Inspection Output (IOR)

Generated on 2022.May.04 16:23

Report Filters
Assets All, excluding items not linked to any asset.
Results All

Inspection Information
Inspection Name 2022-36 AVA GCC Section 114 DIST
Operator(s) AVISTA CORP (31232)
Lead Paulo Pinto
Team Members David Hoy, Cody Cox
Observer(s) Scott Rukke, Bruce Perkins
Director Kevin Hennessy
Status PLANNED
Start Year 2022
System Type GD
Protocol Set ID GD.2022.02
Plan Submitted 03/01/2022
Plan Approval 03/01/2022 by Kevin Hennessy
All Activity Start 02/25/2022
All Activity End 12/30/2022
Inspection Submitted --
Inspection Approval --

Inspection Summary
This inspection will consist of review of company policies and procedures associated with Section 114 updated requirements.

Operator and OPUC Staff (Present During Inspection)
Avista (AVA) Personnel:
- Randy Bareither

Oregon Public Utility Commission (OPUC) Staff:
- David Hoy - Senior Pipeline Safety Analyst
- Cody Cox - Senior Pipeline Safety Analyst
- Paulo Pinto - Damage Prevention Analyst
- Kevin Hennessy - Chief Pipeline Safety, Manager

Scope (Assets)

<table>
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<th>Short Name</th>
<th>Long Name</th>
<th>Asset Type</th>
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1. Percent completion excludes unanswered questions planned as “always observe”.

Plans

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<th>Focus Directives</th>
<th>Involved Groups/Subgroups</th>
<th>Qst Type(s)</th>
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2022-36 AVA GCC Section 114 DIST
Plan Implementations

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<th>Activity Name</th>
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<td>12/30/20 22</td>
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<td>2022- all 36 AV types</td>
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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".
3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

This inspection has no Form data entry.

Results (all values, 20 results)

40 (instead of 20) results are listed due to re-presentation of questions in more than one sub-group.

114.GD: Section 114 - Gas Distribution

1. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.MM)
   Question Text What are your assets comprised of?
   Assets Covered 2022-36 AVA
   Result Notes Natural Gas Transmission and Distribution Facilities (GT and GD)

2. Question Result, ID, References NIC, SRN.114.GASTRANSPORT.S, (also presented in: 114.MM)
   Question Text Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
   Assets Covered 2022-36 AVA
   Result Notes Avista transports natural gas only

3. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.MM)
   Question Text Do you use natural gas-fueled drivers or engines to compress natural gas?
   Assets Covered 2022-36 AVA
   Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
   Avista has no engines/compressors in Oregon

4. Question Result, ID, References NIC, SRN.114.NGUSE.S, (also presented in: 114.MM)
   Question Text Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
   Assets Covered 2022-36 AVA
   Result Notes Avista utilizes natural gas as fuel for inline heaters.

5. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
   Question Text Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?
6. Question Result, ID, References
Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
Assets Covered 2022-36 AVA
Result Notes Avista Gas Standards Manual (GSM) Section 5.11 Leak Survey (Rev. 21)
DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

7. Question Result, ID, References
Sat, 114.114.LKRLSUNEXPTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?
Assets Covered 2022-36 AVA
Result Notes GSM Section 3.17 Purging Pipelines (Rev. 14)
Avista Gas Emergency and Service Handbook (GESH) Section 2 Leak and Odor Investigation (Rev. 22)
DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

8. Question Result, ID, References
Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
Assets Covered 2022-36 AVA
Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

9. Question Result, ID, References
Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?
Assets Covered 2022-36 AVA
Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

10. Question Result, ID, References
Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do procedures define a process to identify, classify, mitigate and repair leaks?
Assets Covered 2022-36 AVA
Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)
Avista Gas Standards Manual (GSM) Section 5.11 Leak Survey (Rev. 21)

11. Question Result, ID, References
Sat, 114.114.LKMITRPLAUF.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?
Assets Covered 2022-36 AVA
Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

12. Question Result, ID, References
Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?
Assets Covered 2022-36 AVA
Result Notes GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

13. Question Result, ID, References
Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?
14. Question Result, ID, References
   Question Text: Do relief valve testing procedures include measures to minimize natural gas releases?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

15. Question Result, ID, References
   Question Text: Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 3.17 Purging Pipelines (Flaring of Natural Gas) (Rev. 14)

16. Question Result, ID, References
   Question Text: Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

17. Question Result, ID, References
   Question Text: What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
   Assets Covered: 2022-36 AVA
   Result Notes: DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

18. Question Result, ID, References
   Question Text: Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
   Assets Covered: 2022-36 AVA
   Result Notes: DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

19. Question Result, ID, References
   Question Text: Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
   Assets Covered: 2022-36 AVA
   Result Notes: DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

Example - Plastic Pipe Replacement Programs (Adyl A)

20. Question Result, ID, References
   Question Text: Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?
   Assets Covered: 2022-36 AVA
   Result Notes: DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

114.MM: Section 114 - Master Meter

21. Question Result, ID, References
   Question Text: What are your assets comprised of?
   Assets Covered: 2022-36 AVA
22. Question Result, ID, References NIC, SRN.114.GASTRANSPORT.S, (also presented in: 114.GD)

Question Text Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?

Assets Covered 2022-36 AVA

Result Notes Avista transports natural gas only

23. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.GD)

Question Text Do you use natural gas-fueled drivers or engines to compress natural gas?

Assets Covered 2022-36 AVA

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Avista has no engines/compressors in Oregon

24. Question Result, ID, References NIC, SRN.114.NGUSE.S, (also presented in: 114.GD)

Question Text Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?

Assets Covered 2022-36 AVA

Result Notes Avista utilizes natural gas as fuel for inline heaters.


Question Text Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?

Assets Covered 2022-36 AVA

Result Notes Avista Gas Standards Manual (GSM) Section 5.11 Leak Survey (Rev. 21)

DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)


Question Text Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

GSM Section 3.17 Purging Pipelines (Rev. 14)

27. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?

Assets Covered 2022-36 AVA

Result Notes Avista Gas Emergency and Service Handbook (GESH) Section 2 Leak and Odor Investigation (Rev. 22)


Question Text Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

29. Question Result, ID, References Sat, 114.114.LKRLSEDETECTLK.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)
   Question Text: Do procedures define a process to identify, classify, mitigate and repair leaks?
   Assets Covered: 2022-36 AVA
   Result Notes: Avista Gas Standards Manual (GSM) Section 5.11 Leak Survey (Rev. 21)

   Question Text: Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?
   Assets Covered: 2022-36 AVA
   Result Notes: DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

32. Question Result, ID, References: Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)
   Question Text: Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

   Question Text: Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

34. Question Result, ID, References: Sat, 114.114.TESTRELIETFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)
   Question Text: Do relief valve testing procedures include measures to minimize natural gas releases?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

   Question Text: Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 3.17 Purging Pipelines (Flaring of Natural Gas) (Rev. 14)

   Question Text: Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
   Assets Covered: 2022-36 AVA
   Result Notes: GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

37. Question Result, ID, References: Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)
   Question Text: What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
   Assets Covered: 2022-36 AVA
   Result Notes: DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

38. Question Result, ID, References: Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)
   Question Text: Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)


Question Text Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

Example - Plastic Pipe Replacement Programs (Adyl A)

40. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.
## Inspection Results (IRR)

*Generated on 2022.May.04 16:21*

- 2022-36 AVA (40)

### Inspection Results Report (ALL Non-Empty Results) - Scp_PK 2022-36 AVA

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<th>Sub-Group</th>
<th>Qst #</th>
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<td>8. 114.114.LKRLSLKDATA.P</td>
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<td>Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?</td>
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<td>Do relief valve testing procedures include measures to minimize natural gas releases?</td>
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<td>114.114.FLARE.P</td>
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<td>Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimizing natural gas emissions?</td>
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### Inspection Results Report (ALL Non-Empty Results) - Scp_PK 2022-36 AVA

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<td>14. 114.114.TESTRELIEFVLV.P</td>
<td>49 U.S.C. 60108(a)</td>
<td>Do relief valve testing procedures include measures to minimize natural gas releases?</td>
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<td>15. 114.114.FLARE.P</td>
<td>49 U.S.C. 60108(a)</td>
<td>Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimizing of natural gas emissions?</td>
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<td>17. 114.LEAKPRONE.LKRLS.P</td>
<td>49 U.S.C. 60108(a)</td>
<td>What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?</td>
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<td>18. 114.LEAKPRONE.LKRLSLKDATA.P</td>
<td>49 U.S.C. 60108(a)</td>
<td>Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?</td>
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<td>19. 114.LEAKPRONE.LKMITGRPREXAMPLE.P</td>
<td>49 U.S.C. 60108(a)</td>
<td>Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?</td>
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<td>20. 114.LEAKPRONE.LKMITGRPROTHER.P</td>
<td>49 U.S.C. 60108(a)</td>
<td>Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?</td>
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</table>

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

### Report Parameters: All non-empty Results

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