

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	Inspection 8057		
Inspector Name & Submit Date	Scott Rukke 4/16/2020		
Chief Eng. Name & Review Date	Joe Subsits, 4/17/2020		
Operator Information			
Name of Operator:	NW Natural	OP ID #:	13840
Name of Unit(s):	Transmission		
Records Location:	250 SW Taylor Portland OR		
Date(s) of Last (unit) Inspection:	4/27/2017-4/28/2017	Inspection Date(s):	4/8/2020 – 4/16/2020

<p>Inspection Summary:</p> <p>This is an intrastate transmission pipeline that is tied into Williams Pipeline West. It is 3.5 miles of 8-inch steel installed in 1956 and 2000. It operates at 26% SMYS and 18.75% SMYS. Williams provides regulation and over-pressure protection at the gate station. There are 4 additional regulator stations serving distribution systems.</p> <p>Due to COVID-19 concerns all records were reviewed electronically or through Skype.</p> <p>All record reviews that would normally be done in the operators office were entered as “plan and procedure review” time.</p> <p>Field portion of the inspection:</p> <p>Met with NWN at their Camas Gate Station @ 27712 NE 28th St, Camas WA at 8:30 am. Met with Compliance Technician Jaimie Lemke and Cathodic Protection Technician Dave Maynard. After inspecting the Camas Gate Station and taking cathodic protection readings we drove the entire transmission pipeline from the gate station to the end of the pipeline. We stopped at all installed cathodic protection test stations along the route and took CP readings, operated emergency valves and inspected the single bridge crossing.</p> <p>No regulator stations were tested. Over-pressure protection and regulation is provided by Williams Pipeline West at the Camas Gate Station on the Williams side of the station. All other regulating stations were on the distribution side of the system.</p>
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HQ Address: 250 SW Taylor Portland OR 97204	System/Unit Name & Address: Same	
Co. Official: Jon Huddleston Phone No.: 503-226-4211 x2522 Fax No.: Emergency Phone No.: 503-621-8379	Phone No.: Fax No.: Emergency Phone No.:	
Persons Interviewed	Title	Phone No.
Scott Lundgren	Engineering Manager, System Integrity	503-610-7561
Ryan Truair	Sr. Manager Code Compliance	503-610-7551
Dave Maynard	Corrosion Technician	503-806-7122
Keith Perkins	Specialty Construction	503-704-7679
Joe Reynosa	Construction Crew Leader	503-610-7694
Trent Thompson	Construction Crew Member	503-610-7694

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Jaimie Lemke	Compliance Specialist	503-610-7639
Margaret Locke	Compliance Engineer	503-610-7359
Gabe Cabatic	Quality and Qualifications Manager	503-610-7459
Samantha Rookstool	Compliance Specialist	503-610-7641

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 type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	Unknown
<input type="checkbox"/>	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	Unknown

GAS SYSTEM OPERATIONS			
Gas Supplier	Williams		
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)	3.5 miles all considered Class 3		
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	375	400	375
Town:	N/A		
Other:	N/A		
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	N/A		
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:			
No incidents since the last inspection. No leaks since the last inspection. All records were reviewed electronically or through Skype meetings.			

Pipe Specifications:			
Year Installed (Range)	1956, 2000	Pipe Diameters (Range)	8
Material Type	Steel	Line Pipe Specification Used	API-5L
Mileage	3.5	SMYS %	26% and 18.75%
Supply Company	Williams Pipeline West	Class Locations	3 (1.6 in HCA)

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REPORTING RECORDS			S	U	N/A	N/C
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator submitted information into NPMS database along with changes made after the original submission and have they 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	
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:

Question 1 – Records were reviewed indicating submission to NPMS
 Questions 2-14 – N/A, none of these occurred.

15.	480-93-200(5)	Written incident reports (within 30 days) including the following;	S	U	N/A	N/C
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	

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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				
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:
All N/A since last inspection.

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.	49 CFR 192.617	Did the operator have appropriate records of previous accidents and failures including third party damage and leak response to ensure appropriate operator response?			X	
32.	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	
33.	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	
34.	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	
35.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
36.	480-93-200(8)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 			X	
37.	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	
38.	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	
39.	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	
40.	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	
41.	442(c)(6)	Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? Yes. This is a liquid code. But, we did review Advisory Bulletin ADB-99-04, Directional Drilling and Other Trenchless Technology Operations Conducted in Proximity to Underground Pipeline Facilities. This bulletin advises owners and operators of natural gas and hazardous liquid pipeline systems to review, and amend if necessary, their written damage prevention program to minimize the risks associated with directional drilling and other trenchless technology operations.	X			

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42.	Damage Prevention (Operator Internal Performance Measures) PHMSA – State Program Evaluation Questions	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) Yes. NWN has a Quality Assurance Program where they set target inspections for each employee performing different types of work including O&M.	X			
43.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? Yes it is in NWN contracts with contract locators. They can charge penalties for late locates etc.	X			
44.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels. Yes. NWN has Contactor Compliance Specialists.	X			
45.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? Yes, through their OQ Program	X			
46.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. This is accessible through their procedure OQ 137-02 in their on-line Field Operations Manual.	X			
47.		Are locates being made within the timeframes required by state law and regulations? Examined through a Skype meeting.	X			
48.	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements? Yes, OQ 137-02 in the field operations manual. NWN OQ qualifies all contractors and does not rely on contractor OQ programs.	X				
49.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year. (<i>NOTE: PHMSA extension to June 15, 2013 for the year 2012.</i>)	S	U	N/A	N/C
50.	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			
51.	49 CFR 195.402	Did the operator follow written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? This is a liquid code			X	
52.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. No leaks			X	
53.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities. Yes, SPW 619	X			
54.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
55.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required. Yes. Submitted on 3/5/2020, SPW 007	X			

Comments:

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CONSTRUCTION RECORDS			S	U	N/A	N/C
56.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables No Construction observed. No welding observed.			X	
57.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 All casings are vented			X	
58.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main No construction observed.			X	
59.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services No construction observed.			X	
60.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length No construction observed.			X	
61.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines No construction observed.			X	
62.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule) No construction observed.			X	
63.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig No construction observed.			X	

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
64.	Damage Prevention Program					
65.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample. Repeat of 47			X	
66.	480-93-015(1)	Odorization of Gas – Concentrations adequate? Records reviewed through electronic emails.	X			
67.	480-93-015(2)	Monthly Odorant Sniff Testing. Records reviewed through electronic emails.	X			
68.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements. No remediation required.			X	
69.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
70.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months)	X			
71.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? No records of missing markers.			X	
72.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained N/A			X	
73.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained No such event			X	
74.	480-93-187	Gas Leak records – Content No leaks since last inspection.			X	
75.	480-93-188(1)	Gas Leak surveys - Coverage	X			
76.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) Records reviewed through email.	X			
77.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C								
<table border="1" style="margin: auto; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Business Districts (By 6/02/07)</td> <td style="padding: 5px; text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">High Occupancy Structures</td> <td style="padding: 5px; text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">Pipelines Operating ≥ 250 psig</td> <td style="padding: 5px; text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">Other Mains: CI, WI, copper, unprotected steel</td> <td style="padding: 5px; text-align: center;">2/yr (7.5 months)</td> </tr> </table>			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)				
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)													
78.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs N/A			X									
79.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred N/A			X									
80.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected N/A			X									
81.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions N/A			X									
82.	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. N/A			X									
83.	480-93-188(5)	Gas survey records: Retention/Content	X											
84.	480-93-188(6)	Leak Survey Program/Self Audits Will verify during standard unit inspection.				X								

Comments:

Item 72, 78-82 No leaks on the system since last inspection

CORROSION CONTROL RECORDS			S	U	N/A	N/C
85.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed N/A			X	
86.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) N/A			X	
87.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) Yes. SPW 737	X			
88.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
89.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods All casings are vented			X	
90.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days No shorted conditions.			X	
91.	480-93-110(5)(c)	Casing shorts cleared when practical N/A			X	
92.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months N/A			X	

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
93.	480-93-015(1)	Odorization levels. Not checked in the field due to COVID-19 concerns. Records show good odorization levels.	X			
94.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) All casings are vented.			X	

Comments:

EXIT INTERVIEW	
Exit Interview Conducted? 4/16/2020 through email due to Covid 19 concerns . Items Covered: There were no issues identified during this inspection.	Date: 4/16/2020

For PHMSA Advisory Bulletins, go to <https://www.phmsa.dot.gov/regulations-fr/notices>