipelines; Underwater Facility Reports .727(g) **---No Abandoned Pipelines**			X	
153.	192.709	Compressor Station Relief Devices – Inspection and Testing (**1 per yr/15 months**) .731(a) **---No Compressor Stations on this Pipeline**			X	
154.	192.709	Compressor Station Emergency Shutdown (**1 per yr/15 months**) .731(c) **---No Compressor Stations on this Pipeline**			X	
155.	192.709	Compressor Stations – Detection and Alarms (**Performance Test**) .736(c) **---No Compressor Stations on this Pipeline**			X	
156.	192.709	Pressure Limiting and Regulating Stations – Inspection and Testing intervals (**1 per yr/15 months**) .739 **---Staff verified records**	X			
157.	192.709	Pressure Limiting and Regulator Stations – Capacity Testing or Review (**1 per yr/15 months**) .743 **---Staff verified records**	X			

Comments:

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

158.	192.709	Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary? (**1 per yr/15 months**) .745	X			
159.	192.709	Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? **(1 per yr/15 months**) .749 **---No vaults on this Pipeline**			X	
160.	192.603(b)	Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? .751 **---No Accidental Ignitions**			X	
161.	192.603(b)	Welding – Procedures .225(b) **---No welding during this time period**			X	
162.	192.603(b)	Welding – Welder Qualification .227/.229 **---No welding during this time period**			X	
163.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) **---No NDT during this time period**			X	
164.	192.709	NDT Records (**Pipeline Life**) .243(f) **---No NDT during this time period**			X	
165.	192.709	Repair: pipe (**Pipeline Life**); Other than pipe (**5 years**) **---No Pipe Repair during this time period**			X	
166.	.807(b)	Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (Including new construction activities - WAC 480-93-013) **---Staff verified (50) Covered Tasks**	X			
167.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) **---Staff verified no HCA's during this time period**	X			

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
168.	192.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel. **---Staff verified personnel qualification: NACE ID#9820 Kevin O'Hogan expires Jan 31, 2018**	X			
169.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)*	X			
170.	192.491(c)	Do records document that each buried or submerged pipeline that **has been converted to gas service and was installed after July 31, 1971**, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? **---No Converted Pipeline**			X	
171.	192.491	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**) .465(a) **---Operator has reported no short sections**			X	
172.	192.491	Do records indicate the location of all items listed in 192.491(a)? **---Staff verified records**	X			
173.	192.491	Examination of Buried Pipe when Exposed .459 **---No buried pipe exposed during this time period**			X	
174.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed **---No exposed facilities where coating has been removed**			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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
175.	192.491	Rectifier Monitoring (**6 per yr/2½ months**) .465(b)	X			
176.	192.491	Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c) **---No Critical Interference Bonds**			X	
177.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c) **---No Non-Critical Interference Bonds**			X	
178.	192.491	Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? (**1 per 3 cal yr/39 months**) .465(e) **---No pipeline with no Cathodic Protection**			X	
179.	192.491	Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (**Including Casings**) .467	X			
180.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) **---Lamb Weston/BSW failed to complete remedial action within ninety days to correct a known CP deficiency**		X		
181.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched)	X			
182.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
183.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods **---No Casing installed prior to 1992**			X	
184.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days **---No Shorted Casing within this time period**			X	
185.	480-93-110(5)(c)	Casing shorts cleared when practical **---No Shorted Casing within this time period**			X	
186.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months **---No Shorted Casing within this time period**			X	
187.	192.491	Do records document that pipelines with cathodic protection have **electrical test leads installed** in accordance with requirements of Subpart I? (192.471; 192.469)	X			
188.	192.491	Do records document that the operator has minimized the detrimental effects of stray currents when found? .473	X			
189.	192.491	Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? .475(a) **---No Corrosive Gas**			X	
190.	192.491	Internal corrosion; Internal surface inspection; Pipe replacement .475(b) **---No Internal Corrosion found**			X	
191.	192.491	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems . (192.476(b); 192.476(c)) **---No new Construction**			X	
192.	192.491	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) .477 **---No Internal Corrosion found**			X	
193.	192.491	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481	X			
194.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions, Records adequate? .483/.485 **---No Replaced or Repaired pipe**			X	

Comments:

		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
195.	192.161	Supports and anchors	X			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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
196.	192.179	Valves installed as required? (Proper spacing, Readily accessible, Properly supported, Protection from Tampering/Damage, Blowdown-Discharge/Capacity)	X			
197.	480-93-015(1)	Odorization levels	X			
198.	192.463(a)	Levels of Cathodic Protection **--- Staff found a cathodic protection (CP) deficiency within the Lamb Weston/BSW CP survey records as well as later on at the same site, during the field inspection portion. Staff learned from NW Metal Fab Personnel that this CP site had been dropped from the survey. Staff informed personnel that once a test station location has been established there should be a valid explanation and documented records detailing the reason for any change to that location.**		X		
199.	192.465(b)	Rectifiers	X			
200.	192.467	CP - Electrical Isolation (192.467(a), (b), (c))	X			
201.	192.469	Test Stations (Sufficient Number).	X			
202.	192.476	Systems designed to reduce internal corrosion	X			
203.	192.479	Pipeline Components Exposed to the Atmosphere (192.479(a), (b), (c))	X			
204.	192.481	Atmospheric Corrosion – monitoring (192.481(b), (c))	X			
205.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) **---No Casing w/o vents installed after 1992**			X	
206.	192.605	Knowledge of Operating Personnel	X			
207.	192.613; .703	Pipeline condition, unsatisfactory conditions, hazards, etc. captured and addressed? (192.613(a), (b); 192.703(a), (b), (c))	X			
208.	480-93-124	Pipeline Markers: Placed and maintained at above/below ground facilities. Road and railroad crossings (192.707(a))	X			
209.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**) (192.719(a), (b)) **---No Pre-tested pipe**			X	
210.	192.739	Pressure Limiting and Regulating Devices (**Mechanical**) (spot-check field installed equipment vs. inspection records) (192.739(a), (b); 192.743) Gauge used to measure pressure was not calibrated.		X		
211.	192.743	Pressure Limiting and Regulating Devices (**Capacities**) (spot-check field installed equipment vs. inspection records)	X			
212.	192.745	Valve Maintenance: Field Inspection and partial operation (192.745(a), (b))	X			
213.	192.751	Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition. 192.7(a), (b), (c))	X			
214.	192.801 - 192.809	Operator qualification questions – Refer to OQ Field Inspection Protocol Form	X			

Operator Qualification Field Validation

Important: Per PHMSA, the OQ Field Inspection Protocol Form 15 (Rev 6-2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq **Date Form Completed/Uploaded?:**

Comments:

NW Metal Fab personnel seemed to not be cognizant of the AOC associated with a low CP read at a test station where there was obvious physical signs that the pipeline may have had excavation damage.

	COMPRESSOR STATIONS INSPECTION ---NO COMPRESSORS ON THIS PIPELINE SYSTEM (Note: Facilities may be "Grandfathered") **If not located on a platform check here and skip 192.167(c)**	S	U	N/A	N/C
192.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

	COMPRESSOR STATIONS INSPECTION ---NO COMPRESSORS ON THIS PIPELINE SYSTEM (Note: Facilities may be "Grandfathered") **If not located on a platform check here and skip 192.167(c)**	**S**	**U**	**N/A**	**N/C**
	Door latch must open from inside without a key			X	
	Doors must swing outward			X	
(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
	Each gate located within 200 ft of any compressor plant building must open outward			X	
	When occupied, the door must be opened from the inside without a key			X	
(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?**			X	
.165(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
.165(b)	Do the liquid separators have a manual means of removing liquids?			X	
	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
.167(a)	ESD system must:				
	- Discharge blowdown gas to a safe location			X	
	- Block and blowdown the gas in the station			X	
	- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
	- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
	ESD system must be operable from at least two locations, each of which is:				
	- Outside the gas area of the station			X	
	- Not more than 500 feet from the limits of the station			X	
	- ESD switches near emergency exits?			X	
.167 (b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
.167(c)	Are ESDs on platforms designed to actuate automatically by…				
	- For unattended compressor stations, when:				
	▪ The gas pressure equals MAOP plus 15%?			X	
	▪ An uncontrolled fire occurs on the platform?			X	
	- For compressor station in a building, when				
	▪ An uncontrolled fire occurs in the building?			X	
	▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to **NEC Class 1, Group D** is not a source of ignition)?			X	
.171(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
.173	Is each compressor station building adequately ventilated?			X	
.457	Is all buried piping cathodically protected?			X	
.481	Atmospheric corrosion control of aboveground facilities 192.481(b), (c); 192.479(a), (b), (c))			X	
.605	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? 192.605(b)(5)			X	
	Are facility maps current/up-to-date? 192.605(b)(3)			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

COMPRESSOR STATIONS INSPECTION ---NO COMPRESSORS ON THIS PIPELINE SYSTEM (Note: Facilities may be "Grandfathered") **If not located on a platform check here and skip 192.167(c)**		**S**	**U**	**N/A**	**N/C**
.616	Public Awareness Program effectiveness - Visit identified stakeholders as part of field inspection routine			X	
.605; .615(b)	Emergency Plan for the station on site?			X	
.707	Markers			X	
.199/.731	Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (192.199, 192.731(a), (b), (c))			X	
.735(a), (b)	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
	Are aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30?**			X	
.736(a), (b)	Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?			X	

Comments:

Alternative Maximum Allowable Operating Pressure
---This Operator does not use Alternative MAOP

For additional guidance refer to http://primis.phmsa.dot.gov/maop/faqs.htm
For Additional guidance see the FAQs at http://primis.phmsa.dot.gov/maop/faqs.htm

192.620	**Alternative MAOP Procedures and Verifications**	**S**	**U**	**N/A**	**N/C**
	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with: Class Location — Alternative Design Factor (F) 1 — 0.80 2 — 0.67 3 — 0.56				
.620(a)	(1) Establish alternative MAOP commensurate with class location – no class 4			X	
	(2) MAOP cannot exceed the lowest of the following:				
	(i) Design pressure of the weakest element			X	
	(ii) Test pressure divided by applicable factor			X	
.620(b)	(2) Pipeline constructed of steel pipe meeting additional requirements in §192.112.			X	
	(3) SCADA system with remote monitoring and control			X	
	(4) Additional construction requirements described in §192.328			X	
	(5) No mechanical couplings			X	
	(6) No failures indicative of systemic material fault – if previously operated at lower MAOP			X	
	(7) 95% of girth welds have NDT			X	
.620(c)	(1) PHMSA notified 180 days before operating at alternative MAOP			X	
	(2) Senior Executive signatures and copy to PHMSA			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C
	(4) Strength test per §192.505 or certify previous strength test			X	
	(6) Construction tasks treated as covered tasks for Operator Qualification			X	
	(7) Records maintained for life of system			X	
	(8) Class location change anomaly remediations			X	
620(d)	(1) Threat matrix developed consistent with §192.917			X	
	(2) Recalculate the potential impact circle per §192.903 and implement public education per §192.616			X	
	(3) Responding to an emergency in an HCA				
	(i) Identify HCAs using larger impact circle			X	
	(ii) Check personnel response times			X	
	(iii) Verify remote valve abilities			X	
	(iv) Verify line break valve control system			X	
	(4) Protect the right-of-way:				
	(i) ROW patrols 12 per year not to exceed 45 days			X	
	(ii) Plan to identify and mitigate unstable soil			X	
	(iii) Replace loss of cover if needed			X	
	(iv) Use line-of-sight markers per §192.707			X	
	(v) Review damage prevention program in light of national consensus practices			X	
	(vi) ROW management plan to protect against excavation activities			X	
	(5) Control Internal Corrosion:				
	(i) Program to monitor gas constituents			X	
	(ii) Filter separators if needed			X	
	(iii) Gas Monitoring equipment used			X	
	(iv) Cleaning pigs, inhibitors, and sample accumulated liquids				
.620(d)	(v) Limit CO2, H2S, and water in the gas stream			X	
	(vi) Quarterly program review based on monitoring results			X	
	(6) (i) Control interference that can impact external corrosion			X	
	(ii) Survey to address interference currents and remedial actions			X	
	(7) Confirm external corrosion control through indirect assessment			X	
	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months				
	(ii) Remediate damage with IR drop > 35%			X	
	(iii) Integrate internal inspection results with indirect assessment			X	
	(iv) Periodic assessments for HCAs			X	
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results				
	(8) Cathodic Protection			X	
	(i) Complete remediations within 6 months of failed reading				
	(ii) Confirm restoration by a close interval survey			X	
	(iii) Cathodic protection system operational within 12 months of construction completion			X	
	(9) Baseline assessment of integrity			X	
	(i)(A) Geometry tool run within 6 months of service				
	(i)(B) High resolution MFL tool run within 3 years of service			X	
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X	
	(iii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C
	(10) Periodic integrity assessments			X	
	(i) Frequency for assessments determined as if all segments covered by Subpart O				
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X	
	(11) Repairs			X	
	(i)(A) Use of the most conservative calculation for anomaly remaining strength				
	(B) Tool tolerances taken into consideration			X	
	(ii) Immediate repairs for:			X	
	(A) Dents meeting 309(b) criteria				
	(B) Defects meeting immediate criteria in §192.933(d)			X	
	(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X	
	(iii) Repairs within 1 year for:			X	
	(A) Defects meeting 1 year criteria in 933(d)				
	(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X	
	(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X	
	(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X	
	(1) Provide overpressure protection to a max of 104% MAOP			X	
.620(e)	Does the AMAOP process include overpressure protection requirements?			X	
	Do records indicate that overpressure protection requirements were met?			X	

Comments:

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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.

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

Number	Date	Subject
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
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.

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

Comments:

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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: