# Inspection Output (IOR)

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## **Inspection Information**

Inspection Name 2018 Standard and PA - Lamb

Weston/BSW
Status PLANNED
Start Year 2018
System Type GT
Protocol Set ID GT.2018.01

Operator(s) LAMB WESTON/BSW (32560)

Lead David Cullom
Observer(s) Denise Crawford
Supervisor Joe Subsits
Director Sean Mayo

Plan Submitted 04/26/2018

Plan Approval 04/30/2018 by Joe Subsits

All Activity Start 05/07/2018
All Activity End 05/09/2018

Inspection Submitted -Inspection Approval --

#### **Inspection Summary**

This inspection consisted of a Public Awareness (PA) and a Standard Inspection for Lamb Weston/BSW. A records review and a field inspection were conducted. For the field portion, the two jurisdictional pressure reliefs were tested in place, main run regulators checked for proper operation, emergency valves were operated, odorant levels and concentrations were checked, and the CP system was also checked to ensure adequate cathodic protection. There were no probable violations or items of concern.

The Lamb Weston/BSW intrastate transmission line consists of 19,200'of 6.625" O.D. X46 0.188 WT pipe and 2660' of Grade B 0.237 WT 4.500" O. D. pipe. Lamb Weston is using a factor of 0.60 for its design formula to determine percent specified minimum yield strength (SMYS) due to the lack of casings used in its design. Williams provides natural gas at 700-800 PSIG to the inlet (MAOP 840) of Regulator R46. Regulator R46 outlet MAOP is 150 PSIG with a working pressure of 140 PSIG. The pipeline operates at a pressure of 140 PSIG from the Gate Station to the Lamb Weston / BSW LLC, property where the plant main regulator station is located. The gas line is then operated at a MAOP of 110 PSIG and a MOP of 100 PSIG to the regulator station located within the plant. The 6" pipeline %SMYS=10.4% The 4" line %SMYS=14.74%. The test pressure was 225 PSIG.

From R46 the pipeline crosses under Road 6 (North) and turns West to parallel Road 6 on the North side. The 6-inch pipeline continues west to just east of the intersection with County Line Road. The pipeline goes under Road 6 again and travels south on the east side of County Line Road. When the pipeline comes even with the R26 regulator just past Basin Street the pipeline turns under County Line Road and enters the regulator station on the NE corner of the intersection.

# Scope (Assets)

# Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	Unspecified label	unit	86294	GOM Offshore OCS Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line Cast or Ductile Iron Copper Pipe Aluminum pipe AMAOP CDA Abandoned	164	164	164	100.0%

a. Percent completion excludes unanswered questions planned as "always observe".

#### **Plans**

# Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	n/a	PD	R, O	Detail
2.	n/a	MO	R, O	Detail
3.	n/a	TD.ATM	R, O	Detail
4.	n/a	TD.CPMONITOR	R, O	Detail
5.	n/a	TD.CP	R, O	Detail
6.	n/a	TD.COAT	R, O	Detail
7.	n/a	TD.ICP	R, O	Detail
8.	n/a	TD.SCC	R	Detail
9.	n/a	RPT.NR	R	Detail
10.	n/a	RPT.RR	R	Detail
11.	n/a	MO.GO.OMANNUALREVIEW.P	P, R, O, S	Detail
12.	Core	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail
13.	n/a	PD.PA	P, R, O, S	Detail
14.	n/a	EP.ERG	P, R, O, S	Detail
15.	n/a	FS.VA.CMPVLVMAINT.O	P, R, O, S	Detail
16.	n/a	FS.VA.CMPVLVMAINT.O	P, R, O, S	Detail
17.	n/a	AR.RMP.SAFETY.P		Detail
18.	n/a	AR.RMP.SAFETY.O	P, R, O, S	Detail
19.	n/a	AR.RMP.IGNITION.P		Detail
20.	n/a	AR.RMP.IGNITION.R	P, R, O, S	Detail
21.	n/a	AR.RMP.REPAIRREQT.P		Detail
22.	n/a	AR.RMP.REPAIRREQT.P		Detail
23.	n/a	MO.GOCLASS.CLASSLOCATEREV.P		Detail
24.	n/a	MO.GOCLASS.CLASSLOCATESTUDY.P		Detail
25.	n/a	PD.DP.PDPROGRAM.P	P, R, O, S	Detail
26.	n/a	PD	P, R, O, S	Detail
27.	n/a	TQ.PROT9.CORRECTION.O	P, R, O, S	Detail
28.	n/a	TQ.PROT9.AOCRECOG.O	P, R, O, S	Detail
29.	n/a	TQ.PROT9.VERIFYQUAL.O	P, R, O, S	Detail
30.	n/a	TQ.PROT9.QUALIFICATIONSTATUS.O	P, R, O, S	Detail
31.	n/a	TQ.PROT9.TASKPERFORMANCE.O	P, R, O, S	Detail

# **Plan Implementations**

										Required
			Focus	Involved		Qst			Total	%
	SMAR	<b>Start Date</b>	Directive	Groups/Subgroup	Asset	Type(s	Planne	Require	Inspecte	Complet
# Activity Name	T Act#	End Date	S	S	S	)	d	d	d	е
1 Records and Fiel . d		05/07/201 8 05/09/201 8	n/a	all planned questions		all types	164	164	164	100.0%

a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

# **Forms**

 $b.\ Percent\ completion\ excludes\ unanswered\ questions\ planned\ as\ "always\ observe".$ 

No. Entity Form Name Status Date Completed Activity Name Asset

1. Attendance List Records and Field Review Attendance

COMPLETED 05/14/2018

Records and Field

## Results (all values, 164 results)

175 (instead of 164) results are listed due to re-presentation of questions in more than one sub-group.

#### AR.IL: In-Line Inspection (Smart Pigs)

1. Question Result, ID, NA, AR.IL.ILIVALIDATE.R, 192.947(g) (192.921(a)(1))

Question Text Do records demonstrate that the operator has validated ILI assessment results per their process? Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

#### AR.RC: Repair Criteria

2. Question Result, ID, NA, AR.RC.SCHEDULEIMPL.R, 192.947(f) (192.933(d))

Question Text Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

#### **AR.RMP: Repair Methods and Practices**

3. Question Result, ID, Paferences Sat, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))

Question Text Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?

Assets Covered

Result Notes For example, the operator has standard safe electrical operating practices for CP system repairs. Additionally, the operator has procedures for hot work - if needed.

4. Question Result, ID, NA, AR.RMP.SAFETY.O, 192.605(b)(9) (192.713(b))

Question Text Are repairs made in a safe manner and to prevent damage to persons and property?

Assets Covered

Result Notes No such activity/condition was observed during the inspection. The operator indicated they replaced a rectifier stack following their standard safe electrical operating practices.

5. Question Result, ID, Peterpres Sat, AR.RMP.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))

Question Text Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?

Result Notes Section 16.0 in the O&M contains this. No hot work has been performed since the last audit.

6. Question Result, ID, NA, AR.RMP.IGNITION.R, 192.751(a) (192.751(b), 192.751(c))

Question Text Do records indicate adequate steps were taken by the operator to prevent accidental ignition prior to performing work?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

7. Question Result, ID, Sat, AR.RMP.REPAIRREQT.P, 192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))
References

Question Text Does the repair process capture the requirements of 192.711 for transmission lines? Assets Covered

Result Notes This is in the O&M Section Section 8.03 part E.

8. Question Result, ID, NA, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-References 2004 Section 7)

Question Text From the review of records, were all repairs performed in accordance with processes, applicable sections of 49 CFR Parts 192 and the guidance of ASME B31.8S-2004, Section 7, and the Pipeline Repair Manual, Revision 5?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No leak repairs.

9. Question Result, ID, NA, AR.RMP.REPAIRQUAL.R, 192.807(b) (192.805(h))

Question Text From the review of selected records, were personnel performing repairs, other than welding, and post repair tests qualified for the task they performed?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. They only had a rectifier repair.

10. Question Result, ID, Sat, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)

Question Text From the review of records, were any components that were replaced constructed to the same or higher standards as the original component?

Assets Covered

Result Notes They repaired the rectifier with new diode stack and re-certified the unit upon repair.

#### **EP.ERG: Emergency Response**

11. Question Result, ID, Sat, EP.ERG.REVIEW.P, 192.605(a) References

Question Text Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?

**Assets Covered** 

Result Notes Section 5.14 (OM) 5.15 (OQ) 5.16 (PA)

12. Question Result, ID, References Sat, EP.ERG.REVIEW.R, 192.605(a)

Question Text Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?

Assets Covered

Result Notes This is in the procedural manual for the update log. They have a sheet OM, OQ, and PA. I reviewed

13. Question Result, ID, Sat, EP.ERG.LOCATION.O, 192.615(b)(1)

Question Text Are supervisors provided the applicable portions of the emergency plan and procedures?

**Assets Covered** 

Result Notes The manual is contained on site and it is contained in engineering.

14. Question Result, ID, Sat, EP.ERG.INCIDENTDATA.P, 192.605(b)(4)

Question Text Does the process include the steps necessary for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner?

Assets Covered

Result Notes Section 8.13b First contact UTC line within 1 hour.

15. Question Result, ID, References Sat, EP.ERG.NOTICES.P, 192.615(a)(1)

Question Text Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?

Assets Covered

Result Notes Section 8.01 (B) 1-7

16. Question Result, ID, NA, EP.ERG.NOTICES.R, 192.615(a)(1)

Question Text Do records indicate receiving, identifying, classifying and communication of notices of events requiring immediate response in accordance with procedures?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

17. Question Result, ID, Sat, EP.ERG.COMMSYS.P, 192.615(a) (192.615(a)(2))
References

Question Text Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?

Assets Covered

Result Notes 8.04 contains a step by step checklist.

18. Question Result, ID, Sat, EP.ERG.RESPONSE.P, 192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))
References

Question Text Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?

Assets Covered

Result Notes This is item 10 in the Section 8.04 checklist.

19. Question Result, ID, Sat, EP.ERG.READINESS.P, 192.615(a) (192.615(a)(4))
References

Question Text Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?

**Assets Covered** 

Result Notes This is item 3 and 4 (repair crew) in the Section 8.04 checklist.

20. Question Result, ID, References NA, EP.ERG.READINESS.O, 192.615(a)(4)

Question Text Are personnel, equipment, tools, and materials needed at the scene of an emergency available as required by its procedures?

Assets Covered

Result Notes No such activity/condition was observed during the inspection.

21. Question Result, ID, References Sat, EP.ERG.PUBLICPRIORITY.P, 192.615(a) (192.615(a)(5))

Question Text Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?

Assets Covered

Result Notes This is item 1 in the Section 8.04 checklist.

22. Question Result, ID, Sat, EP.ERG.PRESSREDUCESD.P, 192.615(a) (192.615(a)(6))
References

Question Text Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?

Assets Covered

Result Notes This is item 6 in the Section 8.04 checklist. 8.07 has step by step procedures and pictures.

23. Question Result, ID, Sat, EP.ERG.PUBLICHAZ.P, 192.605(a) (192.615(a)(7))

Question Text Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?

Assets Covered

Result Notes This is item 7 and 8. Item 9 has LOTO procedures in the Section 8.04 checklist.

24. Question Result, ID, References References Sat, EP.ERG.AUTHORITIES.P, 192.615(a) (192.615(a)(8))

Question Text Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?

Assets Covered

Result Notes This is item 2 in the Section 8.04 checklist.

25. Question Result, ID, Sat, EP.ERG.OUTAGERESTORE.P, 192.615(a) (192.615(a)(9)) References

Question Text Does the emergency plan include procedures for safely restoring any service outage?

Assets Covered

Result Notes This is in Section 21 for returning to service. Startup/Shutdown/Blowdown.

26. Question Result, ID, Sat, EP.ERG.INCIDENTACTIONS.P, 192.615(a) (192.615(a)(10))

Question Text Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?

Assets Covered

Result Notes Section 11.2 item 3 contains this procedure.

27. Question Result, ID, Sat, EP.ERG.INCIDENTANALYSIS.P, 192.617 References

Question Text Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?

Assets Covered

Result Notes SEC 11.2 item 3 in the O&M.

28. Question Result, ID, NA, EP.ERG.INCIDENTANALYSIS.R, 192.605(a) (192.617)

Question Text Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

29. Question Result, ID, Sat, EP.ERG.POSTEVNTREVIEW.P, 192.615(b)(3)

Question Text Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?

Assets Covered

Result Notes O&M 8.04 item 14

30. Question Result, ID, NA, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

31. Question Result, ID, Sat, EP.ERG.LIAISON.P, 192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03)

Question Text Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?

Assets Covered

Result Notes Section 8.0 E contains the procedure.

32. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also presented in: PD.PA)

Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

Assets Covered

#### IM.CA: Continual Evaluation and Assessment

33. Question Result, ID, NA, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c)) References

Question Text Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

#### IM.PM: Preventive and Mitigative Measures

34. Question Result, ID, NA, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a)) References

> Question Text Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

#### MO.GC: Conversion to Service

35. Question Result, ID, NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b))

Question Text Do records indicate the process was followed for converting any pipelines into Part 192 service? Assets Covered

Question Text Did personnel respond to indications of abnormal operations as required by the process?

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

#### MO.GOABNORMAL: Gas Pipeline Abnormal Operations

36. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))

Result Notes They pulled a rectifier report for a routine inspection. The rectifier was not reporting good readings so they replaced it.

37. Question Result, ID, NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4)) References

> Question Text Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review. They haven't employee caused AOCs. They perform annual work reviews.

#### MO.GOCLASS: Gas Pipeline Class Location

38. Question Result, ID, NA, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), References 192.611(d))

Question Text Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review. They monitor for class location changes in Section 3.5 D of the O&M.

- 39. Question Result, ID, NA, MO.GOCLASS.CLASSLOCATEREV.R, 192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), References 192.611(d))
  - Question Text Was the MAOP in a pipeline segment confirmed or revised within 24 months as required?

Assets Covered

- Result Notes No such event occurred, or condition existed, in the scope of inspection review. No class locations have changed.
- 40. Question Result, ID, Sat, MO.GOCLASS.CLASSLOCATEREV.O, 192.611(a)

Question Text Are current ROW conditions and class locations consistent?

Assets Covered

Result Notes Yes, The ROW condition has not changed in several audit cycles.

- 41. Question Result, ID, Sat, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), References 192.609(d), 192.609(e), 192.609(f))
  - Question Text Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?

**Assets Covered** 

Result Notes Section 3.5 D contains this and Section 6.1.

- 42. Question Result, ID, NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), References 192.609(d), 192.609(e), 192.609(f))
  - Question Text 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?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

- 43. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also References presented in: MO.GO)
  - Question Text Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?

**Assets Covered** 

Result Notes Marvin conducts a least weekly patrols and has records. I reviewed the 2017 patrols.

- 44. Question Result, ID, NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also References presented in: MO.GO)
  - Question Text Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

#### MO.GOMAOP: Gas Pipeline MAOP

- 45. Question Result, ID, Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b))
  - Question Text Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?

**Assets Covered** 

Result Notes Section 12 and Section 4.105 contains MAOP info.

- 46. Question Result, ID, NA, MO.GOMAOP.MAOPLIMIT.R, 192.603(b) (192.605(b)(5))
  - Question Text Do records indicate operation within MAOP limits, plus the build-up allowed for operation of pressurelimiting and control devices, was assured while starting up and shutting down any part of the pipeline?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The pipeline has not been shutdown since the previous inspection.

#### MO.GM: Gas Pipeline Maintenance

47. Question Result, ID, Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also References presented in: MO.GMOPP)

Question Text 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?

Assets Covered

Result Notes I reviewed EPCRs, patrols, and they are keeping complete records. There have been no welding repairs during this inspection time period.

48. Question Result, ID, NA, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))

Question Text Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No hot tapping. When they blow down

49. Question Result, ID, Sat, MO.GM.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))

Question Text Are the operator's precautionary measures adequate on a gas transmission line where there exists the potential for accidental ignition?

Assets Covered

Result Notes There is adequate signage, markers, and they do not have areas in their system that can cause an unsafe accumulation of gas.

50. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))

Question Text 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?

**Assets Covered** 

Result Notes I checked records back to 2016. They have 5 Emergency Valves.

51. Question Result, ID, Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))
References

Question Text Are field inspection and partial operation of transmission line valves adequate?

**Assets Covered** 

Result Notes No issues

#### MO.GOODOR: Gas Pipeline Odorization

52. Question Result, ID, Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), References 192.625(e), 192.625(f))

Question Text Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?

Assets Covered

Result Notes Section 5.10 has monthly odorization time frames. They had OQ records for Vadim and 5-31-16 was his OQ qual date. Checked all records baclk to 2016.

53. Question Result, ID, Sat, MO.GOODOR.ODORIZE.O, 192.625(f)

Question Text Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?

**Assets Covered** 

Result Notes No issues - refer to field notes for detection levels.

#### MO.GO: Gas Pipeline Operations

54. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also References presented in: MO.GOCLASS)

Question Text Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?

Assets Covered

Result Notes Marvin conducts a least weekly patrols and has records. I reviewed the 2017 patrols.

55. Question Result, ID, NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also References presented in: MO.GOCLASS)

Question Text Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

56. Question Result, ID, Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)

Question Text Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?

Assets Covered

Result Notes The Procedural Manual Update Log states: "This manual must be reviewed and updated at least once each calendar year, and at intervals not to exceed 15 months."

57. Question Result, ID, Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a) References

> Question Text Has the operator conducted annual reviews of the written procedures or processes in the manual as required?

Assets Covered

Result Notes Reviewed By:

Jason Wingate

Date:

3/26/2018

Reviewed By:

Jason Wingate

Date:

5/25/2017

Reviewed By:

Jason Wingate

Date:

6/1/2016

58. Question Result, ID, Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))

Question Text Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?

Assets Covered

Result Notes This is a following example of the review of the pipeline work being performed. Field observations and work is reviewed by Marvin Price.

**RIGHT-OF-WAY INSPECTION** 

Applicable Code: 192.705

Lamb Weston / BSW LLC.

Warden, Washington

Right of Way Inspection

Changes: None

**Road Crossing Inspection** 

Changes: All road crossings are in good condition with no conditions of concern.

Significant Changes in Surface Features:

There are two large holes over the gas line east of the feed lot. The largest one is about 4' long x 2'

wide x 3' deep and these should be filled in. There are also some areas just south of the slough that are

starting to sink due to the harsh winter and should be monitored. (See attached pictures for better site

location and size.

Inspected By: Brian Yechout and Jason Wingate

Date Inspected: 02-23-17

Reviewed By: Marvin Price

59. Question Result, ID, Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))

Question Text Are construction records, maps and operating history available to appropriate operating personnel? Assets Covered

Result Notes They are all contained in the office building located on site.

60. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)

Question Text Are construction records, maps and operating history available to appropriate operating personnel? Assets Covered

Result Notes They are all contained in the office building located on site.

61. Question Result, ID, Sat, MO.GO.OMLOCATION.O, 192.605(a) References

Question Text Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?

Assets Covered

Result Notes They are in the engineering room at the plant.

62. Question Result, ID, NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))

Question Text Do records indicate the pressure uprating process was implemented per the requirements of 192.553?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. This is in 4.553 - No uprates will occur.

#### MO.GMOPP: Gas Pipeline Overpressure Protection

63. Question Result, ID, Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Question Text Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?

Assets Covered

Result Notes Section 4.195 addresses the upstream MAOP testing for a Williams regulator failure. There have been no system additions or deletions. The device is tested annually.

2/25/16

5/18/17

5/7/18 This was performed while I was on site. The pressures and relief values were verified.

64. Question Result, ID, Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also References presented in: MO.GM)

Question Text 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?

**Assets Covered** 

Result Notes I reviewed EPCRs, patrols, and they are keeping complete records. There have been no welding repairs during this inspection time period.

65. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?

Assets Covered

Result Notes I checked 2016 and 2017.

66. Question Result, ID, Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)

Question Text Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?

**Assets Covered** 

Result Notes Brian performed. No issues.

#### MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

67. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text Does the process adequately cover the requirements for patrolling the ROW and conditions reported? Assets Covered

Result Notes Section 5.02 contains this.

68. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text Do records indicate that ROW surface conditions have been patrolled as required?

Assets Covered

Result Notes I looked at the weekly patrols going back to 2016. Brian conducts those patrols quarterly and I reviewed several

69. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References PD.RW) Question Text Does the process adequately cover the requirements for placement of ROW markers? Assets Covered Result Notes This is in the O&M 5.05 E. 70. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References PD.RW) Question Text Are line markers placed and maintained as required? Assets Covered Result Notes No issues with markers or signage 71. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW) Question Text Are the ROW conditions acceptable for the type of patrolling used? Assets Covered Result Notes OK 72. Question Result, ID, Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d)) Question Text Do records indicate leakage surveys conducted as required? Assets Covered Result Notes I reviewed 2-25-16, 05-31-16, 2-27-2017, 8-24-17, 2-22-2018, and the latest one is not yet complete. 73. Question Result, ID, NA, MO.RW.LEAKAGE.O, 192.706 (192.706(a), 192.706(b)) References Question Text Are leakage surveys being implemented as required? Assets Covered Result Notes No such activity/condition was observed during the inspection. 74. Question Result, ID, NA, MO.RW.LEAKAGE30SMYS.R, 192.935(d) (192.935(b)(1)(i), 192.935(b)(1)(iii))

References

Question Text For pipelines operating below 30% SMYS in a Class 3 or 4 locations, but not in an HCA, do records indicate performance of leak surveys?

**Assets Covered** 

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

#### PD.DP: Damage Prevention

75. Question Result, ID, Sat, PD.DP.PDPROGRAM.P, 192.614(a)

Question Text Is a damage prevention program approved and in place?

Assets Covered

Result Notes This is in Section 7.0 including 811 participation, excavation notification, and instructions for exposing the pipeline.

76. Question Result, ID, Sat, PD.DP.ONECALL.P, 192.614(b) References

Question Text Does the process require participation in qualified one-call systems?

**Assets Covered** 

Result Notes This is in Section 7.0

77. Question Result, ID, Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5) References

> Question Text Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?

**Assets Covered** 

Result Notes Section 7.04 (Exposure citation - operator present)

78. Question Result, ID, References Sat, PD.DP.TPD.P, 192.614(c)(1)

Question Text Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?

Assets Covered

Result Notes They sent certified letters to 30 excavators in the community. If they get a new locate, and there is a new excavator they are added to the list.

79. Question Result, ID, Sat, PD.DP.TPDONECALL.P, 192.614(c)(3) References

Question Text Does the process specify how reports of TPD are checked against One-Call tickets?

Assets Covered

Result Notes They call back and conduct positive response. They record all One Call tickets.

80. Question Result, ID, Sat, PD.DP.ONECALL.O, 192.614(c)(3) References

Question Text Observe Operator process a "One Call" ticket.

**Assets Covered** 

Result Notes I reviewed a completed ticket and Marvin provides a positive response.

81. Question Result, ID, Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text Does the damage prevention program meet minimum requirements specified in 192.614(c)?

**Assets Covered** 

Result Notes I reviewed several locate tickets and LW/BSW (Marvin Price) walked me through the process.

82. Question Result, ID, Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))
References

Question Text Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?

Assets Covered

Result Notes 5.01 and .04 has ROW inspections. Forms are in Section 22.

83. Question Result, ID, Pafarences Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?

Assets Covered

Result Notes I reviewed these records. Marvin keeps a log.

#### PD.PA: Public Awareness

84. Question Result, ID, Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))

Question Text Has the continuing public education (awareness) program been established as required?

Assets Covered

Result Notes This states in Section 10 the establishment of a PA program.

85. Question Result, ID, Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)
References

Question Text Does the operator's program documentation demonstrate management support?

**Assets Covered** 

Result Notes The Section in 5.2 in the PA program. There is a letter from Andy Bateman. (Plant Manager)

86. Question Result, ID, Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)

Question Text Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?

**Assets Covered** 

Result Notes There is only one asset. 5.4 identifies the assets.

2018 Standard and PA - Lamb Weston/BSW

- 87. Question Result, ID, Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 References Section 3)
  - Question Text Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

Assets Covered

Result Notes 5.5 has all of these

- 88. Question Result, ID, Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 References Section 3)
  - Question Text Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?

**Assets Covered** 

- Result Notes I looked at the 5.5.5 Section for affected parties. The contractors list is maintained in the hard copy files. Marvin sends certified mail in 2015 and 2018. Jan 26, 2018 was the last mailing.
- 89. Question Result, ID, Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 References Section 5)
  - Question Text Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?

Assets Covered

- Result Notes Section 7 of the PA program 7.1 Freq. 7.2 delivery methods. Section 5.5 has a more detailed breakout.
- 90. Question Result, ID, Paferences Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)
  - Question Text Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?

Assets Covered

Result Notes Appendix B: Annual Self-assessment can help determine if supplemental enhancements are required.

- 91. Question Result, ID, Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))
  References
  - Ouestion Text Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?

Assets Covered

Result Notes I reviewed the materials and they cover these five topics.

- 92. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))
  - Question Text Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?

Assets Covered

Result Notes The LEPC and the Work Development Council are other forums for getting the message out.

- 93. Question Result, ID, Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP References 1162 Table 2-3)
  - Question Text Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?

**Assets Covered** 

Result Notes They have presentations and supplemental. In Jan 2018, they sent another.

- 94. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also presented in: EP.ERG)
  - Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

Assets Covered

Result Notes I reviewed the PA LEPC Feb 7, 2018 Also, the Warden Development Council Meeting. I also reviewed a public official meeting Aug 24, 2017.

95. Question Result, ID, Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1) References

Question Text Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

**Assets Covered** 

Result Notes Section 2.1 of the PA program. They provide handouts in Spanish as well for residences.

96. Question Result, ID, Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

**Assets Covered** 

Result Notes They send mailings in Spanish as well. Brian was sending out more to the local residents today

References

97. Question Result, ID, Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?

Assets Covered

Result Notes This is in the O&M 5.16 and contains the correct interval.

References

98. Question Result, ID, Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text Has an audit or review of the operator's program implementation been performed annually since the program was developed?

**Assets Covered** 

Result Notes I reviewed the 2017 assessment done on 5-4-2018.

99. Question Result, ID, Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?

**Assets Covered** 

Result Notes Internal assessment and a third party contractor review is done.

100. Question Result, ID, Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)

Question Text Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?

Assets Covered

Result Notes The only change was the bilingual mailing addition.

References

101. Question Result, ID, Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)

Question Text Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?

Assets Covered

Result Notes This is in the 4 year review from 2014. They are going to perform an effectiveness review in 2018.

102. Question Result, ID, Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)

Question Text In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked? Assets Covered

Result Notes Appendix C has the 4 year evaluation and a survey of the public audiences. In Feb 7, 2018. They conducted one on a different form in The 2014 review was March 11, 2014. The certified mail letters had a high deliverable (26 of 30) rate.

- 103. Question Result, ID, Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2) References
  - Question Text In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?

Assets Covered

Result Notes The survey and Appendix C of the PA program determines if any revisions are needed.

104. Question Result, ID, Paferances Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)

Question Text In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?

Assets Covered

Result Notes This is covered on the surveys done in the LEPC. Brian (NMF) also hands out surveys.

105. Question Result, ID, NA, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)

Question Text Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review. They do not have enough data.

106. Question Result, ID, Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) References

Question Text Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?

**Assets Covered** 

Result Notes The bilingual outreach letter was recently added.

#### PD.RW: ROW Markers, Patrols, Monitoring

107. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text Does the process adequately cover the requirements for patrolling the ROW and conditions reported?

Assets Covered

Result Notes Section 5.02 contains this.

108. Question Result, ID, Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW) References

Question Text Do records indicate that ROW surface conditions have been patrolled as required?

Assets Covered

Result Notes I looked at the weekly patrols going back to 2016. Brian conducts those patrols quarterly and I reviewed several.

109. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References MO.RW)

Question Text Does the process adequately cover the requirements for placement of ROW markers?

Assets Covered

Result Notes This is in the O&M 5.05 E.

110. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References MO.RW)

Question Text Are line markers placed and maintained as required?

Assets Covered

Result Notes No issues with markers or signage

111. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW) References

Question Text Are the ROW conditions acceptable for the type of patrolling used?

### **PD.SP: Special Permits**

112. Question Result, ID, References NA, PD.SP.REPAIR.P, 190.341(d)(2)

Question Text If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

113. Question Result, ID, NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)

Question Text If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?

**Assets Covered** 

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

114. Question Result, ID, NA, PD.SP.REPAIR.R, 190.341(d)(2)

Question Text If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

115. Question Result, ID, References NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)

Question Text If the operator operates a pipeline under a special permit verify that the requirements have been implemented.

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

#### **RPT.NR: Notices and Reporting**

116. Question Result, ID, NA, RPT.NR.NOTIFYOQ.R, 192.805(i)

Question Text Do records indicate the Administrator or state agency was notified when the OQ Program was significantly modified?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Not since the last audit. They only addition was the EWN (Energy World Net)

117. Question Result, ID, NA, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b))

Question Text Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?

Assets Covered

Result Notes No such requirement existed in the scope of inspection review. \*\*No IMP Program\*\*\*

118. Question Result, ID, NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1)) References

Question Text Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

119. Question Result, ID, NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii)) References

> Question Text Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

120. Question Result, ID, NA, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text Do annual reports demonstrate that integrity management performance data were reported? Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

#### RPT.RR: Regulatory Reporting (Traditional)

121. Question Result, ID, Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)

Question Text Have complete and accurate Annual Reports been submitted?

Assets Covered

Result Notes CY 2016, CY 2017 were submitted and reviewed.

122. Question Result, ID, NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))

Question Text Do records indicate immediate notifications of incidents were made in accordance with 191.5?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

123. Question Result, ID, NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) References

> Question Text Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 within the required timeframe?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

124. Question Result, ID, NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(c) References

> Question Text Do records indicate accurate supplemental incident reports were filed and within the required timeframe? Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

125. Question Result, ID, NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b))

Question Text Do records indicate safety-related condition reports were filed as required?

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

126. Question Result, ID, Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b)) References

> Question Text Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?

Assets Covered

Result Notes Marvin Price provided the last two years verification.

127. Question Result, ID, Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))

Question Text Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?

**Assets Covered** 

Result Notes LW-BSW reviewed in 2017 and 2016.

#### TD.ATM: External Corrosion - Atmospheric

128. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

Question Text Is pipe that is exposed to atmospheric corrosion protected?

**Assets Covered** 

Result Notes The facilities are well coated and wrapped at the soil to air interface.

129. Question Result, ID, Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c))
References

Question Text Do records document the protection of above ground pipe from atmospheric corrosion?

Assets Covered

Result Notes These are documented on the regulator station inspection form.

130. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))
References

Question Text Do records document inspection of aboveground pipe for atmospheric corrosion?

Assets Covered

Result Notes 2/22/18, 2/25/16, 2/12/18. AC surveys.

#### TD.CPMONITOR: External Corrosion - CP Monitoring

131. Question Result, ID, Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b)) References

Question Text Do records document details of electrical checks of sources of rectifiers or other impressed current sources?

**Assets Covered** 

Result Notes I checked monthly rectifier checks.

132. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a)

Question Text Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?

**Assets Covered** 

Result Notes The methods follow NACE and standard industry practices.

133. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a))

Question Text Do records document that the CP monitoring criteria used was acceptable?

Assets Covered

Result Notes The methods follow NACE and standard industry practices.

134. Question Result, ID, Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))

Question Text Do records adequately document cathodic protection monitoring tests have occurred as required?

Assets Covered

Result Notes 2016 - 2018 all occurred as required.

135. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)

Question Text Are impressed current sources properly maintained and are they functioning properly?

Assets Covered

Result Notes Yes, They recently rebuilt the rectifier.

136. Question Result, ID, NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c)) References

Question Text Do records document details of electrical checks interference bonds, diodes, and reverse current switches?

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

137. Question Result, ID, NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)

References

Question Text Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

References

138. Question Result, ID, Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))

Question Text Do records adequately document actions taken to correct any identified deficiencies in corrosion control?

**Assets Covered** 

Result Notes They had a rectifier rebuild in 2016

References

139. Question Result, ID, Sat, TD.CPMONITOR.TESTSTATION.R, 192.469

Question Text Do records identify the location of test stations and show a sufficient number of test stations?

Assets Covered

Result Notes No issues

140. Question Result, ID, Sat, TD.CPMONITOR.TESTSTATION.O, 192.469

Question Text Do cathodically protected pipelines have a sufficient number of test stations?

Assets Covered

Result Notes No issues

141. Question Result, ID, Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))

Question Text Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart 1?

Assets Covered

Result Notes No issues

142. Question Result, ID, Sat, TD.CPMONITOR.TESTLEAD.O, 192.471(a) (192.471(b), 192.471(c))

Question Text Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart 1?

**Assets Covered** 

Result Notes No issues

143. Question Result, ID, NA, TD.CPMONITOR.INTERCURRENT.R, 192.491(c) (192.473(a))

Question Text Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

144. Question Result, ID, NA, TD.CPMONITOR.INTERCURRENT.O, 192.473(a)

Question Text Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

145. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CP, TD.CPEXPOSED) References

Question Text Do records indicate the location of all items listed in 192.491(a)?

Assets Covered

#### TD.CP: External Corrosion - Cathodic Protection

146. Question Result, ID, Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))
References

Question Text 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?

Assets Covered

Result Notes I checked records for 3 years.

147. Question Result, ID, NA, TD.CP.PRE1971.R, 192.491(c) (192.457(b))

Question Text Do records document that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations have been cathodically protected in areas where active corrosion was found?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No active corrosion.

148. Question Result, ID, NA, TD.CP.PRE1971.O, 192.457(b) References

Question Text Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

149. Question Result, ID, NA, TD.CP.AMPHOTERIC.R, 192.491(c) (192.463(b))

Question Text Do records document adequate cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline?

**Assets Covered** 

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

150. Question Result, ID, NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))
References

Question Text Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?

**Assets Covered** 

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

151. Question Result, ID, Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))
References

Question Text 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?

Assets Covered

Result Notes TS#2, 15, 17, and 28 document isolation.

152. Question Result, ID, Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))
References

Question Text Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

Assets Covered

Result Notes Yes, This was verified in the field.

153. Question Result, ID, NA, TD.CP.FAULTCURRENT.R, 192.491(c) (192.467(f))

Question Text Do records adequately document the installation and inspection of fault current and lightning protection?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. This is not an issue for this system and the rectifier is on a real time monitoring system to check for outages.

154. Question Result, ID, References NA, TD.CP.FAULTCURRENT.O, 192.467(f)

Question Text Are fault current and lightning protection for the pipeline installed and inspected?

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

155. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text Do records indicate the location of all items listed in 192.491(a)?

**Assets Covered** 

Result Notes Yes, Locations of CP assets are documented.

#### **TD.COAT: External Corrosion - Coatings**

156. Question Result, ID, Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))
References

Question Text Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?

Assets Covered

Result Notes EPCR doucumented X-True Coat as did the desgin

157. Question Result, ID, NA, TD.COAT.NEWPIPENOCOAT.R, 192.491(c) (192.455(b))
References

Question Text If a buried or submerged pipeline installed after July 31, 1971 was not installed with an external protective coating do records provide adequate documentation why such a coating was not necessary to protect the pipe from external corrosion?

**Assets Covered** 

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

158. Question Result, ID, NA, TD.COAT.NEWPIPEINSTALL.R, 192.491(c) (192.461(c), 192.461(d), 192.461(e), 192.483(a)) References

Question Text Do records document that acceptable external protective coating materials have been used and the application and inspection was done in accordance with the written procedures?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

159. Question Result, ID, NA, TD.COAT.COATAPPLY.O, 192.461(a) (192.461(c), 192.461(d), 192.461(e), 192.319(b), 192.483(a)) References

Question Text Is protective coating adequately applied?

Assets Covered

Result Notes No such activity/condition was observed during the inspection.

#### TD.CPEXPOSED: External Corrosion - Exposed Pipe

160. Question Result, ID, Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)

Question Text Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?

Assets Covered

Result Notes Two EPCRs were shown. One for Marvin and one for Kevin.

161. Question Result, ID, Paferences Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CP)

Question Text Do records indicate the location of all items listed in 192.491(a)?

Assets Covered

#### TD.ICP: Internal Corrosion - Preventive Measures

162. Question Result, ID, NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))

Question Text Do records document examination of removed pipe for evidence of internal corrosion?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

163. Question Result, ID, NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))

Question Text Is removed pipe examined for evidence of internal corrosion?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

164. Question Result, ID, NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))

Question Text Do records document adequate evaluation of internally corroded pipe?

**Assets Covered** 

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

165. Question Result, ID, NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b)) References

> Question Text Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review,

#### TD.ICCG: Internal Corrosion - Corrosive Gas

166. Question Result, ID, NA, TD.ICCG.CORRGAS.R, 192.491(c) (192.475(a))

Question Text Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

#### **TD.SCC: Stress Corrosion Cracking**

167. Question Result, ID, NA, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1))

Question Text Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

168. Question Result, ID, NA, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b)) References

Question Text Do records document that the operator has properly remediated any occurrences of SCC?

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

#### TO.PROT9: OQ Protocol 9

169. Question Result, ID, Sat, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))

Question Text Have potential issues identified by the OQ plan inspection process been corrected at the operational level?

Assets Covered

Result Notes Issue 6065 from the 2015 standard inspection was reviewed. This issue has been corrected and cleared on 12/11/2015 per the database entry. I did not observe any issues in the field during this inspection.

References

170. Question Result, ID, Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))

Question Text Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.

Assets Covered

Result Notes I verified all three individuals qualifications I met with during this inspection.

**Marvin Price** 

Manager, Energy & Environment Lamb Weston/BSW

509-349-2210 ext 54704

**Jason Wingate** 

Gas System Technician, NW **Metal Fab** 

503-692-0995

**Brian Yechout** 

Gas System Technician, NW Metal Fab

503-692-0995

171. Question Result, ID, Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))

Question Text Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks

**Assets Covered** 

Result Notes I verified all three individuals qualifications I met with during this inspection.

172. Question Result, ID, Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))

Question Text Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.

Assets Covered

Result Notes There were no issues with AOC recognition.

References

173. Question Result, ID, Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))

Question Text Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.

Assets Covered

Result Notes No issues. Both Marvin and Jason checked OQ records before we performed the work in the field.

#### TQ.OQ: Operator Qualification

References

174. Question Result, ID, Sat, TQ.OQ.RECORDS.R, 192.807

Question Text Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?

Assets Covered

Result Notes I verified Marvin, Jason, and Brians, and Vadims records.

#### TQ.TR: Training of Personnel

175. Question Result, ID, Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text Is training for emergency response personnel documented?

Assets Covered

Result Notes 1414 Shutdown, Start-up. Richard Ledgerwood, Vadim Borodulin, Marvin Price, Richard Mann, David Fits, and John Cole (all 3 yr standard qual) are qualified for shutdown.

Report Parameters: Results: all

Report Filters: Results: all

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