

Inspection Output (IOR)

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Inspection Information

Inspection Name	8251 Cardinal Public Awareness	Operator(s)	CARDINAL FG (32176)	Plan Submitted	01/27/2021
		Lead	Anthony DorrOUGH	Plan Approval	--
		Lead+		All Activity Start	01/27/2021
Status	STARTED	Observer(s)	Rell Koizumi	All Activity End	01/27/2021
Start Year	2021	Supervisor	Joe Subsits	Inspection Submitted	--
System Type	GT	Director	Sean Mayo	Inspection Approval	--
Protocol Set ID	GT.2020.02				

Inspection Summary

Scope and Summary:

This Public Awareness (PA) gas transmission inspection covered process and records review questions and . The last PA inspection of this unit was performed on 4/20/2017 with no recommended follow up actions. A verbal exit interview was conducted on 1/27/21.

Dates and Activities:

01/27/2021 - In person audit at Cardinal Glass FG Facilities (545 W Avery Rd, Winlock WA)

Summary of Significant Findings:

No apparent violations of federal or state code
No areas of concern identified

Primary operator contacts/participants in the inspection:

Stephen Hernandez | The Compliance Group |

Recommended follow up actions for next inspection:

No follow-up needed

*However: Liaison records were not in violation but need more detailed documentation; Cardinal suggested and will implement improvements which staff found acceptable. Using 5-year Census data for language population calculations for such a small system is not very accurate, but does not rise to the level of a probable violation. Cardinal has stated that they will try to come up with more accurate means by establishing a locally specific baseline percentage moving forward.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	Cardinal PA	Cardinal FG	unit	--	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	41	41	41	100.0%

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

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Cardinal PA	n/a	PD	P, R, O, S	Detail	

Plan Implementations

Activity #	SMART Name	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Cardinal PA	--	01/27/2021 01/27/2021	n/a	all planned questions	all assets	all types	41	41	41	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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Cardinal PA	COMPLETED	01/27/2021	Cardinal PA	--

Results (all values, 41 results)

47 (instead of 41) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERG: Emergency Response

- 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 [Cardinal PA](#)

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

- Question Result, ID, [Sat, MO.RW.PATROL.P, 192.705\(a\) \(192.705\(b\), 192.705\(c\)\)](#) (also presented in: PD.RW)
References
Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*
Assets Covered [Cardinal PA](#)
Result Notes [7.4 & 7.6 Leakage Survey](#)
- Question Result, ID, [Sat, MO.RW.PATROL.R, 192.709\(c\) \(192.705\(a\), 192.705\(b\), 192.705\(c\)\)](#) (also presented in: PD.RW)
References
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered [Cardinal PA](#)
Result Notes [Viewed Pipeline Patrol Reports for 2018-2019-2020](#)

4. 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 [Cardinal PA](#)
5. 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 [Cardinal PA](#)
6. 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 [Cardinal PA](#)
 Result Notes [18.2 Pipeline Markers](#)

PD.DP: Damage Prevention

7. Question Result, ID, [Sat, PD.DP.PDPROGRAM.P, 192.614\(a\)](#)
 References
 Question Text *Is a damage prevention program approved and in place?*
 Assets Covered [Cardinal PA](#)
8. 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 [Cardinal PA](#)
 Result Notes [18.1 One Call System](#)
9. 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 [Cardinal PA](#)
10. Question Result, ID, [Sat, PD.DP.TPD.P, 192.614\(c\)\(1\)](#)
 References
 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 [Cardinal PA](#)
 Result Notes [18.8 Local Excavators](#)
11. 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 [Cardinal PA](#)
12. Question Result, ID, [Sat, PD.DP.ONECALL.O, 192.614\(c\)\(3\)](#)
 References
 Question Text *Observe operator process a "One Call" ticket.*
 Assets Covered [Cardinal PA](#)
13. Question Result, ID, [Sat, PD.DP.PDPROGRAM.R, 192.614\(c\)](#)
 References
 Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
 Assets Covered [Cardinal PA](#)
 Result Notes [Located in Section 18 Damage Prevention](#)
14. 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 **Cardinal PA**

15. Question Result, ID, References **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 **Cardinal PA**

Result Notes **Viewed Pipeline Patrol Reports**

PD.PA: Public Awareness

16. Question Result, ID, References **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 **Cardinal PA**

Result Notes **Did not have Valves or Odorizer listed**

17. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 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 **Cardinal PA**

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

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

Assets Covered **Cardinal PA**

19. Question Result, ID, References **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 **Cardinal PA**

Result Notes **Program can be accessed online.**

20. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 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 **Cardinal PA**

21. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 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 **Cardinal PA**

22. Question Result, ID, References **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 **Cardinal PA**

23. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))**

Question 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 **Cardinal PA**

24. 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 **Cardinal PA**

25. Question Result, ID, References **Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 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 **Cardinal PA**

26. 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: 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 **Cardinal PA**

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

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 **Cardinal PA**

Result Notes **6.2 Language**

28. 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 **Cardinal PA**

29. Question Result, ID, References **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 **Cardinal PA**

30. Question Result, ID, References **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 **Cardinal PA**

31. Question Result, ID, References **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 **Cardinal PA**

Result Notes **A third party contractor, "The Compliance Group" was utilized**

32. Question Result, ID, References **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 **Cardinal PA**

Result Notes **Using a new third party contractor and no results have been recently tabulated at the time of the inspection**

33. Question Result, ID, References **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 **Cardinal PA**
 Result Notes **Not yet for 2020 but viewed last evaluation from Cosentino Consulting Inc. dated Jan 9, 2017**
34. Question Result, ID, References **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 **Cardinal PA**
 Result Notes **Nothing yet for 2020 but viewed last evaluation from Cosentino Consulting Inc. dated Jan 9, 2017**
35. Question Result, ID, References **Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)**
 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 **Cardinal PA**
 Result Notes **Nothing yet for 2020 but viewed last evaluation from Cosentino Consulting Inc. dated Jan 9, 2017**
36. Question Result, ID, References **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 **Cardinal PA**
 Result Notes **Nothing yet for 2020 but viewed last evaluation from Cosentino Consulting Inc. dated Jan 9, 2017**
37. Question Result, ID, References **Sat, 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 **Cardinal PA**
 Result Notes **Nothing yet for 2020 but viewed last evaluation from Cosentino Consulting Inc. dated Jan 9, 2017**
38. Question Result, ID, References **Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)**
 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 **Cardinal PA**
 Result Notes **Nothing yet for 2020 but viewed last evaluation from Cosentino Consulting Inc. dated Jan 9, 2017**

PD.RW: ROW Markers, Patrols, Monitoring

39. 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 **Cardinal PA**
 Result Notes **7.4 & 7.6 Leakage Survey**
40. 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 **Cardinal PA**
 Result Notes **Viewed Pipeline Patrol Reports for 2018-2019-2020**
41. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)**
 Question Text *Are line markers placed and maintained as required?*
 Assets Covered **Cardinal PA**

42. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))** (also presented in: MO.RW)
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
Assets Covered **Cardinal PA**
43. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: MO.RW)
Question Text *Does the process adequately cover the requirements for placement of ROW markers?*
Assets Covered **Cardinal PA**
Result Notes **18.2 Pipeline Markers**

PD.SP: Special Permits

44. 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 **Cardinal PA**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
45. Question Result, ID, References **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 **Cardinal PA**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
46. Question Result, ID, References **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 **Cardinal PA**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
47. 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 **Cardinal PA**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

Report Parameters: Results: all

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