



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email and Electronic Receipt Return Mail

June 26, 2018

Walter Alexander Moa
Owner
Valley View Motel
162 Highway 20
Port Townsend, WA 98368-9311
w.moa@suite400.net

Dear Mr. Moa:

**RE: 2018 Liquefied Propane Gas System Evaluation and Technical Assistance Inspection
Valley View Motel (Insp. No. 7701)**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Liquefied Propane Gas (LPG) system evaluation and Technical Assistance (TA) inspection on Mar. 19, of Valley View Motel (Valley View). The inspection included a comprehensive field, program and records review of the Valley View system.

Our inspection indicates 25 probable violations for each jurisdictional system as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by July 27. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time. Since this was a system evaluation and technical assistance inspection, we will not pursue a penalty or complaint in this matter at this time.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrough at (360) 664-1318.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

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The following probable violations of Title 49 CFR Part 191, 192, 199, WAC 480-93 and NFPA 58 (2004 Edition) were noted as a result of the 2018 inspection of Valley View Motel (Valley View) LPG system. The inspection included a comprehensive field, program and records review.

PROBABLE VIOLATIONS

1. **WAC 480-93-200(10)(a) Reporting Requirements**

(10) Each gas pipeline company must file with the commission the following annual reports no later than March 15, for the preceding year:

(a) A copy of every Pipeline and Hazardous Material Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety.

Finding:

Valley View failed to file any annual reports with the commission.

2. **WAC 480-93-200(10)(b) Reporting Requirements**

(10) Each gas pipeline company must file with the commission the following annual reports no later than March 15, for the preceding year:

(b) A report detailing all construction defects and material failures resulting in leakage. Each gas pipeline company must categorize the different types of construction defects and material failures anticipated for their system. The report must include the following:

(i) Types and numbers of construction defects; and
(ii) Types and numbers of material failures.

Finding:

Valley View failed to file construction defects and material failures reports with the commission.

3. **49 CFR §192.605 – Procedural Manual for Operations, Maintenance, and Emergencies.**

Each operator shall include the following in its operating and maintenance plan:

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once

each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

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- (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.*
- (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.*
- (3) Making construction records, maps, and operating history available to appropriate operating personnel.*
- (4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.*
- (5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices.*
- (6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service.*
- (7) Starting, operating and shutting down gas compressor units.*
- (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found.*
- (9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.*
- (10) Systematic and routine testing and inspection of pipe-type or bottle-type holders including –*
 - (i) Provision for detecting external corrosion before the strength of the container has been impaired;*
 - (ii) Periodic sampling and testing of gas in storage to determine the dew point of vapors contained in the stored gas which, if condensed, might cause internal corrosion or interfere with the safe operation of the storage plant; and,*
 - (iii) Periodic inspection and testing of pressure limiting equipment to determine that it is in safe operating condition and has adequate capacity.*
- (11) Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under §192.615(a)(3) specifically apply to these reports.*
- (12) Implementing the applicable control room management procedures required by §192.631.*
 - (c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:*

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(1) Responding to, investigating, and correcting the cause of:

- (i) Unintended closure of valves or shutdowns;*
- (ii) Increase or decrease in pressure or flow rate outside normal operating limits;*
- (iii) Loss of communications;*
- (iv) Operation of any safety device; and,*
- (v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.*

(2) Checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.

(3) Notifying responsible operator personnel when notice of an abnormal operation is received.

(4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

(5) The requirements of this paragraph

(c) do not apply to natural gas distribution operators that are operating transmission lines in connection with their distribution system.

(d) Safety-related condition reports.

The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.

(e) Surveillance, emergency response, and accident investigation. The procedures required by §§ 192.613(a), 192.615, and 192.617 must be included in the manual required by paragraph (a) of this section.

Finding:

Valley View failed to provide record of a Procedural Manual for Operations, Maintenance and Emergencies.

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4. **WAC 480-93-200(11) Reporting Requirements**

(11) Each gas pipeline company must file with the commission, and all municipalities where gas pipeline companies have facilities, the names, addresses, and telephone numbers of the responsible officials of the gas pipeline company who may be contacted in the event of an emergency. In the event of any changes in such personnel, the gas pipeline company must immediately notify the commission and municipalities.

Finding:

Valley View failed to file with municipalities and the commission, the names, addresses, and telephone numbers of the responsible officials at Valley View who may be contacted in the event of an emergency.

5. **49 CFR §192.809 General - Operator Qualification Program**

(a) Operators must have written qualification program by April 27, 2001. The program must be available for review by the administrator or by a state agency participating under 49 U.S.C. Chapter 601 if the program is under the authority of the state agency.

(b) Operators must complete the qualification of individuals performing covered tasks by October 28, 2002.

(c) Work performance history review may be used as a sole evaluation method for individuals who were performing a covered task prior to October 26, 1999.

(d) After October 28, 2002, work performance history may not be used as a sole evaluation method.

(e) After December 16, 2004, observation of the on-the-job performance may not be used as the sole method of evaluation.

Finding:

Valley View failed to provide copies of a written operator qualification program.

6. **WAC 480-93-140 Service Regulators**

(1) To ensure proper operation of service regulators, each gas pipeline company must install, operate, and maintain service regulators in accordance with federal and state regulations, and in accordance with the manufacturer's recommended installation and maintenance practices.

(2) Each gas pipeline company must inspect and test service regulators and associated safety devices during the initial turn-on, and when a customer experiences a pressure problem. Testing must include determining the gas regulator's outlet set pressure at a specified flow rate. Each gas pipeline company must use pressure gauges downstream of the regulator during testing. Safety devices such as fracture discs are not required to be tested.

Finding:

Valley View failed to provide any record of regulator inspections or tests.

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7. **49 CFR §192.616(j) Public Awareness**

(j) Unless the operator transports gas as a primary activity, the operator of a master meter or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of this section. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually. If the master meter or petroleum gas system is located on property the operator does not control, the operator must provide similar messages twice annually to persons controlling the property. The public awareness message must include:

- (1) A description of the purpose and reliability of the pipeline;*
- (2) An overview of the hazards of the pipeline and prevention measures used;*
- (3) Information about damage prevention;*
- (4) How to recognize and respond to a leak; and*
- (5) How to get additional information.*

Finding:

Valley View failed to develop and implement a written public awareness procedure.

8. **49 CFR §199 Drug and Alcohol Testing**

This part requires operators of pipeline facilities subject to part 192, 193 or 195 of this chapter to test covered employees for the presence of prohibited drugs and alcohol.

Finding:

Valley View failed to provide a copy of a written drug and alcohol plan for covered employees and records of testing for all contractors.

9. **49 CFR §192.455 External Corrosion Control:**

(a) Except as provided in paragraphs (b), (c), and (f) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following:

- (1) It must have an external protective coating meeting the requirements of §192.461.*
- (2) It must have a cathodic protection system designed to protect the pipeline in accordance with this subpart, installed and placed in operation within 1 year after completion of construction.*

(b) An operator need not comply with paragraph (a) of this section, if the operator can demonstrate by tests, investigation, or experience in the area of application, including, as a minimum, soil resistivity measurements and tests for corrosion accelerating bacteria, that a corrosive environment does not exist. However, within 6 months after an installation made pursuant to the preceding sentence, the operator shall conduct tests, including pipe-to-soil potential measurements with respect to either a continuous reference electrode or an electrode using close spacing, not to exceed 20 feet (6 meters), and soil resistivity measurements at potential

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profile peak locations, to adequately evaluate the potential profile along the entire pipeline. If the tests made indicate that a corrosive condition exists, the pipeline must be cathodically protected in accordance with paragraph (a)(2) of this section.

(c) An operator need not comply with paragraph (a) of this section, if the operator can demonstrate by tests, investigation, or experience that-

(1) For a copper pipeline, a corrosive environment does not exist;
or

(2) For a temporary pipeline with an operating period of service not to exceed 5 years beyond installation, corrosion during the 5-year period of service of the pipeline will not be detrimental to public safety.

(d) Notwithstanding the provisions of paragraph (b) or (c) of this section, if a pipeline is externally coated, it must be cathodically protected in accordance with paragraph (a)(2) of this section.

(e) Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved.

(f) This section does not apply to electrically isolated, metal alloy fittings in plastic pipelines, if:

(1) For the size fitting to be used, an operator can show by test, investigation, or experience in the area of application that adequate corrosion control is provided by the alloy composition; and

(2) The fitting is designed to prevent leakage caused by localized corrosion pitting.

Finding:

Valley View failed to provide records that indicate buried pipelines are protected against external corrosion.

10. **49 CFR §192.465 External Corrosion Control: Monitoring**

(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

(b) Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2½ months, to ensure that it is operating.

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(c) Each reverse current switch, each diode, and each interference bond whose failure would jeopardize structure protection must be electrically checked for proper performance six times each calendar year, but with intervals not exceeding 2½ months. Each other interference bond must be checked at least once each calendar year, but with intervals not exceeding 15 months.

(d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring. (e) After the initial evaluation required by §§ 192.455(b) and (c) and 192.457(b), each operator must, not less than every 3 years at intervals not exceeding 39 months, reevaluate its unprotected pipelines and cathodically protect them in accordance with this subpart in areas in which active corrosion is found. The operator must determine the areas of active corrosion by electrical survey. However, on distribution lines and where an electrical survey is impractical on transmission lines, areas of active corrosion may be determined by other means that include review and analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipeline environment.

Finding:

Valley View failed to provide cathodic protection test records.

11. **49 CFR §192.491 Corrosion Control Records**

(a) Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system. Records or maps showing a stated number of anodes, installed in a stated manner or spacing, need not show specific distances to each buried anode.

(b) Each record or map required by paragraph (a) of this section must be retained for as long as the pipeline remains in service.

(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§ 192.465(a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.

Finding:

Valley View failed to provide any Corrosion Control records.

12. **49 CFR §192.453 General - Corrosion Control**

The corrosion control procedures required by §192.605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods.

Finding:

Valley View failed to provide records of any persons qualified in pipeline corrosion control methods.

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13. **49 CFR §192.723 Distribution Systems: - Leakage Surveys**

(a) Each operator of a distribution system shall conduct periodic leakage surveys in accordance with this section.

(b) The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:

(1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.

(2) A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months. However, for cathodically unprotected distribution lines subject to §192.465(e) on which electrical surveys for corrosion are impractical, a leakage survey must be conducted at least once every 3 calendar years at intervals not exceeding 39 months.

Finding:

Valley View failed to provide records of any gas leak surveys.

14. **WAC 480-93-188 Gas Leak Surveys**

(1) Each gas pipeline company must perform gas leak surveys using a gas detection instrument covering the following areas and circumstances:

(a) Over all mains, services, and transmission lines including the testing of the atmosphere near other utility (gas, electric, telephone, sewer, or water) boxes or manholes, and other underground structures;

(b) Through cracks in paving and sidewalks;

(c) On all above ground piping (may be checked with either a gas detection instrument or with a soap solution);

(d) Where a gas service line exists, the gas pipeline company must conduct a leak survey at the building wall at the point of entrance, using a bar hole if necessary; and

(e) Within all buildings where gas leakage has been detected at the outside wall, at locations where escaping gas could potentially migrate into and accumulate inside the building.

Finding:

Valley View failed to provide records of any gas leak surveys.

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15. **WAC 480-93-188(2) Gas Leak Surveys**

(2) Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.

Finding:

Valley View failed to provide records of accuracy checks, calibration and other maintenance of gas detection instruments.

16. **WAC 480-93-110(3) Corrosion Control**

(3) Cathodic protection equipment and instrumentation must be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then instruments must be tested for accuracy at an appropriate schedule determined by the gas pipeline company.

Finding:

Valley View failed to provide records of accuracy checks, calibration and other maintenance of cathodic protection instrumentation.

17. **WAC 480-93-018 Records**

(1) Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC.
(2) Each gas pipeline company must give the commission access to records for review during an inspection and must provide the commission copies of records upon request.
(3) Each gas pipeline company must maintain a list of forms and databases, including examples where applicable, that specify what records the company maintains. Each gas pipeline company must make this list available to the commission upon request.
(4) Each gas pipeline company must record and maintain records of the actual value of any required reads, tests, surveys or inspections performed. The records must include the name of the person who performed the work and the date the work was performed. The records must also contain information sufficient to determine the location and facilities

involved. Examples of the values to be recorded include, but are not limited to, pipe to soil potential reads, rectifier reads, pressure test levels, and combustible gas indicator reads. A gas pipeline company may not record a range of values unless the measuring device being used provides only a range of values.

(5) Each gas pipeline company must update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.

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(6) If a gas pipeline company believes a record provided to the commission is confidential as that term is defined in WAC 480-07-160(2), the gas pipeline company must follow the procedures in WAC 480-07-160 for designating and treating that record as confidential.

Finding:

Valley View failed to maintain records sufficient to demonstrate compliance with all requirements of 49 C.F.R. §§ 191, 192, 199 and chapter 480-93 WAC.

18. WAC 480-93-250 Damage Prevention

Each gas pipeline company must comply with chapter 19.122 RCW, including:

- (1) Subscribe to the appropriate one-number locator service;*
- (2) Provide, upon receipt of locate notice, reasonably accurate information as to its locatable underground facilities by surface-marking the location of the facilities;*
- (3) Respond with locate markings within two business days after receipt of the notice or within a time mutually agreed upon between the operator and the excavator requesting the utility locate information.*

Finding:

Valley View failed to provide records indicating that they comply with chapter 19.122 RCW.

19. 49 CFR §192.615 Emergency Plans

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

- (1) Receiving, identifying, and classifying notices of events which require immediate response by the operator.*
- (2) Establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials.*
- (3) Prompt and effective response to a notice of each type of emergency, including the following:*
 - (i) Gas detected inside or near a building.*
 - (ii) Fire located near or directly involving a pipeline facility.*
 - (iii) Explosion occurring near or directly involving a pipeline facility.*
- (iv) Natural disaster.*
- (4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.*
- (5) Actions directed toward protecting people first and then property.*
- (6) Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.*
- (7) Making safe any actual or potential hazard to life or property.*

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(8) Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.

(9) Safely restoring any service outage.

(10) Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.

(11) Actions required to be taken by a controller during an emergency in accordance with §192.631.

(b) Each operator shall:

(1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.

(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

(3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:

(1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;

(2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;

(3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,

(4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

Finding:

Valley View failed to completely establish written procedures to minimize the hazard resulting from a gas pipeline emergency.

20. **49 CFR §192.617 Investigation of Failures**

Each operator shall establish 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.

Finding:

Valley View failed to establish procedures for analyzing accidents and failures.

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21. **49 CFR §192.625(f) Odorization of Gas**

(f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable. 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*
- (2) Conducting periodic "sniff" tests at the extremities of the system to confirm that the gas contains odorant.*

Finding:

Valley View failed to provide adequate written verification from the gas source, as well as records of periodic "sniff" tests.

22. **49 CFR §192.481 Atmospheric Corrosion Control: Monitoring**

(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479.

Finding:

Valley View failed to provide any atmospheric Corrosion Control inspection records.

23. **49 CFR §192.721 Distribution Systems: Patrolling**

(a) The frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage, and the consequent hazards to public safety.

(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled—

(1) In business districts, at intervals not exceeding 4½ months, but at least four times each calendar year; and

(2) Outside business districts, at intervals not exceeding 7½ months, but at least twice each calendar year.

Finding:

Valley View failed to provide any patrolling records.

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24. **NFPA 58 5.7.2.8 Pressure Relief Devices**

Each pressure relief valve shall be plainly and permanently marked with the following:

- (1) The pressure in psig at which the valve is set to start-to-leak*
- (2) Rated relieving capacity in cubic feet per minute of air at 60°F (16°C) and 14.7 psia (101 kPa)*
- (3) The manufacturer's name and catalog number*

Finding:

Staff observed that Valley View failed to provide any such markings.

25. **NFPA 58 6.4.5.2 Container Separation Distances**

Loose or piled combustible material and weeds and long dry grass shall be separated from containers by a minimum of 10 ft (3 m).

Finding:

Staff observed combustible material within 10 ft. of the Valley View tank.