

**Utilities and Transportation Commission
Standard Inspection Report for Master Meter Systems
Records Review and Field Inspection**

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Insp ID / Docket Number	6785		
Inspector Name & Submit Date	Anthony Dorrrough—05/18/2016		
Chief Eng Name & Review/Date	Joe Subsits. 5/25/2016		
Operator Information			
Name of Operator:	Mt Vernon Terrace Apartments	OP ID #:	36954
Name of Unit(s):	[Same]		
Records Location:	3106 S. Mt Vernon St – Bldg. #3		
Date(s) of Last (unit) Inspection:	5/22/2013	Inspection Date(s):	4/27/2016

Inspection Summary:

Mt Vernon Terrace Apartments Master Meter System:

This Master Meter system distributes natural gas from an Avista Utilities (Avista) gas meter to [14] separate buildings. The underground system consists of 440-ft of 4-inch; 1,025-ft of 2-inch and 45-ft of 1-1/4-inch 3M-Scotch-Coated schedule 40 steel pipe; with welded joints; and pressure tested to 60psig. Components list includes; [14] 2-inch Mueller lockable plug valves and Fisher S-302 & S-202 1-1/4-inch service regulators & 289 relief. Cathodic protection provided by 17-lb magnesium sacrificial anodes. System was installed 04/16/1973 by the Washington Water Power Company.

The 2016 Standard Inspection for Mt Vernon Terrace Apartments Master Meter System was conducted in the apartment office building (Bldg#3) where the records are retained and on the apartment complex grounds. An exit interview was held shortly afterward to recap any records and/or field issues.

Field inspection locations are as noted in the Form-R Field Inspection Form. Field assessments were conducted as follows: CP pipe to soil, and atmospheric corrosion at [4] established test point's located at [4] buildings.

The following issues were noted as a result of the inspection:

Staff noted that it had been documented on the Annual Cathodic Protection Survey that two valves (possibly emergency shut-off) located at the Avista meter were frozen (could not be opened or closed). The notation was vague and did not indicate whether or not the comment was referring to the valves on the customer's side. During the inspection Staff could not request to observe the valve being operated as there were no qualified individuals on hand to operate the valve and because there was a fence around the gas meter with a gate that had been locked off. According to Mt Vernon, they do not possess a key to gain access to the area surrounding the meter, which is indicated as the location to shut-down the system in the case of an emergency.

Staff contacted Randy Bariether PE/Pipeline Safety Engineer with Avista in regards to the valves mentioned in the annual survey. Avista was able to verify that the valves in question were indeed Avista valves, and were currently operable and were able to provide the supporting documentation. (see Figure #1 & Image #1)

After completing this investigation staff initiated discussion with Mt. Vernon and Avista Utilities in regards to

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taking steps in the future towards the elimination of this MM system. Avista expressed the willingness to work with Mt. Vernon with the help of staff and the Commission towards a workable, affordable plan.

HQ Address: Irina Robinson Mount Vernon Terrace Apartments 3118 S Mt Vernon Spokane, WA 99207		System/Unit Name & Address: Irina Robinson Mount Vernon Terrace Apartments 3118 S Mt Vernon Spokane, WA 99207	
Co. Official: Phone No.: Fax No.: Emergency Phone No.:		Phone No.: Fax No.: Emergency Phone No.:	
Persons Interviewed	Title		Phone No.
Irina Robinson	Owner/Operator		(509) 999-5366
Gas Supplier: Avista Utilities			

Year Installed (Range)	1973	Pipe Diameters (Range): 4-inch; 2-inch; 1-1/4-inch
Material Type	Schedule 40 Steel	Length of System: 1,425-ft

INSPECTION FORM			S	U	N/A
1.	191.5	Any incidents requiring telephonic reporting to the National Response Center ---Q1-Q4 No incidents since last inspection	X		
2.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification (Within 2 hours)	X		
3.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification (Within 24 hours) for;	X		
4.	480-93-200(4)	30 day written incident report provided to the commission? WAC 480-93-200 (1) and (2).	X		
5.	480-93-200(7)	A copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) annual report required by U.S. Department of Transportation, Office of Pipeline Safety. Note: Master Meter operators <u>not</u> required to submit DOT Form PHMSA F7100.1-1 (192.11(b)) ---Not required for Master Meter operators			X
6.	480-93-200(7)(b)	File a "Damage Prevention Statistics" Report ---No incidents since last inspection	X		
7.	480-93-200(7)(c)	File a construction defects and material failures report ---No new construction since last inspection	X		
8.	480-93-200(8)	Provide emergency contact information to appropriate agencies,	X		
9.	480-93-013	Provide written Operator Qualification Plan for training, qualifying and certifying all employees and contractors	X		
10.	192.739	Copy of Local Gas Company's Regulator Station annual inspection. Overpressure protection designed and installed where required? (192.195) Note: PHMSA interpretation dated 7-23-92 MM ultimately responsible for requirements under 192.743.	X		
11.	480-93-140	Service regulators installed, operated and maintained per manufacturers recommendation (where applicable).	X		
12.	192.355	Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must: (1) Be rain and insect resistant; (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and,(3) Be protected from damage caused by submergence in areas where flooding may occur.	X		
13.	192.616	Written Public Awareness procedure to provide its customers public awareness messages twice annually	X		
14.	CFR Part 199	Copy of written Drug and Alcohol Plan and testing for all contractors.	X		
15.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months)	X		
16.	192.615	Written Emergency Plan	X		
17.	192.617	Written procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.	X		
18.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X		
19.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? Updated records made available to appropriate operations personnel?	X		
20.	192.619	Maximum Allowable Operating Pressure (MAOP) and operating pressures			
21.	192.625 (f)	Odorization of gas Note: Operators of master meter systems may comply with this requirement by- (1) Receiving written verification from their gas source that the gas has the proper concentration of odorant; and ---Mt. Vernon could not provide written verification from Avista but sniff test records provide verification of odorant in the MM system. (2) Conducting periodic "sniff" tests at the extremities of the system to confirm that the gas contains odorant.	X		
22.	480-93-188	Conducted the gas leak surveys in accordance with 480-93-188 and 192.723	X		
23.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X		
24.	192.747	Valve Maintenance – Distribution (1 per yr/15 months) .74	X		

INSPECTION FORM			S	U	N/A
25.	192.455	Systems that do not have cathodic protection (CP) on their steel service must do testing to determine if a corrosive environment exists. If a corrosive environment exists, the Master Meter System must be cathodically protected in accordance with paragraph (a) (2) of this section. 192.465 (e). ---- Cathodic protection provided by 17-lb magnesium sacrificial anodes.	X		
26.	192.465	Have annual cathodic protection surveys been conducted? If there is a anodic cathodic protection system is rectifier monitoring conducted 6 per yr/2½ months, .192465(b)? Is there a sufficient number of test stations. 192.469. ---- [4] test stations located at [4] dead-end legs of the system.	X		
27.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X		
28.	192.453	CP carried out by qualified person: design, installation, operation, and maintenance	X		
29.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed --- All exposed facilities are coated	X		
30.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy and calibrated.	X		
31.	192.481	Atmospheric Corrosion: monitoring	X		
32.	192.721	Patrols conducted as required	X		
33.	192.1015	Was the Master Meter IMP program developed and implemented on or before August 2, 2011?	X		
34.	480-93-018	Maintain records sufficient to demonstrate compliance with all requirements of 49 CFR § 191, 192 and chapter 480-93 WAC: give the commission access to records for review during an inspection and must provide the commission copies of records upon request: update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.	X		
35.					
36.					
37.	480-93-250	Each gas pipeline company must comply with chapter 19.122 RCW, including: (1) Subscribe to the appropriate one-number locator service;	X		

Applicable Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

<u>Number</u> <u>Number</u>	<u>Date</u> <u>Date</u>	<u>Subject</u> <u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB-12-05	Mar 23, 12	Cast Iron Pipe (Supplementary Advisory Bulletin)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>