

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

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

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

Inspection Report			
Inspection ID/Docket Number	6777		
Inspector Name & Submit Date	Scott Rukke, Lead 9/7/16 Derek Norwood		
Chief Eng Name & Review/Date	Joe Subsits, 9/12/16		
Operator Information			
Name of Operator:	Cascade Natural Gas Corp	OP ID #:	2128
Name of Unit(s):	Walla Walla District Office		
Records Location:	Walla Walla		
Date(s) of Last (unit) Inspection:	October 14-18, 2013	Inspection Date(s):	Aug 1 - 4, 2016 Exit interview on 9/2/2016

Inspection Summary:

Conducted a review of operations, maintenance and emergency response records in the Walla Walla office and a review/inspection of certain field facilities including both regulator stations in Walla and College place, rectifiers, valves and CP test sites. All field facilities were good and employees performed OQ covered tasks adequately.

There are 5 violations noted based on leak survey issues and an unsubstantiated MAOP in the Walla Walla district.

HQ Address: 8113 W. Grandridge Blvd Kennewick, WA 99336	System/Unit Name & Address: Walla Walla District Office 324 Rose St Walla Walla, WA 99362-1847	
Co. Official: Eric Martuscelli Phone No.: 509-572-0294 Fax No.: 509-737-9803 Emergency Phone No.: 1-888-522-1130	Phone No.: 1-509-524-1880 Fax No.: 1-509-529-9733 Emergency Phone No.: 1-888-522-1130	
Persons Interviewed	Title	Phone No.
Denny Whitsett	District Manager	1-509-524-1882
Kevin McCallum	Pipeline Safety Specialist	1-509-736-5542
Jeff Staudenmaier	Director, Regions	1-541-706-6280
Chris Grissom	Pipeline Safety Specialist	1-541-706-6292
Mike Eutsey	Manager, Standards and Compliance	1-509-734-4576
Sarah Volk	Public Awareness Coordinator	1-509-734-4584

WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.
(check one below and enter appropriate date)

<input checked="" type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	June 18-21, 2012
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<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.) Portions done during unit inspections.	Date:	Longview 2016
<input checked="" type="checkbox"/>	OQ Program Review (PHMSA Form 14) Portions done during unit inspections.	Date:	Longview 2016

GAS SYSTEM OPERATIONS

Gas Supplier	Williams Pipeline		
Services: <i>Residential</i> 10,816 <i>Commercial</i> 1274 <i>Industrial</i> 19 <i>Other</i> 0			
Number of reportable safety related conditions last year None	Number of deferred leaks in system 6		
Number of <u>non-reportable</u> safety related conditions last year None	Number of third party hits last year 29		
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 0	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas) 237		
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Walla Walla (R-1)	Inlet 150, Outlet 60	144/55
Town:	College Place (R-2)	Inlet 150, Outlet 60	144/55
Other:	NA	NA	NA
Does the operator have any transmission pipelines?	None in Walla Walla		
Compressor stations? Use Attachment 1.	N/A		

Pipe Specifications:

Year Installed (Range)	1954 to Present	Pipe Diameters (Range)	½” to 8”
Material Type	Steel and PE	Line Pipe Specification Used	API 5L 3408 PE, 2406 MDPE, X42, X52, X46
Mileage	No Transmission 237 miles of main 179 miles of service	SMYS %	14.43%

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 4, May 2007) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at <http://primis.phmsa.dot.gov/oqdb/home.oq> **Date Completed/Uploaded** 08/16/2016

Integrity Management Field Validation

Important: Per PHMSA, IMP Field Verification Form (Rev 6/18/2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <http://primis.phmsa.dot.gov/gasimp/home.gim> **Date Completed/Uploaded:** N/A

NO TRANSMISSION in this unit.

PART 199 Drug and Alcohol Testing Regulations and Procedures

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	S	U	NA	NC
		X			

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	this portion of your inspection.				
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REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates. April 13, 2016.	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? Last submitted 2013. CP 780 states to submit at the request of the UTC.	X			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802 , or electronically at http://www.nrc.uscg.mil/nrchp.html , and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. None in this district.			X	
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline at unless an alternative reporting method is authorized IAW with paragraph (d) of this section. None in this district.			X	
5.	191.15(a)	30-day follow-up written reports to PHMSA (Form F7100.2) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov None in district.			X	
6.	191.15(c)	Supplemental report (to 30-day follow-up) None in district.			X	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2011 for the year 2010).	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 April 5, 2012. In CP 780	X			
9.	191.23	Filing the Safety Related Condition Report (SRCR) None in district.			X	

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REPORTING RECORDS			S	U	N/A	N/C
10.	191.25 49 U.S.C. 60139, Subsection (b)(2)	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery. Note: Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA on or before the fifth day following the date on which the exceedance occurs. The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <ul style="list-style-type: none"> • The name and principal address of the operator date of the report, name, job title, and business telephone number of the person submitting the report. • The name, job title, and business telephone number of the person who determined the condition exists. • The date the condition was discovered and the date the condition was first determined to exist. • The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored. • The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action. <p>None in district.</p>			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions CP 780.	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections No offshore pipelines.			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports No abandoned pipelines.			X	
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which results in; None in district.				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None in district			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; None in district.			X	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; 3 in 2015 3 in 2016 0 in 2014	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas; None in district			X	
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; 1 in 2016	X			
20.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; None in district.			X	
21.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; None in district.			X	
22.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				

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23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; None in district.			X	
24.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; None in district.			X	
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or None in district.			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP None in district.			X	
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	X			
29.	480-93-200(4)(b)	The extent of injuries and damage;	X			
30.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;	X			
31.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;	X			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	X			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			
37.	480-93-200(4)(j)	Line type;	X			
38.	480-93-200(4)(k)	City and county of incident; and	X			
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	X			
41.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure CP 780	X			
42.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form) CP 835				
43.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) CP 780 We would need to verify this through DIRT after looking through some damage reports. Reviewed dirt report 2329650	X			
44.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed?	X			

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45.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? Note: Records maintained for two years and made available to the commission upon request. CNG uses CNG 835	X			
46.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
47.	480-93-200(8)(a)	<ul style="list-style-type: none"> • Notification requirements for excavators under RCW 19.122.050(1) CP 835 8.46 Reviewed a sampling of notices sent to excavators.	X			
48.	480-93-200(8)(b)	<ul style="list-style-type: none"> • A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and CP 835. Reviewed letter.	X			
49.	480-93-200(8)(c)	<ul style="list-style-type: none"> • Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. CP 835. Reviewed letter.	X			
50.	480-93-200(9)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a) • A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) CP 835. None of these occurred in this district.			X	
51.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
52.	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
53.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. Submitted 3/15/2016 for 2015.	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 CP 780 CP 500 Public Awareness	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
57.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator CP 780 Notices sent for all “new” customers. This is on the back of each bill.	X			
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? CP 601 and 647 verify if the 20 psig is correct in cp 647.051 Reason - was that the 20 psig systems can drop below the 10 psig. Issued a MOC to determine if it is necessary to keep the 20psig and CNG revised this procedure while we were on site.	X			
59.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? CP 601 and 647	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
60.	480-93-013	OQ records for personnel performing New Construction covered tasks Reviewed the OQ records for all district employees and they were all current. Will review and compare to maintenance records.	X			
61.	192.225	Test Results to Qualify Welding Procedures. Procedures are company wide. CNG uses the manufacturers procedures. These were reviewed in a separate unit inspection.				X
62.	192.227	Welder Qualification	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) All API 1104.			X	
64.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	X			
65.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period The underlying CFR rule (192.285) that this requirement was based on has changed and we should remove this question and revise our WAC rule when reopened. We need to revise 480-93-080 2C and 3.			X	
66.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) See above.			X	
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 CP 605	X			
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains Reviewed through crew inspections. CP 607 605 and 645	X			
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
70.	192.241(a)	Visual Weld Inspector Training/Experience CP 760 Reviewed a large 8-inch high pressure reinforcement job. CNG used a contractor for NDT. He was a level II radiographer.	X			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
71.	192.243(b)(2)	Nondestructive Technician Qualification CNG uses NW Inspection.	X			
72.	192.243(c)	NDT procedures CP 760	X			
73.	192.243(f)	Total Number of Girth Welds	X			
74.	192.243(f)	Number of Welds Inspected by NDT 25 welds total 16 welds inspected by NDT None rejected.	X			
75.	192.243(f)	Number of Welds Rejected None rejected			X	
76.	192.243(f)	Disposition of each Weld Rejected None rejected.			X	
77.	.273/.283	Qualified Joining Procedures Including Test Results CNG uses the manufacturers fusion procedures. CP 607 states they may use the manufacturers procedures or qualify their own meeting the requirements in Part 192.	X			
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93- 178(4)(5)	Underground Clearances Reviewed through crew inspections.	X			
80.	192.327	Amount, location, cover of each size of pipe installed Reviewed through crew inspections.	X			
81.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length No transmission in district.			X	
82.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: No transmission in district.			X	
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; No transmission in district.			X	
84.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. No transmission in district.			X	
85.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed No transmission in district.			X	
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; No transmission in district.			X	
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. No transmission in district.			X	
88.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; No transmission in district.			X	
89.	480-93-160(2)(g)	Welding specifications; and No transmission in district.			X	
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. No transmission in district.			X	
91.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress $\geq 20\%$ SMYS? No transmission in district.			X	
92.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) Reviewed records for a high pressure reinforcement and a new construction plat. Records were good.	X			
93.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? None in district in the records we reviewed.			X	

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94.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Calibration records for the tests we reviewed were good.	X			
95.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig None in district.			X	
96.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig None in district.			X	

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
97.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline	X			
98.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	X			
99.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09 CP 780	X			
100.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel All field employees have laptops with GIS.	X			
101.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? Reviewed a sampling of asbuilts and they were mapped within 6 months.	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures CNG uses Form CNG-640 to conduct periodic crew inspections.	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures	X			
104.	192.609	Class Location Study (If applicable) This applies to facilities operating over 40%. There is nothing operating over 20% in Walla Walla so this is not applicable in this district.			X	
105.	192.611	Confirmation or revision of MAOP Not applicable in this district.			X	
106.	192.614	Damage Prevention (Operator Internal Performance Measures)				
107.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)	X			
108.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? Performed in house.			X	
109.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? Performed in house.			X	

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110.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
111.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. CP 835	X			
112.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
113.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? Reviewed the OQ records for the three employees that had completed locates in the Walla Walla District.	X			
114.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys? CP 835	X			

Comments:

115.		Emergency Response Plans	S	U	N/A	N/C
116.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response	X			
117.	192.615(b)(1)	Location Specific Emergency Plan	X			
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training CP 925 requires two mock drills per year as of 2016. One drill was conducted in January 2016.	X			
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. CNG form 234, CP 925 Reviewed a sampling.	X			
120.	192.615(c)	Liaison Program with Public Officials	X			
121.	192.616	Public Awareness Program				
122.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). CP 925 and in CP 500 See table below:	X			

**Utilities and Transportation Commission
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123.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.	X				
124.		API RP 1162 Baseline* Recommended Message Deliveries					
125.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	Annual				
		LDC Customers	Twice annually				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual GOOD				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		TRANSMISSION SHOULD BE REMOVED					
		Stakeholder Audience (Transmission line operators)		Baseline Message Frequency (starting from effective date of Plan)			
		Residence Along Local Distribution System	2 years				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
126.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.					
127.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.	X				
128.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 . .616(h) Last reviewed, June 2014	X				
129.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. Not applicable.			X		
130.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10) CP 722 None in district since last inspection.			X		

Comments:

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131.	192.619/621/623	<p>Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08) CP 604 and 665</p> <p>Operator was unable to substantiate the MAOP of a 1956 main. No pressure test records were available and documentation for an uprate were unavailable. Highest operating pressure in the 5 year window prior to 1970 was 38 psig. CNG indicated the system had a 60 psig maop and it was operating at approximately 57 psig during our field visit.</p>	X			
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing Reviewed all reads from 2015, 2015 and 2016	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements None in district.			X	
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Two instruments reviewed.	X			
136.	480-93-124(3) This code is one number off.	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months)	X			
137.	480-93-124(4) This code is one number off.	Markers reported missing or damaged replaced within 45 days?	X			
138.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on Reviewed a sampling of meter turn-ons. CP 684	X			
139.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None since last inspection.			X	
140.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	X			
141.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; None in district.			X	
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? None in district.			X	
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair?	X			
144.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	X			
145.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X			
146.	480-93-188(1)	Gas leak surveys	X			

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147.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X															
148.	480-93-188(3)	Leak survey frequency (Refer to Table Below) <u>Some leak frequencies were exceeded in both residential areas and business districts. See violation report.</u>		X														
<table border="1"> <tr> <td>Business Districts (implement by 6/02/07)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>High Occupancy Structures</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Pipelines Operating ≥ 250 psig</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Other Mains: CI, WI, copper, unprotected steel</td> <td>2/yr (7.5 months)</td> </tr> </table>							Business Districts (implement by 6/02/07)	1/yr (15 months)	High Occupancy Structures	1/yr (15 months)	Pipelines Operating ≥ 250 psig	1/yr (15 months)	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)				
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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)																	
149.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs	X															
150.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred	X															
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected None in district.			X													
152.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions None in district.			X													
153.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. <u>No record of a leak survey to tie in on Leak Work Order 209555. 267 Whistling Duck in Walla Walla. Violation written.</u>		X														
154.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f)	X															
155.	480-93-188(6)	Leak program - Self Audits Reviewed the 12/11/2014.	X															
156.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 REMOVE TRANSMISSION.				X												
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
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4	4/yr (4½ months)	4/yr (4½ months)																
157.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 NO TRANSMISSION REVIEWED DURING DISTRICT INSPECTIONS.				X												
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr	7½ months																
4	4/yr	4½ months																
158.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1)	X															
159.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	X															
160.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) Violation written.		X														

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161.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> • Outside Business District (5 years) • Cathodically unprotected distribution lines (3 years) Violation written.		X		
162.	192.603(b)	Tests for Reinstating Service Lines 192.725	X			
163.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 None in district			X	
164.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X			
165.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X			
166.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 No transmission in this district. REMOVE			X	
167.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	X			
168.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X			
169.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 No vaults over 200’.			X	
170.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 None during this inspection.			X	
171.	192.603(b)	Welding – Procedure 192.225(b) On site during previous crew inspections.	X			
172.	192.603(b)	Welding – Welder Qualification 192.227/.229	X			
173.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) Records reviewed.	X			
174.	192.709	NDT Records (pipeline life) .243(f)	X			
175.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	X			
176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area’s (HCA’s) Transmission. Remove.			X	

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
177.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) CP 755	X			
178.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)	X			
179.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	X			
180.	192.491	Test Lead Maintenance .471 CP 610	X			
181.	192.491	Maps or Records .491(a)	X			
182.	192.491	Examination of Buried Pipe when exposed .459	X			
183.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
184.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X			
185.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
186.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) None in district.			X	
187.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) None in district.			X	
188.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
189.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation.	X			
190.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) None in district.			X	
191.	192.491	Electrical Isolation (Including Casings) .467	X			
192.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
193.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	X			
194.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days	X			
195.	480-93-110(5)(c)	Casing shorts cleared when practical Retired.	X			
196.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months	X			
197.	192.491	Interference Currents .473 None in district.			X	
198.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) None in district.			X	
199.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	X			
200.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 No coupons in district.			X	
201.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481	X			
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	X			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
203.	192.161	Supports and anchors	X			
204.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	X			
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	X			
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	X			
207.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed.	X			
208.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified?	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
209.	480-93-015(1)	Odorization Not checked, no odorant meter was available in this district at the time of the inspection.				X
210.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
211.	192.179	Valve Protection from Tampering or Damage	X			
212.	192.455	Pipeline coatings meet requirements of 192.461 <i>(for buried pipelines installed after 7/31/71)</i>	X			
213.	192.463	Levels of cathodic protection	X			
214.	192.465	Rectifiers	X			
215.	192.467	CP - Electrical Isolation	X			
216.	192.476	Systems designed to reduce internal corrosion No new systems after code change.			X	
217.	192.479	Pipeline Components exposed to the atmosphere	X			
218.	192.481	Atmospheric Corrosion: monitoring	X			
219.	192.491	Test Stations – Sufficient Number .469	X			
220.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
221.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
222.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	X			
223.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
224.	192.605	Knowledge of Operating Personnel	X			
225.	480-93-124	Pipeline markers	X			
226.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
227.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) None in district.			X	
228.	192.195	Overpressure protection designed and installed where required?	X			
229.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			
230.	192.741	Telemetry, Recording Gauges None reviewed.			X	
231.	192.751	Warning Signs None required during this inspection.			X	
232.	192.355	Customer meters and regulators. Protection from damage	X			
233.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	X			
234.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
235.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) Looked at pipe storage in Walla Walla yard.	X			
236.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	X			
237.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
238.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No X				
239.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?			X	
240.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the			X	

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		deadline?				
241.	192.745	Valve Maintenance (Transmission) Transmission Remove.			X	
242.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited: See field form.

Facility Type	Facility ID Number	Location

Comments:
See field form.

Recent Gas Pipeline Safety 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-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)

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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

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

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
243.	.605(b)					
244.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			x	
245.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			x	
246.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			x	
247.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			x	
248.		(b) Tank must be protected according to NFPA #30			x	
249.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			x	
250.		• 50% of the upright side areas are permanently open, or			x	
251.		• It is an unattended field compressor station of 1000 hp or less			x	

Comments:
No transmission in this district.

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

Comments:
No compression in this district.

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

Attachment 1

Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
264.		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			x	
265.	.167 (a)	ESD system must:				
266.		- Discharge blowdown gas to a safe location			x	
267.		- Block and blow down the gas in the station			x	
268.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x	
269.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			x	
270.		ESD system must be operable from at least two locations, each of which is:				
271.	.167	- Outside the gas area of the station			x	
272.		- Not more than 500 feet from the limits of the station			x	
273.		- ESD switches near emergency exits?			x	
274.	(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			x	
275.	(c)	Are ESDs on platforms designed to actuate automatically by...				
276.		- For unattended compressor stations, when:				
277.		▪ The gas pressure equals MAOP plus 15%?			x	
278.		▪ An uncontrolled fire occurs on the platform?			x	
279.		- For compressor station in a building, when				
280.		▪ An uncontrolled fire occurs in the building?			x	
281.		▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?			x	
282.	.171 (a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			x	
283.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			x	
284.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			x	
285.	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			x	
286.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			x	
287.	.173	Is each compressor station building adequately ventilated?			x	
288.	.457	Is all buried piping cathodically protected?			x	
289.	.481	Atmospheric corrosion of aboveground facilities			x	
290.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			x	
291.		Are facility maps current/up-to-date?			x	
292.	.615	Emergency Plan for the station on site?			x	
293.	.619	Review pressure recording charts and/or SCADA			x	
294.	.707	Markers			x	
295.	.731	Overpressure protection – relief’s or shutdowns			x	
296.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			x	
297.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			x	

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
298.	.736	Gas detection – location			x	

Comments:
No compression in this district.