

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - Records Review and Field Inspection

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

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

Inspection Report			
Inspection ID/Docket number	7574		
Inspector Name & Submit Date	Derek Norwood/August 13, 2018		
Chief Eng Name & Review Date	Joe Subsits/August 13, 2018		
Operator Information			
Name of Operator:	Airgas Merchant Gas Kalama	OP ID #:	39624
Name of Unit(s):	Kalama		
Records Location:	Kalama, WA		
Date(s) of Last (unit) Inspection:	03/24/2015	Inspection Date(s):	7/24/18-7/30/18

<p>Inspection Summary:</p> <p>This inspection included records review of leak surveys, cathodic protection surveys, CP isolation testing, rectifier inspections, valve maintenance inspections, report submitting to PHMSA and the UTC, and equipment calibration. This inspection includes four probable violations and one area of concern.</p> <p><u>Probable Violations</u></p> <ul style="list-style-type: none"> • WAC 480-93-200(10)(a) • WAC 480-93-200(10)(b) • WAC 480-93-180(2) • 49 CFR Part 191.29(b) <p><u>Area of Concern</u></p> <ul style="list-style-type: none"> • WAC 480-93-188(5)

HQ Address: 12800 W Little York Houston, TX 77041	System/Unit Name & Address: Airgas Merchant Gas Kalama 185 Eastwind Rd Kalama, WA 98625	
Co. Official: Lorrin Honda Phone No.: 713-624-8755 Fax No.: Emergency Phone No.: 360-673-1400	Phone No.: 360-673-1400 Fax No.: Emergency Phone No.:	
Persons Interviewed	Title	Phone No.
Scott Moon	Plant Manager	360-673-1400
Bobby Skelton	Pipeline Regulatory Compliance Manager	713-438-6351
Grayson Taylor	Manager, Fleet Safety Programs	713-896-2337
Larry Chapman		
Mike Wendell		

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UTC staff conducted abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.			
(check one below and enter appropriate date)			
<input checked="" type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	12/10/2014
<input type="checkbox"/>	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	

GAS SYSTEM OPERATIONS			
Gas Supplier	Airgas Merchant		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	0
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	0
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	2.43		
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	185 psig		
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	No		
Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Comments: Other than 2016, annual reports are consistently submitted late to the UTC			

Pipe Specifications:			
Year Installed (Range)	1999	Pipe Diameters (Range)	2.375"
Material Type	Steel	Line Pipe Specification Used	API 5L X42
Mileage	2.43	SMYS %	
Supply Company	Airgas	Class Locations	3

REPORTING RECORDS			S	U	N/A	N/C
1.	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?			X	
2.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which (regardless of cause);				
3.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization;			X	
4.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; Note: Report all damages regardless if claim was filed with pipeline company or not.			X	

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REPORTING RECORDS			S	U	N/A	N/C
5.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas;			X	
6.	480-93-200(1)(d)	Results in the unintentional ignition of gas;			X	
7.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;			X	
8.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;			X	
9.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or			X	
10.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 24 hours) for;			X	
11.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			X	
12.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;			X	
13.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
14.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP			X	

Comments:
Item 1 – Airgas does not operate over 250 psig
Items 2-14 – Airgas has had no reportable incidents

			S	U	N/A	N/C
15.	480-93-200(5)	Written incident reports (within 30 days) including the following;				
16.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;			X	
17.	480-93-200(4)(b)	The extent of injuries and damage;			X	
18.	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	
19.	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	
20.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
21.	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site;			X	
22.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;			X	
23.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;			X	
24.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;			X	
25.	480-93-200(4)(j)	Line type;			X	
26.	480-93-200(4)(k)	City and county of incident; and			X	
27.	480-93-200(4)(l)	Any other information deemed necessary by the commission.			X	
28.	480-93-200(5)	Submit a supplemental report if required information becomes available			X	
29.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure			X	

Comments:
Items 15-28 – Airgas has had no reportable incidents
Item 29 – Airgas has had no construction defects or material failures

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30.	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)				
31.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)			X	
32.	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	
33.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? Note: Records maintained for two years and made available to the commission upon request.			X	
34.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
35.	480-93-200(8)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 			X	
36.	480-93-200(8)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 			X	
37.	480-93-200(8)(c)	<ul style="list-style-type: none"> Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. 			X	
38.	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) 			X	
39.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form)			X	
40.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the preceding calendar year. (<i>NOTE: PHMSA extension to June 15, 2013 for the year 2012.</i>)	S	U	N/A	N/C
41.	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		
42.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.		X		
43.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities Emailed to Cowlitz Dept of Emergency Management for Cowlitz and Local FD EMS (Cowlitz 5)	X			
44.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.			X	
45.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required			X	

Comments:

Items 30-39 – Airgas has had no damages to their pipeline
Item 41 – Report submitted late to UTC for the 2015 Annual Report and not submitted to the UTC for 2017
Item 42 – 2017, 2016 and 2015 Construction defects and material failures reports were submitted late
Item 44 – Airgas has had no construction since initial construction
Item 45 – This report is not required for Airgas since there are less than 50 covered employees

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CONSTRUCTION RECORDS			S	U	N/A	N/C
46.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			X	
47.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
48.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main			X	
49.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
50.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length			X	
51.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines			X	
52.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule)			X	
53.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig			X	

Comments:
 Items 46-53 – Airgas has had no construction during this inspection period

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C	
54.	Damage Prevention Program						
55.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample. Ticket # 17076881 received 3/21/17 cleared 3/21/17	X				
56.	480-93-015(1)	Odorization of Gas – Concentrations adequate?			X		
57.	480-93-015(2)	Monthly Odorant Sniff Testing			X		
58.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements			X		
59.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)			X		
60.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months)			X		
61.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?			X		
62.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained			X		
63.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained			X		
64.	480-93-187	Gas Leak records - Content			X		
65.	480-93-188(1)	Gas Leak surveys - Coverage	X				
66.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days)	X				
67.	480-93-188(3)	Leak survey frequency (Refer to Table Below) Unodorized line surveyed monthly, reviewed records for 2015, 2016, 2017 and through June 2018	X				

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

68.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs			X	
69.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred			X	
70.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected			X	

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
71.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions			X	
72.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings.			X	
73.	480-93-188(5)	Gas survey records: Retention/Content	X			
74.	480-93-188(6)	Leak Survey Program/Self Audits			X	

Comments:
 Items 56-59 – Airgas does not odorize their hydrogen line
 Item 60 – No pipelines attached to bridges
 Item 61 – No markers have been reported missing or damaged
 Item 62 – No gas leaks found
 Item 63 – No leaks from a foreign source have been found
 Item 64 – No gas leaks found
 Items 68-72 – None of these events have occurred near Airgas’ pipeline
 Item 74 – No leaks so there is nothing to audit

CORROSION CONTROL RECORDS			S	U	N/A	N/C
75.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed			X	
76.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)			X	
77.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) Performed annually, records included with CP survey	X			
78.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months Reviewed records for 2015, 2016, 2017 and through June 2018	X			
79.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods			X	
80.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days			X	
81.	480-93-110(5)(c)	Casing shorts cleared when practical			X	
82.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months			X	

Comments:
 Item 75 – No coating has been removed
 Item 76 – No deficiencies have been found
 Item 79 – Airgas has test leads on pipe and can get a reading on the casing vent
 Items 80-82 – No shorted conditions have been found

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
83.	480-93-015(1)	Odorization levels			X	
84.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) Both casings tested, not within 100 mV of carrier pipe	X			

Comments:

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EXIT INTERVIEW		
Exit Interview Conducted? Yes Items Covered: Discussed annual report submittal, submission to NPMS, O&M updates to the commission, construction defects reports, including equipment ID# on leak survey report and specifying calibration expiration/due date on leak survey reports	Date:	07/30/2018

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)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.

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