

Inspection Output (IOR)

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Inspection Information

Inspection Name	Georgia Pacific Camas Mill Records Review and Fiel	Operator(s)	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted	01/03/2020
Status	PLANNED	Lead	David Cullom	Plan Approval	01/08/2020 by Joe Subsits
Start Year	2020	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity Start	08/11/2020
System Type	GT	Supervisor	Joe Subsits	All Activity End	08/13/2020
Protocol Set ID	GT.2020.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This was a standard inspection, consisting of plan/procedure review, records review, and field verification. Field rectifier checks were performed, PSP readings for polarized (off) potentials were performed. Electrical isolation checks were conducted and checks were made for AC stray current. The ROW condition was checked and the main shut off valve was also checked for proper function. Records were complete and checked for the last several years.

Facilities visited and Total AFOD

GP Camas Mill in Camas, Wa 2 AFODs and one remote field day.

Summary of Significant Findings

There were no probable violations or areas of concern.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86255	Georgia-Pacific	unit	86255	Compressor Stations Storage Fields Bottle/Pipe - Holders Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	83	83	83	100.0%

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required	
									%	Complete	
					Plastic Pipe AMAOP CDA Abandoned						

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

Plans

Plan #	Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	86255	Core, Baseline Records (Form 1), Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail

Plan Implementations

#	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Inspected	Total	Required %
1	Records and Field Review	--	08/11/2020	08/13/2020	n/a	all planned questions	all assets	all types	83	83	83	83	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

This inspection has no Form data entry.

Results (all values, 83 results)

106 (instead of 83) 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, References **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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. This was done in 2013.**

AR.PTI: Integrity Assessment Via Pressure Test

2. Question Result, ID, References **NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))**
 Question Text *Do the test records validate the pressure test?*
 Assets Covered **86255**

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

AR.RC: Repair Criteria (HCA)

3. Question Result, ID, References **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 **86255**
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.RMP: Repair Methods and Practices

4. Question Result, ID, References **NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**
Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*
Assets Covered **86255**
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
5. Question Result, ID, References **NA, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-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 **86255**
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
6. Question Result, ID, References **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 **86255**
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
7. Question Result, ID, References **NA, 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 **86255**
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
8. Question Result, ID, References **NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))**
Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*
Assets Covered **86255**
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

DC.CO: Construction

9. Question Result, ID, References **NA, DC.CO.CLEAR.R, 192.325(a) (192.325(b), 192.325(c))**
Question Text *Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe?*
Assets Covered **86255**
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
10. Question Result, ID, References **NA, DC.CO.COVER.R, 192.327(a) (192.327(b), 192.327(c), 192.327(d), 192.327(e))** (also presented in: DC.COMM)

Question Text *Is onshore piping minimum cover provided as specified in 192.327?*
Assets Covered 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

DC.WELDINSP: Construction Weld Inspection

11. Question Result, ID, NA, DC.WELDINSP.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, References 192.243, 192.245)
Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*
Assets Covered 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
12. Question Result, ID, NA, DC.WELDINSP.WELDNDT.R, 192.243
References
Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*
Assets Covered 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

DC.WELDPROCEDURE: Construction Welding Procedures

13. Question Result, ID, NA, DC.WELDPROCEDURE.WELD.R, 192.225
References
Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*
Assets Covered 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

DC.COMM: Pipeline Commissioning

14. Question Result, ID, Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3)) (also presented in: MO.GO)
References
Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*
Assets Covered 86255
Result Notes Copies are available. The Mill Emergency Response Team (MERT) carries a book in their truck of the pipeline system information.
15. 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, 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 86255
Result Notes October 2019 there was a drill with MERT, FD, School board, City of Camas, police. I viewed the handout. MERT has a good relationship with the FD.
16. Question Result, ID, NA, DC.CO.COVER.R, 192.327(a) (192.327(b), 192.327(c), 192.327(d), 192.327(e)) (also presented in: References DC.CO)
Question Text *Is onshore piping minimum cover provided as specified in 192.327?*
Assets Covered 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
17. Question Result, ID, Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d)) (also presented References in: DC.DPC)
Question Text *Are transmission line valves being installed as required by 192.179?*
Assets Covered 86255
Result Notes This line is class 3. The line is ~1.04 mile.
18. Question Result, ID, Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b)) (also presented in: MO.GM)
References

- Question Text *Are field inspection and partial operation of transmission line valves adequate?*
 Assets Covered 86255
 Result Notes The valve at the Williams gate was fully operated during the inspection.
19. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS, MO.GO)
 References
 Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
 Assets Covered 86255
 Result Notes A marker had a sticker damaged. It was replaced.
20. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW, PD.RW)
 References
 Question Text *Are line markers placed and maintained as required?*
 Assets Covered 86255
 Result Notes There are no issues with marker placement and maintenance.
21. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW, PD.RW)
 References
 Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
 Assets Covered 86255
 Result Notes The ROW is well cleared and foot patrols are suitable.
22. Question Result, ID, Sat, PD.DP.PDPROGRAM.R, 192.614(c) (also presented in: PD.DP)
 References
 Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
 Assets Covered 86255
 Result Notes Paradigm did the mailings in the past. The Compliance Group (TCG) will do it in the future. GP has a newspaper ad that usually goes out in the summer. 811 banners are set up at events. 1320ft on each side of the pipeline is the notification area for PA purposes. GP sent emergency officials information countywide. Last year they also attended PANW.
23. Question Result, ID, Sat, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a)) (also presented in: IM.PM)
 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 86255
 Result Notes 8ft fence for site security. They have a safety zone of 25 feet. Those needing locates get contacted by GP directly.
24. Question Result, ID, Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f)) (also presented in: MO.GOODOR)
 References
 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 86255
 Result Notes Instrument cal checked 4/27/2020. Records reviewed for 8/5/20, 7/9/20, 11/5/19, 1/12/2019, 2/2019, 1/13/2018, 5/7/2018
25. Question Result, ID, Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: TQ.TR)
 References
 Question Text *Is training for emergency response personnel documented?*
 Assets Covered 86255
 Result Notes Roy Rogers performed this training for MERT (Mill Emergency Response Team) Dec 13, 2019
26. Question Result, ID, Sat, TQ.OQ.RECORDS.R, 192.807 (also presented in: TQ.OQ)
 References
 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 86255

Result Notes This was reviewed during our full OQ inspection.

Roy Rogers PSP - 192.505 MEA 7/29/2017 and Stephen Hernandez 1/14/19 - 1/14/22 EWN

Stephen Hernandez Function Test Valves 3/25/19 3/25/2022 EWN.

DC.DPC: Design of Pipe Components

27. Question Result, ID, Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d)) (also presented References in: DC.COMM)

Question Text *Are transmission line valves being installed as required by 192.179?*

Assets Covered 86255

Result Notes This line is class 3. The line is ~1.04 mile.

28. Question Result, ID, NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a)) References

Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 86255

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

29. Question Result, ID, NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c)) References

Question Text *Does the transmission project's design and construction comply with 192.476?*

Assets Covered 86255

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

DC.MO: Maintenance and Operations

30. Question Result, ID, NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5) References

Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*

Assets Covered 86255

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

EP.ERG: Emergency Response

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

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

Assets Covered 86255

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

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: DC.COMM, 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 86255

Result Notes October 2019 there was a drill with MERT, FD, School board, City of Camas, police. I viewed the handout. MERT has a good relationship with the FD.

FS.FG: Facilities General

33. Question Result, ID, NA, FS.FG.VAULTINSPECT.R, 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d)) (also References presented in: MO.GM)
Question Text *Do records document the adequacy of inspections of all vaults having an internal volume of 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*
Assets Covered 86255
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

IM.CA: Continual Evaluation and Assessment

34. Question Result, ID, Sat, 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 86255
Result Notes This will be addressed in a full TIMP inspection performed later this week.

IM.PM: Preventive and Mitigative Measures

35. Question Result, ID, Sat, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a)) (also presented in: DC.COMM)
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 86255
Result Notes 8ft fence for site security. They have a safety zone of 25 feet. Those needing locates get contacted by GP directly.

MO.GC: Conversion to Service

36. Question Result, ID, NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b))
References
Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*
Assets Covered 86255
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

37. Question Result, ID, NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))
References
Question Text *Did personnel respond to indications of abnormal operations as required by the process?*
Assets Covered 86255
Result Notes No such activity/condition was observed during the inspection.
38. 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 86255
Result Notes No such activity/condition was observed during the inspection.

MO.GOCLASS: Gas Pipeline Class Location

39. 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 86255

Result Notes No such event occurred, or condition existed, in the scope of inspection review. GP is <40% SMYS

40. Question Result, ID, NA, 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 86255

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

41. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also References presented in: DC.COMM, 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 86255

Result Notes A marker had a sticker damaged. It was replaced.

MO.GOMAOP: Gas Pipeline MAOP

42. Question Result, ID, References 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 86255

Result Notes This was reviewed in the O&M. The pressure is limited to 250 psig by the proximity rules.

MO.GM: Gas Pipeline Maintenance

43. Question Result, ID, References Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also 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 86255

Result Notes They keep all records of patrols and leak surveys.

44. Question Result, ID, References Sat, 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 86255

Result Notes No hot work permits since last inspection.

45. 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 86255

Result Notes I reviewed the July 2020, 2019 and 1/13/18. The operator performs this twice a year.

46. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b)) (also presented in: DC.COMM)

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

Assets Covered 86255

Result Notes The valve at the Williams gate was fully operated during the inspection.

47. Question Result, ID, [NA, FS.FG.VAULTINSPECT.R, 192.709\(c\) \(192.749\(a\), 192.749\(b\), 192.749\(c\), 192.749\(d\)\)](#) (also References presented in: FS.FG)
Question Text *Do records document the adequacy of inspections of all vaults having an internal volume of 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*
Assets Covered [86255](#)
Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

MO.GOODOR: Gas Pipeline Odorization

48. Question Result, ID, [Sat, MO.GOODOR.ODORIZE.R, 192.709\(c\) \(192.625\(a\), 192.625\(b\), 192.625\(c\), 192.625\(d\), 192.625\(e\), 192.625\(f\)\)](#) (also presented in: DC.COMM)
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 [86255](#)
Result Notes [Instrument cal checked 4/27/2020. Records reviewed for 8/5/20, 7/9/20, 11/5/19, 1/12/2019, 2/2019, 1/13/2018, 5/7/2018](#)

MO.GO: Gas Pipeline Operations

49. Question Result, ID, [NA, 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 [86255](#)
Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
50. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.O, 192.613\(a\) \(192.613\(b\), 192.703\(a\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: DC.COMM, 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 [86255](#)
Result Notes [A marker had a sticker damaged. It was replaced.](#)
51. 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 [86255](#)
Result Notes [This was reviewed by the operator in January.](#)
52. Question Result, ID, [Sat, MO.GO.OMEFFECTREVIEW.R, 192.605\(a\) \(192.605\(b\)\(8\)\)](#)
References
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 [86255](#)
Result Notes [Work is submitted and reviewed by Steve R, Ron, or Stephen.](#)
53. Question Result, ID, [Sat, MO.GO.OMHISTORY.R, 192.605\(a\) \(192.605\(b\)\(3\)\)](#) (also presented in: DC.COMM)
References
Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*
Assets Covered [86255](#)
Result Notes [Copies are available. The Mill Emergency Response Team \(MERT\) carries a book in their truck of the pipeline system information.](#)
54. Question Result, ID, [Sat, MO.GO.OMHISTORY.O, 192.605\(b\)\(3\)](#)
References
Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*
Assets Covered [86255](#)

Result Notes Hard copy and electronic are available.

55. Question Result, ID, References 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 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GMOPP: Gas Pipeline Overpressure Protection

56. Question Result, ID, References 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 86255
Result Notes 9/10/.19 and 9/17/18 Williams Checked relief. RSP at 234 psig. Capacity review performed = no changes.
57. Question Result, ID, References Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also 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 86255
Result Notes They keep all records of patrols and leak surveys.
58. 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 86255
Result Notes 9/10/19 and 9/17/18 Williams checked the relief. RSP at 234 psig. Capacity review performed = no changes.
59. Question Result, ID, References NA, 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 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

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

60. 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 86255
Result Notes July 2020 (7/9/2020) 4/5/20. (Patrols) The leak survey was performed 10/5/19. A Heath DPIII used cal 9/6/2019. The 2018 survey was done on 10/18/2018 For this survey a Heath DP III S/N 107719 cal 9/25/18 was employed. On 10/14/2017 a survey was performed. Heath DPIII S/N 107719 was cal checked on 10/9/2017.
61. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: DC.COMM, PD.RW)
Question Text *Are line markers placed and maintained as required?*
Assets Covered 86255
Result Notes There are no issues with marker placement and maintenance.
62. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: DC.COMM, PD.RW)
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered 86255

Result Notes The ROW is well cleared and foot patrols are suitable.

63. Question Result, ID, References 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 86255

Result Notes Notes contained in previous question under ROW and patrols.

PD.DP: Damage Prevention

64. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c) (also presented in: DC.COMM)

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

Assets Covered 86255

Result Notes Paradigm did the mailings in the past. The Compliance Group (TCG) will do it in the future. GP has a newspaper ad that usually goes out in the summer. 811 banners are set up at events. 1320ft on each side of the pipeline is the notification area for PA purposes. GP sent emergency officials information countywide. Last year they also attended PANW.

PD.PA: Public Awareness

65. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: DC.COMM, 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 86255

Result Notes October 2019 there was a drill with MERT, FD, School board, City of Camas, police. I viewed the handout. MERT has a good relationship with the FD.

66. Question Result, ID, References 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 86255

Result Notes GP has been sending flyers in Spanish and English. TGC uses the Census data and sends mailers depending on the data.

PD.RW: ROW Markers, Patrols, Monitoring

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

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

Assets Covered 86255

Result Notes July 2020 (7/9/2020) 4/5/20. (Patrols) The leak survey was performed 10/5/19. A Heath DPIII used cal 9/6/2019. The 2018 survey was done on 10/18/2018 For this survey a Heath DP III S/N 107719 cal 9/25/18 was employed. On 10/14/2017 a survey was performed. Heath DPIII S/N 107719 was cal checked on 10/9/2017.

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

Question Text *Are line markers placed and maintained as required?*

Assets Covered 86255

Result Notes There are no issues with marker placement and maintenance.

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

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

Assets Covered 86255

Result Notes The ROW is well cleared and foot patrols are suitable.

RPT.RR: Regulatory Reporting (Traditional)

70. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)
Question Text *Have complete and accurate Annual Reports been submitted?*
Assets Covered 86255
Result Notes .64 HCA miles FOR CY 2019
71. Question Result, ID, References 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 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
72. Question Result, ID, References NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)
Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*
Assets Covered 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
73. Question Result, ID, References NA, RPT.RR.INCIDENTREPORT.R, 191.15(a)
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 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
74. Question Result, ID, References 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 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
75. Question Result, ID, References Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))
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 86255
Result Notes Feb 4, 2020 OSave record provided.
76. Question Result, ID, References 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 86255
Result Notes OPID numbers have been obtained for many years.

TD.ATM: Atmospheric Corrosion

77. Question Result, ID, References 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 86255
78. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))
Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*

Assets Covered 86255

Result Notes 7/4/19 and in 7/10/2020. No issues noted. They are doing it annually. It is a P&M measure

TD.CPMONITOR: External Corrosion - CP Monitoring

79. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))
Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*
Assets Covered 86255
Result Notes 7/9/20, 5/7/20, 3/8/20, 1/4/20, 1/12/19, 3/2/19, 4/1/19, 5/3/19, 7/4/19, 9/1/19, 10/5/19, 11/5/19.
80. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a))
Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*
Assets Covered 86255
Result Notes Instant offs were performed during field testing
81. Question Result, ID, References 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 86255
Result Notes 7/2020, 7/4/2019, 7/1/2018 CP records reviewed. Fluke MM Due Jan 2 2021

The half cell is replaced every year.
82. 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 86255
Result Notes The field check of the rectifier was suitable.
83. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))
Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*
Assets Covered 86255
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
84. Question Result, ID, References NA, 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 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
85. Question Result, ID, References 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 I?*
Assets Covered 86255
86. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.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 86255
Result Notes The operator monitors for AC interference at the coupon is at the Williams gate. AC readings are also taken at each test location.

87. Question Result, ID, References **Sat, TD.CP.MONITOR.INTFRCURRENT.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 **86255**
Result Notes **Just the AC transmission that is being monitored.**

88. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CP, TD.CPEXPOSED)
Question Text *Do records indicate the location of all items listed in 192.491(a)?*
Assets Covered **86255**
Result Notes **This is in the O&M**

TD.CP: External Corrosion - Cathodic Protection

89. Question Result, ID, References **Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))**
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 **86255**

90. Question Result, ID, References **NA, TD.CP.PRE1971.O, 192.457(b)**
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 **86255**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

91. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))**
Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*
Assets Covered **86255**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

92. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))**
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 **86255**
Result Notes **NWPL Tap Site has these records. An interrupter is also used to assist to verify isolation.**

93. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CP.MONITOR, TD.CPEXPOSED)
Question Text *Do records indicate the location of all items listed in 192.491(a)?*
Assets Covered **86255**
Result Notes **This is in the O&M**

TD.COAT: External Corrosion - Coatings

94. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))**
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 **86255**
Result Notes **It is 12-14mils FBE. This is in the original construction documents. They used Scotchcote 206N. This is in GP Camas Pipeline data elements.**

TD.CPEXPOSED: External Corrosion - Exposed Pipe

95. Question Result, ID, References **NA, 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. None for this 3 year period.**
96. Question Result, ID, References **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 **86255**
Result Notes **This is in the O&M**

TD.ICP: Internal Corrosion - Preventive Measures

97. Question Result, ID, References **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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. None for this 3 year period. They have seen the inside of the pipe 3 times in it's history. No corrosion found.**
98. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))**
Question Text *Do records document adequate evaluation of internally corroded pipe?*
Assets Covered **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. None for this 3 year period.**
99. Question Result, ID, References **NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))**
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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TD.ICCG: Internal Corrosion - Corrosive Gas

100. Question Result, ID, References **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 **86255**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TQ.OO: Operator Qualification

101. Question Result, ID, References **Sat, TQ.OO.OOCONTRACTOR.R, 192.807(a) (192.807(b))**
Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
Assets Covered **86255**
Result Notes **We reviewed this during the OQ program inspection**
102. Question Result, ID, References **Sat, TQ.OO.RECORDS.R, 192.807** (also presented in: DC.COMM)

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 86255

Result Notes This was reviewed during our full OQ inspection.

Roy Rogers PSP - 192.505 MEA 7/29/2017 and Stephen Hernandez 1/14/19 - 1/14/22 EWN

Stephen Hernandez Function Test Valves 3/25/19 3/25/2022 EWN.

TQ.QU: Qualification of Personnel - Specific Requirements

103. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 86255

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

104. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 86255

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

105. Question Result, ID, References NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered 86255

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

TQ.TR: Training of Personnel

106. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: DC.COMM)

Question Text *Is training for emergency response personnel documented?*

Assets Covered 86255

Result Notes Roy Rogers performed this training for MERT (Mill Emergency Response Team) Dec 13, 2019

Report Parameters: Results: all

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