

# Inspection Output (IOR)

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## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	GP Camas Section 114 - GT (8524)	Operator(s)	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted	10/28/2022
Status	PLANNED	Lead	David Cullom	Plan Approval	10/28/2022 by Scott Rukke
Start Year	2022	Director	Scott Rukke	All Activity Start	10/27/2022
System Type	GT			All Activity End	10/27/2022
Protocol Set ID	GT.2022.04			Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

Pursuant to 49 U.S.C. 60108(a)(3), as amended by section 114(a) of the PIPES Act of 2020 (Section 114), PHMSA and state authorities with a certification under 49 U.S.C. 60105 will inspect operators' revised O&M plans in calendar year 2022. On 10/27/2022, staff from the Washington Utilities and Transportation Commission concluded a review of Georgia Pacific Consumer Products (Camas) LLC operation and maintenance plan compliance with Section 114 requirements.

Georgia Pacific Consumer Products (Camas) LLC is located at 401 Adams Street in Camas Washington. The Company operates approximately 1 mile of natural gas transmission Pipeline in Clark County Washington beginning at the Williams Pipeline Interconnection in the City of Washougal and ending at the GP Camas Facility. The 10" line was installed in 1993 and is FBE coated. ECDA was performed on the line in 2003 and MFL ILI was used in 2013.

### Facilities visited and Total AFOD

The Section 114 inspection is a plan and procedures inspection and was conducted via MS Teams. It consisted of (1) AFOD.

### Summary of Significant Findings

No probable violations or areas of concern were noted during this inspection.

### Primary Operator contacts and/or participants

Steve Ringquist (Georgia Pacific) Project / MI Engineer (360) 834-8166

Kellen Rosales (Everline) Compliance Program Manager (720) 822-1642

Ron Simmons (Contract Compliance) (316) 737-4824

### Operator executive contact and mailing address for any official correspondence

Shawn Wood

Mill Manager

Georgia-Pacific Consumer Products (Camas) LLC

401 Northeast Adams Street

Camas, WA 98607

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86255	Georgia-Pacific	unit	86255	--	21	21	21	100.0%

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	--	114.GT	P, R, O, S	Detail	--

## Plan Implementations

Activity #	Activity Name	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Qst Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	114 Review	--	10/27/2022	--	114.GT	86255	all types	21	21	21	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	114 Review	COMPLETED	10/29/2022	114 Review	--

## Results (all values, 21 results)

55 (instead of 21) results are listed due to re-presentation of questions in more than one sub-group.

### 114.GT: Section 114 - Gas Transmission

- Question Result, ID, References: **NIC, SRN.114.INSPECTCVRG.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text: *What are your assets comprised of?*  
 Assets Covered: **86255**  
 Result Notes: **The Company operates approximately 1 mile of natural gas transmission Pipeline in Clark County, Washington beginning at the Williams Pipeline Interconnection in the City of Washougal and ending at the GP Camas Facility. The 10" line was installed in 1993 and is FBE coated.**
- Question Result, ID, References: **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text: *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*  
 Assets Covered: **86255**

Result Notes Natural gas is the only commodity transported and it is not a byproduct or constituent of another substance.

3. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.UNGS, 114.GGBOOST)

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

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.

4. Question Result, ID, References NIC, SRN.114.NGUSE.S, (also presented in: 114.UNGS, 114.GGBOOST)

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

Assets Covered 86255

Result Notes They do not per the operator.

5. Question Result, ID, References NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.

6. Question Result, ID, References NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.

7. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)

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

Assets Covered 86255

Result Notes Per Section 7.12 of the GP O&M Manual - "GP Camas must take steps as necessary to minimize fugitive emissions and vented emissions from pipeline facilities. This includes both unintentional and intentional emissions, including releases into the atmosphere due to equipment design or operations/maintenance activities."

GP Camas may address fugitive emissions by:

- Ensuring signs of leaks are being checked for during routine inspections not just during leak surveys.
- Replacing known leak-prone pipes, valves, and other system components.
- Reducing the repair interval for non-hazardous system leaks.
- Shutting down emission source rather than repairing while in service.
- Other actions as determined appropriate by the operator.

8. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

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 86255

Result Notes This is in Section 7.12 of the O&M:

GP Camas may choose to address vented emissions by:

- Reducing pipeline pressure before venting by allowing consumer drawdown.
- Flaring excess gas when practical.
- Installing plugging equipment to shorten the segment of pipeline involved and using isolation valves to minimize impact.
- Using hot taps to make connections to pipelines.
- Using in-line inspection (ILI) or 'smart pig' technologies instead of hydrotests when possible.
- Installing excess flow valves.
- Other actions as determined appropriate by GP Camas.

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

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 86255

Result Notes Section 7.12 - "Fugitive emissions include any unintentional leaks from pipelines, flanges, valves, meter sets, or other equipment. At the time a leak is discovered the Operations Manager should be notified immediately. A plan for remediation shall be developed based on the severity of the leak. Form - 14 can be used to document all leaks."

10. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

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 86255

Result Notes Section 7.12 of the O&M has this guidance for data collection and analysis:

Leak Data Collection & Analysis: All leaks (including unanticipated vented releases and those eliminated by lubrication, adjustment, tightening, or otherwise below thresholds for regulatory reporting), will be investigated to determine their cause. Data collected during the investigation will be analyzed to determine if there is any other location on the line where the same situation may present itself.

11. Question Result, ID, References Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)

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 86255

Result Notes Section 7.12 states: "Additionally, GP Camas may address fugitive emissions by: • Ensuring signs of leaks are being checked for during routine inspections not just during leak surveys." This was discussed and the operator is aware to actively seek out leaks during operation and not just during required leak surveys.

This line has never had a leak per the operator.

12. Question Result, ID, References NA, 114.114.LKMITGRPRREPAIR.P, 49 U.S.C. 60108(a)

Question Text *Do procedures provide alternatives to cutouts (to reduce emissions)?*

Assets Covered 86255

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The operator has not performed cut-outs, but has in their procedure "Alternate options should always be considered and applied when possible before choosing intentional venting." (Section 7.12)

13. Question Result, ID, References **NA, 114.114.TESTESD.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. The operator does not own or operate compressors nor utilize ESD equipment.**
14. Question Result, ID, References **NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. OPP is provided by the supplier.**
15. Question Result, ID, References **Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*  
 Assets Covered **86255**  
 Result Notes **There is a procedure for it in Section 7.12 – Emissions Prevention of O&M, but it not a practice that is or has been performed.**
16. Question Result, ID, References **Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **Section 7.12 - Emissions Prevention in O&M. "Installing plugging equipment to shorten the segment of pipeline involved and using isolation valves to minimize impact."**  
  
**Section 10.3 - Design and construction has details on configuration changes.**
17. Question Result, ID, References **NA, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. The operator does not own or operate compressors.**
18. Question Result, ID, References **NA, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 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 **86255**  
 Result Notes **Section 7.12 – Emissions Prevention of O&M. GP does not have leak prone pipe.**
19. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 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 **86255**  
 Result Notes **Section 7.12 – Emissions Prevention of O&M. No leaks have occurred on this line.**
20. Question Result, ID, References **NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Still contained in Section 7.12 – Emissions Prevention of O&M.**

21. Question Result, ID, NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, References 114.GGBOOST)  
 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 86255  
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review. The pipeline has not had any leaks since its construction.

## 114.UNGS: Section 114 - Underground Natural Gas Storage

22. Question Result, ID, NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GT, 114.GGBOOST)  
 References  
 Question Text *What are your assets comprised of?*  
 Assets Covered 86255  
 Result Notes The Company operates approximately 1 mile of natural gas transmission Pipeline in Clark County, Washington beginning at the Williams Pipeline Interconnection in the City of Washougal and ending at the GP Camas Facility. The 10" line was installed in 1993 and is FBE coated.
23. Question Result, ID, NIC, SRN.114.GASTRANSPORT.S, (also presented in: 114.GT, 114.GGBOOST)  
 References  
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*  
 Assets Covered 86255  
 Result Notes Natural gas is the only commodity transported and it is not a byproduct or constituent of another substance.
24. Question Result, ID, NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.GT, 114.GGBOOST)  
 References  
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*  
 Assets Covered 86255  
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.
25. Question Result, ID, NIC, SRN.114.NGUSE.S, (also presented in: 114.GT, 114.GGBOOST)  
 References  
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*  
 Assets Covered 86255  
 Result Notes They do not per the operator.
26. Question Result, ID, NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
 References  
 Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*  
 Assets Covered 86255  
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.
27. Question Result, ID, NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
 References  
 Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*  
 Assets Covered 86255  
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.
28. Question Result, ID, Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
 References  
 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 86255

Result Notes This is in Section 7.12 of the O&M:

GP Camas may choose to address vented emissions by:

- Reducing pipeline pressure before venting by allowing consumer drawdown.
- Flaring excess gas when practical.
- Installing plugging equipment to shorten the segment of pipeline involved and using isolation valves to minimize impact.
- Using hot taps to make connections to pipelines.
- Using in-line inspection (ILI) or 'smart pig' technologies instead of hydrotests when possible.
- Installing excess flow valves.
- Other actions as determined appropriate by GP Camas.

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

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 86255

Result Notes Section 7.12 - "Fugitive emissions include any unintentional leaks from pipelines, flanges, valves, meter sets, or other equipment. At the time a leak is discovered the Operations Manager should be notified immediately. A plan for remediation shall be developed based on the severity of the leak. Form - 14 can be used to document all leaks."

30. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

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 86255

Result Notes Section 7.12 of the O&M has this guidance for data collection and analysis:

Leak Data Collection & Analysis: All leaks (including unanticipated vented releases and those eliminated by lubrication, adjustment, tightening, or otherwise below thresholds for regulatory reporting), will be investigated to determine their cause. Data collected during the investigation will be analyzed to determine if there is any other location on the line where the same situation may present itself.

31. Question Result, ID, References NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. OPP is provided by the supplier.

32. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*

Assets Covered 86255

Result Notes Section 7.12 - Emissions Prevention in O&M. "Installing plugging equipment to shorten the segment of pipeline involved and using isolation valves to minimize impact."

Section 10.3 - Design and construction has details on configuration changes.

33. Question Result, ID, References NA, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

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 86255

Result Notes Section 7.12 – Emissions Prevention of O&M. GP does not have leak prone pipe.

34. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

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 86255

Result Notes Section 7.12 – Emissions Prevention of O&M. No leaks have occurred on this line.

35. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

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

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Still contained in Section 7.12 – Emissions Prevention of O&M.

36. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

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 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. The pipeline has not had any leaks since its construction.

## 114.GGBOOST: Section 114 - Gas Gathering & Boosting

37. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GT, 114.UNGS)

Question Text *What are your assets comprised of?*

Assets Covered 86255

Result Notes The Company operates approximately 1 mile of natural gas transmission Pipeline in Clark County, Washington beginning at the Williams Pipeline Interconnection in the City of Washougal and ending at the GP Camas Facility. The 10" line was installed in 1993 and is FBE coated.

38. Question Result, ID, References NIC, SRN.114.GASTRANSPORT.S, (also presented in: 114.GT, 114.UNGS)

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

Assets Covered 86255

Result Notes Natural gas is the only commodity transported and it is not a byproduct or constituent of another substance.

39. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.GT, 114.UNGS)

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

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.

40. Question Result, ID, References NIC, SRN.114.NGUSE.S, (also presented in: 114.GT, 114.UNGS)

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

Assets Covered 86255

Result Notes They do not per the operator.



41. Question Result, ID, References **NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.**
42. Question Result, ID, References **NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. No compressors are utilized on this system by the operator. Pressure supplied by Williams is suitable.**
43. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
 Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*  
 Assets Covered **86255**  
 Result Notes **Per Section 7.12 of the GP O&M Manual - "GP Camas must take steps as necessary to minimize fugitive emissions and vented emissions from pipeline facilities. This includes both unintentional and intentional emissions, including releases into the atmosphere due to equipment design or operations/maintenance activities."**
- GP Camas may address fugitive emissions by:
- Ensuring signs of leaks are being checked for during routine inspections not just during leak surveys.
  - Replacing known leak-prone pipes, valves, and other system components.
  - Reducing the repair interval for non-hazardous system leaks.
  - Shutting down emission source rather than repairing while in service.
  - Other actions as determined appropriate by the operator.
44. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
 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 **86255**  
 Result Notes **This is in Section 7.12 of the O&M:**
- GP Camas may choose to address vented emissions by:
- Reducing pipeline pressure before venting by allowing consumer drawdown.
  - Flaring excess gas when practical.
  - Installing plugging equipment to shorten the segment of pipeline involved and using isolation valves to minimize impact.
  - Using hot taps to make connections to pipelines.
  - Using in-line inspection (ILI) or 'smart pig' technologies instead of hydrotests when possible.

- Installing excess flow valves.
- Other actions as determined appropriate by GP Camas.

45. Question Result, ID, References **Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
 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 **86255**  
 Result Notes **Section 7.12 - "Fugitive emissions include any unintentional leaks from pipelines, flanges, valves, meter sets, or other equipment. At the time a leak is discovered the Operations Manager should be notified immediately. A plan for remediation shall be developed based on the severity of the leak. Form - 14 can be used to document all leaks."**
46. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
 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 **86255**  
 Result Notes **Section 7.12 of the O&M has this guidance for data collection and analysis:**  
  
**Leak Data Collection & Analysis: All leaks (including unanticipated vented releases and those eliminated by lubrication, adjustment, tightening, or otherwise below thresholds for regulatory reporting), will be investigated to determine their cause. Data collected during the investigation will be analyzed to determine if there is any other location on the line where the same situation may present itself.**
47. Question Result, ID, References **NA, 114.114.TESTESD.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
 Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. The operator does not own or operate compressors nor utilize ESD equipment.**
48. Question Result, ID, References **NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. OPP is provided by the supplier.**
49. Question Result, ID, References **Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*  
 Assets Covered **86255**  
 Result Notes **There is a procedure for it in Section 7.12 – Emissions Prevention of O&M, but it not a practice that is or has been performed.**
50. Question Result, ID, References **Sat, 114.114.GNLDSGNCFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **Section 7.12 - Emissions Prevention in O&M. "Installing plugging equipment to shorten the segment of pipeline involved and using isolation valves to minimize impact."**  
  
**Section 10.3 - Design and construction has details on configuration changes.**
51. Question Result, ID, References **NA, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
 Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. The operator does not own or operate compressors.

52. Question Result, ID, References NA, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

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 86255

Result Notes Section 7.12 – Emissions Prevention of O&M. GP does not have leak prone pipe.

53. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

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 86255

Result Notes Section 7.12 – Emissions Prevention of O&M. No leaks have occurred on this line.

54. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

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

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Still contained in Section 7.12 – Emissions Prevention of O&M.

55. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

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 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. The pipeline has not had any leaks since its construction.

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