Form C 8248

UTC Standard Comprehensive Inspection Report
Intrastate Gas Distribution
FORM C: State-Specific Requirements

** THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS DISTRIBUTION OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE RECORDS" and "BASELINE FIELD OBSERVATIONS" MODULE IN THE MOST CURRENT WA-SPECIFIC GD QUESTION SET IN INSPECTION ASSISTANT (IA)

PRINT Form (select "save and keep working" first) PHMSA Advisory Bulletins

Inspector and Operator Information

Inspection ID	Inspection Link	Inspector - Lead	Inspector - Assist
8248	8248	Ritter, Dennis	

Operator	Unit	Records Location - City & State
Avista Corporation	Pullman/Clarkston	Virtual, Clarkston, Pullman WA

Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date
04-12-2021	04-29-2021	

You must include the following in your inspection summary:

***Inspection Scope and Summary**
***Facilities visited and Total AFOD**
*** Summary of Significant Findings**
*** Primary Operator contacts and/or participants**

Inspection Scope and Summary

2021 Unit inspection will be a generalized inspection covering O&M, Corrosion Control, reporting, integrity management, OQ and Public Awareness **with additional integrity related questions asking about dithiazine in the distribution system and Avista's response (if applicable).**

Pullman unit includes the following municipalities: Rosalia, St. John, Endicott, Colfax, Albion, Palouse, Pullman, Colton, Uniontown

Clarkston unit includes the following municipalities: Clarkston, Asotin

Facilities visited and Total AFOD

Reviewed the following records prior to inspection:

April 5, 2021 Monday-Records review, new customer packet and labels, CP-rectifiers Nov 2017 to Nov 2020 0.5 AFOD

April 6, 2021 Tuesday-Records review: CP PSP reads, casings, 9-yr reads, correction of CP deficiencies, Exposed Pipe reports 0.75AFOD

April 7, 2021 Wed-Records review: internal corrosion cut out pipe, AC 3-year monitoring, Emergency Response training, PA program effectiveness 0.5AFOD

April 8, 2021 Thurs- Records review: Code 9 Leak response-emergencies, Regulator Stations annual inspection, Relief Capacity Review, Valve Inspections 0.5 AFOD

April 12, 2021 Monday-Records review: Maps showing DRs, gate stations and farm taps; regulator stations annual inspection/MAOP review 0.3 AFOD

April 19, 2-21 Monday-records review, 0.5 AFOD

Records Inspection Virtual via MS Teams:

April 20, 2021 Tuesday-First formal day of inspection: reviewed reporting, corrosion control, Pressure testing, MAOP, leak surveys, emergency response, leak investigation, review, 1 AFOD

April 21 2021 Wednesday-public awareness effectiveness, damage prevention, leak surveys, odorization, ROW patrolling/marker survey, O&M effectiveness, regulator stations, bridge patrols, service regulators, valves, welding PQR (to be continued), DIMP-diathiazine 1AFOD

April 22, 2021 Thursday-Trouble order reviews, leak orders near foundations, regulator/meter flow and lock up. Discuss Tuesday's field. 0.5 AFOD

Field Inspection:

Note-see inspection or Form R for location

April 26, 2021 Monday-Travel 0.5 AFOD

April 27, 2021 Tuesday-Clarkston and Asotin--Construction records; field--Regulator stations (spent considerable time at 417-would not lock up-diaphragm swap to softer material), casings, CP test stations, rectifiers, valves 1AFOD

April 28, 2021 Wednesday-Pullman, Colton, Uniontown: Industrial meter (Pullman WSU old boiler), Regulator stations, casings, rectifiers, CP Test stations, bridge crossings, gate stations, odorizers, odorant test sites, valves 1 AFOD

April 29, 2021 Thursday-Colfax, Albion, Palouse, LaCrosse, St John, Endicott, Rosalia-Regulator stations, CP Test stations, casings, bridge crossings, patrolling, markers, odorant test sites, valves 1

April 29, 2021 Thursday-exit interview, Rosalia, Randy Bareither, Avista. No issues found during the inspection--both records and field. This was relayed to Randy Bareither after the inspection concluded.

Summary of Significant Findings

No findings noted during the records or field inspections.

Primary Operator contacts and/or participants

Randy Bareither, Pipeline Safety Engineer

Operator executive contact and mailing address for any official correspondence

Heather Rosentrater, Sr VP Energy Delivery and Shared Services

1411 East Mission Avenue PO Box 3727, Spokane, Washington 99220-3727

Instructions and Ratings Definitions

INSTRUCTIONS	INSPECTION RESULTS		
Satisfactory Responses 14	Satisfactory List 1,2,3,4,5,6,7,8,9,10,11,12,14,15,	Unanswered Questions 0	Unanswered Questions List
U - Unsatisfactory	Unsatisfactory Responses 0	Unsatisfactory List	
Area Of Concern	Area of Concern Responses 0	Area of Concern List	
N/A - Not Applicable (does not apply in this inspection)	Not Applicable Responses 3	Not Applicable List 13,16,17	
N/C - Not Checked/Evaluated (was not inspected during this inspection)	Not Checked / Evaluated Responses 0	Not Checked / Evaluated List	

** If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the appropriate "RECORDS/FIELD OBSERVATION: SUMMARY OF REQUIRED COMMENTS" section at the end of this form

INTRASTATE GD RECORDS REVIEW

MAPPING RECORDS

Question #1.

Has the operator provided accurate maps (or updates) of pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

Q1 Reference	1. Result	Q1. Within Scope of this Inspection:
RCW 81.88.080	Satisfactory	

1. Notes

This question exists in updated IA protocols WA.GD.2020.02 (v14.0.0) as **RPT.RR.PIPELINEMAPPING.R**

Dylan Karaus provided Avista email 2/18/21

Question #2.

Do records indicate that the operator appropriately addresses discovered mapping errors, including all mapping errors that have resulted in excavation damage?

Q2 Reference	2. Result	Q2. Within Scope of this Inspection:
WAC 480-93-018	Satisfactory	

2. Notes

3/13/2020 ELM did locate but locate done with incorrect mapping. So Asotin County hit 3/4" stub. Line was corrected on mapping on 3/25/2020.

Only one such issue in Pullman Clarkston district.

Question #3.

Do records indicate that the operator's mapping corrections are made in a timely manner and in accordance with the operator's written procedures?

Q3 Reference	3. Result	Q3. Within Scope of this Inspection:
WAC 480-93-018	Satisfactory	

3. Notes

3/13/2020 ELM did locate but locate done with incorrect mapping. So Asotin County hit 3/4" stub.

Only one such issue in Pullman Clarkston district. Crew has a map correction form N2672 submitted to mapping. Avista Spec 4.11 Sheet 3 requires 6 months to get on maps. Line was corrected on mapping on 3/25/2020.

DAMAGE PREVENTION RECORDS

Question #4

Do records indicate that the operator has and follows a quality assurance program for monitoring the locating and marking of facilities? Do records show that the operator conducts regular field audits of the performance of locators/contractors and takes action when necessary?

Q4 Reference:	4. Results	Q4. Within Scope of this Inspection:
Operator Internal Performance Measures; PHMSA State Program Guidelines	Satisfactory	

4. Notes

Avista has a QA/QC program per Spec 4.61 which audits locating personnel. ELM also has a QA/QC program which audits the locators, accuracy and timliness of locates. Reviewed Avista Audit spreadsheet, 2081, 2019, 2020. Most of the issues are labeling--can't read the paint marks from locators.

Reviewed ELM audits--documentation, ride along, field, failed--documentation, marking, accuracy, missed locates, other for 2019, 2020. Example May 2020, 2500 total audits, 11 failed

Question #5.

Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

Q5 Reference 1	Q5 Reference 2	Q5 Reference 3:	5. Result	Q5. Within Scope of this Inspection:
WAC 480-93-007	WAC 480-93-013	**PHMSA State Program Guidelines**	Satisfactory	

5. Notes

96% on time requirement. Currently at 99% on time. Avista doesn't pay if they don't meet performance indicators. At fault incident, ELM pays 100%. Also pay for excavator down time.

0.18 damages per 1000 locates. This is very low compared to other operators.

Question #6.

Do operator contracted (or organic) locators address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

Q6 Reference 1	Q6 Reference 2	6. Result	Q6. Within Scope of this Inspection:
WAC 480-93-007	WAC 480-93-013	Satisfactory	

6. Notes

ELM performs a large number of audits on their personnel looking for trends. If not performing, they are retrained or let go. Very high turnover in general for locators. ELM let go 4 locators in 2020 for cause. ELM also gets a copy of Avista's independent audits. These go to locator and supervisor for review.

Question #7.

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?

Q7 Reference 1	Q7 Reference 2	7. Result	Q7. Within Scope of this Inspection:
WAC 480-93-007	WAC 480-93-013	Satisfactory	

7. Notes

Damage prevention manager reviews the damage prevention OQ module and reviews the locating evaluation, last completed 5/7/2020. In 2021 Avista has taken over hands on evaluation of locators. Avista Training department will do the evaluation.

Question #8.

Do records indicate that operator locating and excavation practices are in compliance with the requirements for facility owners prescribed by RCW 19.122?

Q8 Reference 1	Q8 Reference 2	8. Result	Q8. Within Scope of this Inspection:
RCW 19.122	WAC 480-93-250	Satisfactory	

8. Notes

Avista tracks 1st and 2nd party damages as well as 3rd party damages. Reviewed 2017-2020 totals which included locator damages (missed locate, inaccurate etc)

Damages/1000 locates 4.31 2019 8.05 2020 Clarkston--due to telecom work in area.

3.41 and 3.13 Pullman

Question #9.

Are locates made within the required timelines specified within RCW 19.122 (2 full business days)? Examine record sample.

Q9 Reference 1	Q9 Reference 2	9. Result	Q9. Within Scope of this Inspection:
RCW 19.122	WAC 480-93-250	Satisfactory	

9. Notes

Reviewed tickets for: 2018, 2019, 2020

Clarkston

18176957 5/2/18 recieved, 5/4/18 complete

18177705 5/2/18 received 5/4/18 complete

Colfax

18197887 5/14/18 received 5/15/18 complete

18292493 Pullman 7/10/18 received 7/11/18 complete

19342407 Palouse 8/7/19 received 8/8/19 complete

19439967 Albion 10/4/19 received 10/7/19 complete

19450984 St John 10/11/19; 10/15/19 called in on weekend

Clarkston

10258351 6/25/2020; 6/29/2020

20381628 0/7/20; 9/8/20

Colton

20198590 5/22/20; 5/26/20

Colfax

20361679 8/26/20; 8/28/20

Question #10.

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

Q10 Reference 1	Q10 Reference 2	10. Result	Q10. Within Scope of this Inspection:
WAC 480-93-007	WAC 480-93-013	Satisfactory	

10. Notes

Brenda Johnson Clarkston/Lewiston

Matthew Graham Pullman Moscow Dec 31, 2019, Dec 31 2022

Lorenzo Ortega Pullman 12/31/21

Ryan Warwick Pullman 12/31/21

Scott Velerio 12/31/21 Pullman/Clarkston

Patrick Martin 12/31/21 Pullman/Clarkston

Brenda Johnston 12/31/23 12/31/20

Question #11.

Do records indicate that the operator has and follows a procedure for leaks caused by excavation damage near buildings such that the procedure adequately addresses the possibility of multiple leaks and underground migration of gas into nearby buildings/structures?

Q11 Reference:	11. Result	Q11. Within Scope of this Inspection:
PHMSA State Program Guidelines Operator Internal Performance Measures	Satisfactory	

11. Notes

From 2019 UTC inspection, Avista added a checkbox in Maximo for "gas within 1' of foundation". There were no checked boxes in 2020 for Pullman Clarkston (all N for no). Reviewed all steel leak records for gas adjacent to foundation. Found 2 in 2019 in Pullman for above ground leaks-did check %gas in ground and was 0 for both.

OPERATIONS & MAINTENANCE RECORDS

Question #12.

Do the operator's leak records indicate that the operator is conducting detailed leak investigations, evaluations, classification, and remedial action/repair prioritization steps in sufficient detail to ensure compliance with WACs 480-93-185, -186, and -18601?

Q12 Reference 1	Q12 Reference 2	Q12 Reference 3	12. Result	Q12. Within Scope of this Inspection:
WAC 480-83-185	WAC 480-93-186	WAC 480-93-18601	Satisfactory	

12. Notes

This question exists in updated IA protocols WA.GD.2020.02 (v14.0.0) in questions MO.RW.LEAKREPAIRTIME.R , MO.RW.LEAKFOLLOW.R MO.RW.DOWNGRADELEAKREPAIR.R

Reviewed the following leak surveys

1 yr annual 3/6/2018

Asotin

1EAA2C-looked at 2 leaks found, graded and WO generated

1EAA60-looked at 1 leak found, graded and WO generated

Clarkston-3/5/2018

1EA60B-Grade 3-18113013

WO1003145380-barholed and found 0% gas-no leak

Grade 3

1EA2DF 3/7/2018, 7/03/2018 repaired

Grade 2 18113032 valve

WO1003151345-barholed found 0% gas after greasing valve

1EA2E5 map sheet

19113087

Meter set Above ground Grade 3

WO1004941704

Grade 3 leak

1EA2D4

113049

WO1008625177-meter set Above grade 3

Pullman

1E2CAA-5 yr window

3/19/2020

Also was surveyed as an annual 2018-2019

1E2D05 5 yr 2015 and 2020, 3/24/2020 and annual (2018 and 2019)

20113322 WO 1008884205

Grade 3 above ground meter set

map correction meter location, 3/20/2020 6/18/2020 661 NW Miles

map correction meter location, 3/20/2020 6/18/2020 718 NW Miles

20113329 WO 1008886299 3/20/2020 grade 3

20113384 WO 1009001076 grade 2 above ground 3/24/2020 8/3/2020

1E29CA

18113689 WO1003306410 Grade 2 below ground 4/18/2018 5/1/2018 repaired 5/8/2018 follow up

425 SE Jordan Pullman

1E29CE

4/15/2019 19113425 WO1005084316 Grade 2

9/23/2019 valve needed grease 2" stl plug valve

10/3/2019 final check no residual

Rosalia

1A974B

4/26/18 1/4/2019 2/18/2020

St John

1AD12C

annual survey 19113573 WO1005107753

4/19/2019 Grade 3 below ground

8/15/2019 no repair

valve no leak 0% 9/5/2019

Endicott 2018, 2019, 2020

1ADC6A

mapping error 4/9/2020 7/24/2020

LaCrosse

1EO788

4/24/2018 annual survey

18113755 WO1003325987 Grade 2

5/24/2018 leak on reg, changed out reg.

Colfax 5 year for 2020 and annuals for Biz dist

1ADFE4

20113873 WO 1009503125 4/13/2020 15 months to repair

Grade 3 below ground, barholed

1/20/21 greased and operated valve 0% gas

18113790 WO1003332496 Above ground leak meterset

Grade 3

1ADFDE

4/18/2019 19113545 WO1005101598 Grade 3 below ground barholed, sewer?

12/5/2019 125 ppm to low to be nat gas--sewer gas

Albion

1E2450 no leaks

4/9/2020

4/18/2019

2/18/2018

Palouse

1AED7B 5/10/2018, 4/17/19, 2/19/2020

19113515 WO1005095530 Grade 3

1AED7F WO 1005098135 valve barholed 0.26% gas

Grade 3 below ground

1AEDB4 HP between Palouse and Albion-no leaks

4/17/2019

5/7/2018

4/7/2020

1E2164

Annual 4/16/2019 4/8/2020 5/3/20128

Colton

1E65F8

18113688 WO1003306356 4/18/2018 aboveground leak Grade 3 meterset

1E6930

5 yr-18113600 WO 1003279536 4/11/2018 above ground Grade 3 meterset

Annual-4/18/2018, 4/9/2019, 3/18/2020

Uniontown

1E6A49

Annual-4/11/2018, 4/9/2019, 3/19/2020

1E6A81

Annual 4/9/2019 3/19/2020

5 year 4/18/2018

Question #13

Do records indicate that shorted conditions are leak surveyed within ninety (90) days of discovery and twice annually, not to exceed 7.5 months thereafter?

Q13 Reference	13. Result	Q13. Within Scope of this Inspection:
WAC 480-93-200	Not Applicable	No such relevant facilities/equipment existed.

13. Notes

This question exists in updated IA protocols WA.GD.2020.02 (v14.0.0) as **MO.RW.CASINGLEAKSURVEY.**

No shorted casings in Clarkston or Pullman 2018 to 2020

REPORTING RECORDS

Question #14.

Did the operator submit a copy of DOT Drug and Alcohol Testing MIS Data Collection Form to the commission when required?

Q14 Reference	14. Result	Q14. Within Scope of this Inspection:
WAC 480-93-200(13)	Satisfactory	

14. Notes

This question exists in updated IA protocols WA.GD.2020.02 (v14.0.0) as **RPT.RR.MISDATAREPORTS.R**

Reviewed 2018, 2019 and 2020 MIS reporting to PHMSA

Question #15

Does the operator file complete Material/Failure Analysis reports as required by WAC 480-93-200 (10)(b) no later than March 15 for the preceding year?

Q15 Reference	15. Result	Q15. Within Scope of this Inspection:
WAC 480-93-200(10)(b)	Satisfactory	

15. Notes

Reviewed Material Failure analysis reports submitted to UTC 2018 to 2020

RECORDS: SUMMARY OF REQUIRED COMMENTS

RECORDS REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

FIELD OBSERVATIONS

Question #16

Are welding procedures located on site where welding is performed?

Q16 Reference	16. Results	Q16. Within Scope of this Inspection:
WAC 480-93-080(1)(e)	Not Applicable	No such activity/condition was observed.

16. Notes

No field welding observed

Question #17

Is the operator using testing equipment necessary to record and document essential variables during welder and procedure testing/qualifications?

Q17 Reference	17. Results	Q17. Within Scope of this Inspection:
WAC 480-93-080(1)(c)	Not Applicable	No such activity/condition was observed.

17. Notes

This question exists in updated IA protocols WA.GD.2020.02 (v14.0.0) **DC.WELDPROCEDURE.ESSENTIAL.R**

No field welding observed

FIELD OBSERVATONS: REQUIRED COMMENTS

FIELD OBSERVATION SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.