

# Inspection Output (IOR)

Generated on 2026.February.26 12:19

## Report Filters

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

Results All

## Inspection Information

Inspection Name	8986_Avista_Spokane STD_2025	Operator(s)	AVISTA CORP (31232)	Plan Submitted	07/21/2025
Status	LOCKED	Lead	Derek Norwood	Plan Approval	07/24/2025 by Dennis Ritter
Start Year	2025	Team Members	Emma Barrett	All Activity Start	06/09/2025
System Type	GD	Observer(s)	David Cullom, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity End	06/26/2025
Protocol Set ID	WA.GD.2024.02	Supervisor	Dennis Ritter	Inspection Submitted	07/24/2025
		Director	Scott Rukke	Inspection Approval	07/25/2025 by Scott Rukke

## Inspection Summary

### Inspection Scope and Summary

This inspections was a standard inspection and included a records review and field inspection of Avista assets in Spokane district. Records reviewed were from 2022 to 2024. Records were provided to WUTC staff via email, were reviewed via Microsoft Teams and in person. Facilities visited included regulator stations, cp test points, casings, bridge crossing, valves and odorant test sites in Spokane, Cheney, Deer Park, Airway Heights, Davenport, Reardan and surrounding areas.

There were two findings as a result of the inspection. One probable violation with regard to review of employee activities during emergencies and one area of concern with regard to documentation of coating repairs.

### Facilities visited and Total AFOD

Records were provided to WUTC staff via email, were reviewed via Microsoft Teams and in person. Facilities visited included regulator stations, CP test points, casing, bridge crossing, valves and odorant test sites in Spokane County.

### Summary of Significant Findings

There were two findings as a result of the inspection. One probable violation with regard to review of employee activities during emergencies and one area of concern with regard to documentation of coating repairs.

### Primary Operator contacts and/or participants

Randy Bareither  
Principal Gas Pipeline Safety Engineer  
Randy.Bareither@Avistacorp.com

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

Josh DiLuciano  
1411 E Mission Ave  
Spokane, WA  
99220

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	90866 (1914)	Avista Utilities Corp-SPOKANE	unit	90866	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Abandoned	186	186	186	186	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.	90866 (1914)	WUTC Standard Inspection	AR, CR, DC, EP, FS, MO, GDIM, LPGIM, PD, RPT, TD, TQ, 114, GENERIC	P, R, O, S	Detail	--

## Plan Implementations

Activity #	Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Records	--	06/09/2025	06/26/2025	--	all planned questions	all assets	P, R	111	111	111	111	100.0%
2	Field Inspection	--	06/23/2025	06/26/2025	--	all planned questions	all assets	O	75	75	75	75	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	Records and Field	COMPLETED	07/16/2025	Records	90866 (1914)

## Results (all values, 186 results)

210 (instead of 186) results are listed due to re-presentation of questions in more than one sub-group.

### AR.PTI: Integrity Assessment Via Pressure Test

1. Question Result, ID, [NA, AR.PTI.EQUIPCALIB.O](#),  
References

Question Text *Is pressure testing equipment calibrated according to calibration schedules and procedures?*

Assets Covered 90866 (1914)

Result Notes No pressure testing during the inspection

2. Question Result, ID, References **NA, AR.PTI.PLASTICPRESSURETEST.O,**  
Question Text *Is plastic pipe installed and backfilled prior to pressure testing?*  
Assets Covered **90866 (1914)**  
Result Notes **No pressure testing during the inspection**

## **AR.RCOM: Repair Criteria (O and M)**

3. Question Result, ID, References **NA, AR.RCOM.REPAIR.R, 192.491(c) (192.487, 192.489)**  
Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*  
Assets Covered **90866 (1914)**  
Result Notes **No internal corrosion found**
4. Question Result, ID, References **NA, AR.RCOM.PLASTICLEAKCLAMP.R, 192.720** (also presented in: MO.GM)  
Question Text *Do records indicate that mechanical leak clamp repairs for plastic pipe are documented with date installed, location, and date of removal?*  
Assets Covered **90866 (1914)**  
Result Notes **No repairs on plastic pipe with mechanical clamps**
5. Question Result, ID, References **NA, AR.RCOM.PLASTICLEAKCLAMP.O, 192.720 (192.605, 192.603)** (also presented in: MO.GM)  
Question Text *Do field observations verify that mechanical leak clamp repairs for plastic pipe were installed and documented properly?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**

## **AR.RMP: Repair Methods and Practices**

6. Question Result, ID, References **Sat, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**  
Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*  
Assets Covered **90866 (1914)**  
Result Notes **Ignition sources removed**  
  
**Fire extinguishers on site for reg station inspections**
7. Question Result, ID, References **Sat, AR.RMP.TESTREINSTATE.R, 192.603(b) (192.725(a), 192.725(b))**  
Question Text *From the review of records, did the operator properly test disconnected service lines?*  
Assets Covered **90866 (1914)**  
Result Notes **Spreadsheet provided spreadsheet with all service reinstatement**  
  
**Spreadsheet included test duration and pressure**  
  
**Spot checked work orders if data was missing**  
  
**Reviewed records for 2022-2024**

## **DC.CO: Construction**

8. Question Result, ID, References **Sat, DC.CO.CLEARANCE.R, 192.325(b) (192.325(c))** (also presented in: DC.PLASTIC)  
Question Text *Do records indicate that mains are installed with clearances specified in 192.325, and (if plastic) installed as to prevent heat damage to the pipe?*  
Assets Covered **90866 (1914)**

Result Notes Construction records reviewed during the inspection indicate that all Avista standards and regulations were followed

Form N-2490 signed by foreman

9. Question Result, ID, References **NA, DC.CO.CLEARANCE.O, 192.325(b) (192.325(c))** (also presented in: DC.PLASTIC)  
Question Text *Do field observations indicate that mains are installed with the clearances specified in 192.325 and (if plastic) installed as to prevent heat damage to the pipe?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**
10. Question Result, ID, References **Sat, DC.CO.PLASTICPIPEPROC.O,**  
Question Text *Is plastic pipe handled, stored and installed in accordance with manufacturer's recommendations, including maximum ultraviolet exposure?*  
Assets Covered **90866 (1914)**  
Result Notes **Inspected pipe stored at the storage yard**  
  
**All pipe was stored appropriately and UV allowance was not exceeded**
11. Question Result, ID, References **Sat, DC.CO.PLASTICPIPESEP.R,**  
Question Text *Do records indicate minimum separation requirements are met for plastic pipelines?*  
Assets Covered **90866 (1914)**  
Result Notes **GSM 3.15 meets all code requirements for separation requirements**  
  
**Construction records reviewed during the inspection indicate that all Avista standards and regulations were followed**  
  
**Form N-2490 signed by foreman**
12. Question Result, ID, References **NA, DC.CO.PLASTICPIPESEP.O,**  
Question Text *Are plastic pipelines installed with the minimum separation from other utilities as required?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**
13. Question Result, ID, References **NA, DC.CO.PLASTICBACKFILL.O,**  
Question Text *Is plastic pipe buried in essentially rock-free material or material recommended by the pipe manufacturer?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**
14. Question Result, ID, References **NA, DC.CO.PLASTICSQUEEZING.O,**  
Question Text *Verify that the operator has limits in place for squeezing plastic pipe.*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**

## **DC.DPCOPP: Design of Pipe - Overpressure Protection**

15. Question Result, ID, References **Sat, DC.DPCOPP.OVERPRESSURE.R, 192.195(a) (192.199, 192.201(a), 192.201(b), 192.201(c))**  
Question Text *Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed drawings of newest stations installed in this district**

Four new stations since 2022

RS 27, RS 31, RS 36 and SSFT 737

Relief capacity is sufficient

## DC.WELDPROCEDURE: Construction Welding Procedures

16. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELD.R, 192.225(a) (192.225(b))**  
Question Text *Do records indicate weld procedures are being qualified in accordance with 192.225?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed weld procedures**  
  
**All had associated procedure qualification**
17. Question Result, ID, References **NA, DC.WELDPROCEDURE.ONSITE.O,**  
Question Text *Are qualified written welding procedures located onsite where welding is being performed?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**
18. Question Result, ID, References **Sat, DC.WELDPROCEDURE.ESSENTIAL.R,**  
Question Text *Do records indicate that essential variables were measured and documented when welders and procedures were qualified?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed welder and procedure qualification records**  
  
**Essential variables were documented**
19. Question Result, ID, References **Sat, DC.WELDPROCEDURE.ESSENTIAL.O,**  
Question Text *Does the operator document essential variables when qualifying welders and weld procedures?*  
Assets Covered **90866 (1914)**  
Result Notes **Did not observe welder qualification but records do document essential variables during qualification**

## DC.DPC: Design of Pipe Components

20. Question Result, ID, References **Sat, DC.DPC.FLANGE.R, 192.147(a) (192.147(b), 192.147(c))**  
Question Text *Do records indicate flanges and flange accessories meet the requirements of 192.147?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed Avista's Gas Materials Catalog V4 for approved flanges and accessories, All were ANSI B16.5 rated**  
  
**All flanges used by Avista can be found in the Avista Gas Materials Catalog. All meet specifications ASME/ANSI B16.5. ANSI 150 can be used up to a MAOP of 275 psig. ANSI 300 can be used up to 720 psig. With regard to specification MSS-SP-44, that specification covers flanges 12" and greater in size which are not an inventory item for Avista.**
21. Question Result, ID, References **NA, DC.DPC.FLANGE.O, 192.141 (192.147(a), 192.147(b), 192.147(c))**  
Question Text *Do flanges and flange accessories meet the requirements of 192.147?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**
22. Question Result, ID, References **Sat, DC.DPC.GDVALVEPLACEMENT.O, 192.141 (192.181(a), 192.181(b), 192.181(c))**  
Question Text *Are distribution line valves being installed as required of 192.181?*

## DC.MO: Maintenance and Operations

23. Question Result, ID, References **Sat, DC.MO.MAOPLIMIT.O, 192.605(b)(5)**  
Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*  
Assets Covered 90866 (1914)  
Result Notes **Pressure was monitored when stations were shut-in**

## DC.MA: Materials

24. Question Result, ID, References **Sat, DC.MA.MARKING.R, 192.63** (also presented in: DC.PLASTIC)  
Question Text *Do records indicate that pipe, valves, and fittings were marked as required?*  
Assets Covered 90866 (1914)  
Result Notes **Checked all pipe in the storage yard**  
  
**Pipe was stamped with manufacturing data**  
  
**No pipe exceeded UV exposure limit**
25. Question Result, ID, References **Sat, DC.MA.MARKING.O, 192.63(a) (192.63(b), 192.63(c), 192.63(d))**  
Question Text *Are pipe, valves, and fittings properly marked for identification in accordance with the requirements of 192.63?*  
Assets Covered 90866 (1914)  
Result Notes **All pipe and fittings in the storage yard were marked appropriately**

## DC.METERREGSVC: Meters, Service Regulators, and Service Lines

26. Question Result, ID, References **Sat, DC.METERREGSVC.CUSTOMETERREGLOC.O, 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))**  
Question Text *Are meters and service regulators being located consistent with the requirements of 192.353?*  
Assets Covered 90866 (1914)  
Result Notes **All meters visited were placed appropriately**
27. Question Result, ID, References **Sat, DC.METERREGSVC.CUSTOMETERREGPROT.O, 192.351 (192.355(a), 192.355(b), 192.355(c))**  
Question Text *Are meters and service regulators being protected from damage consistent with the requirements of 192.355?*  
Assets Covered 90866 (1914)  
Result Notes **All meters inspected were low risk of damage or had extra protection**
28. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETERREGINSTALL.O, 192.351 (192.357(a), 192.357(b), 192.357(c), 192.357(d))**  
Question Text *Based on the meters and service regulators observed being installed, are the installations consistent with the requirements of §192.357?*  
Assets Covered 90866 (1914)  
Result Notes **No such activity/condition was observed during the inspection.**
29. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETEROPPRESS.O, 192.351 (192.359(a), 192.359(b), 192.359(c))**  
Question Text *Are customer meter operating pressures consistent with the requirements of 192.359?*  
Assets Covered 90866 (1914)  
Result Notes **No such activity/condition was observed during the inspection.**
30. Question Result, ID, References **NA, DC.METERREGSVC.SVCLINEINSTALL.O, 192.351 (192.361(a), 192.361(b), 192.361(c), 192.361(d), 192.361(e), 192.361(f), 192.361(g))**

Question Text *Are customer service lines being installed consistent with the requirements of 192.361?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

31. Question Result, ID, NA, DC.METERREGSVC.SVCLINEVLLOCATEREQT.O, 192.351 (192.363(a), 192.363(b), 192.363(c),  
References 192.365(a), 192.365(b), 192.365(c))

Question Text *Are customer service line valves being installed meeting the valve and locations requirements of 192.363 and 192.365?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

32. Question Result, ID, NA, DC.METERREGSVC.SVCLINECONNECT.O, 192.351 (192.367(a), 192.367(b), 192.369(a), 192.369(b))  
References

Question Text *Are customer service lines being installed with connections meeting the requirements of 192.367 and 192.369?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

33. Question Result, ID, NA, DC.METERREGSVC.SVCLINEMATERIAL.O, 192.351 (192.371, 192.373(a), 192.373(b), 192.373(c),  
References 192.375(a), 192.375(b), 192.377)

Question Text *Are customer service lines being installed constructed appropriately for the types of materials used?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

34. Question Result, ID, NA, DC.METERREGSVC.NEWSVCLINENOTUSED.O, 192.351 (192.379, 192.379(a), 192.379(b),  
References 192.379(c))

Question Text *Are new customer service lines not in use configured in accordance with the requirements of 192.379?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

35. Question Result, ID, NA, DC.METERREGSVC.EXCSFLOWVLVLOCATE.O, 192.351 (192.381(c), 192.381(d), 192.381(e))  
References

Question Text *Are service line excess flow valves located and identified in accordance with the requirements of 192.381?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

36. Question Result, ID, Sat, DC.METERREGSVC.REGTEST.R,  
References

Question Text *Do records indicate that service regulators have been installed, operated, maintained, tested during initial turn-on and tested when customers experience pressure problems?*

Assets Covered 90866 (1914)

Result Notes All meters and regulators tested during turn-on

Reviewed spreadsheet with testing details

2022-2024

37. Question Result, ID, NA, DC.METERREGSVC.REGTEST.O,  
References

Question Text *Are service regulators operated, maintained, installed and tested during the initial turn-on in accordance with manufacturer's recommendations and WAC requirements?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

## DC.PT: Pressure Testing

38. Question Result, ID, Sat, DC.PT.SERVICELINE.R, 192.517(b) (192.511(a), 192.511(b), 192.511(c))  
References

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.511?*

Assets Covered 90866 (1914)

Result Notes Able to see all new installs during this inspection period from Avista GIS

Pipe asset documents pressure test details

Spot checked throughout the unit for new installations from 2022-2024

## DC.PTLOWPRESS: Pressure Testing - Low Pressure

39. Question Result, ID, References Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.517(a) (192.507(a), 192.507(b), 192.507(c))

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.507?*

Assets Covered 90866 (1914)

Result Notes Able to see all new installs during this inspection period from Avista GIS

Pipe asset documents pressure test details

Spot checked throughout the unit for new installations from 2022-2024

40. Question Result, ID, References Sat, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.517(b) (192.509(a), 192.509(b))

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.509(a) (except for service lines and plastic pipelines)?*

Assets Covered 90866 (1914)

Result Notes Able to see all new installs during this inspection period from Avista GIS

Pipe asset documents pressure test details

Spot checked throughout the unit for new installations from 2022-2024

## DC.PLASTIC: Plastic Pipe Construction

41. Question Result, ID, References Sat, DC.PLASTIC.DESIGNPRESSPLASTIC.R, 192.121

Question Text *Do design records and drawings indicate the design pressure for plastic pipe is determined in accordance with the formulas in §192.121?*

Assets Covered 90866 (1914)

Result Notes PE Pipe Extract from Stock Item List and GSM 2.13 identify which pipe is approved for use in PE installation

42. Question Result, ID, References Sat, DC.PLASTIC.PLASTICSPECS.R, 192.53 (192.59)

Question Text *Do records indicate that plastic pipe is qualified in accordance with §192.59?*

Assets Covered 90866 (1914)

Result Notes GSM Section 2.13 specifies the design requirements

Avista provided Stock Item List for PE Pipe

Approved pipe specifications are ASTM D2513 for PE Pipe and Fittings, ASTM F1055 for Electrofusion fittings, and ASTM F1978 for mettallc mechanical fittings for PE pipe

43. Question Result, ID, References Sat, DC.PLASTIC.PLASTICSPECS.O, 192.53 (192.59)

Question Text *Do field observations confirm the plastic pipe meets the requirements of §192.53 and applicable requirements of this subpart?*

Assets Covered 90866 (1914)

Result Notes Pipe in the storage yard meets requirements in 192.53 and is consistent with what we have seen installed in the field

44. Question Result, ID, References Sat, DC.PLASTIC.PLASTICFITTING.R, 192.143(c) (192.149(c))

Question Text *Do records indicate that plastic components and fittings are able to withstand operating pressures and other anticipated loads in accordance with a listed specification?*

Assets Covered 90866 (1914)

Result Notes Reviewed Avista Gas Materials Catalog

Pipe and components are included and comply with various specification

ASTM D2513, ASTM F1055, ASTM F1924, ASTM F1973 etc.

45. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINT.R, 192.281(a) (192.281(b), 192.281(c), 192.281(d), 192.281(e))

Question Text *As applicable to the project, do records indicate that plastic pipe joints are installed in accordance with the requirements §192.281?*

Assets Covered 90866 (1914)

Result Notes Records indicate that all procedures were followed and personnel were qualified

Avista has adopted Performance Pipe's procedure for butt fusion (PP-750)

GSM 3.23, 3.24, and 3.25

Form N-2490 signed by foreman

46. Question Result, ID, References NA, DC.PLASTIC.PLASTICJOINT.O, 192.281

Question Text *As applicable to the project, are plastic pipe joints installed in accordance with the requirements 192.281?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

47. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTPROCEDURE.R, 192.273(b) (192.283(a), 192.283(b), 192.283(c))

Question Text *Have plastic pipe joining procedures been qualified in accordance with 192.283?*

Assets Covered 90866 (1914)

Result Notes Avista has adopted Performance Pipe's procedure for butt fusion (PP-750)

GSM 3.23, 3.24, and 3.25

48. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTQUAL.R, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.285(e), 192.807(a), 192.807(b))

Question Text *Do records indicate persons making joints in plastic pipelines are qualified in accordance with §192.285?*

Assets Covered 90866 (1914)

Result Notes Reviewed joiner qualifications from 2022-2024

49. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTINSP.R, 192.287 (192.807(a), 192.807(b))

Question Text *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?*

Assets Covered 90866 (1914)

Result Notes Included as part of PE joining qualifications

Reviewed joiner qualifications

50. Question Result, ID, References NA, DC.PLASTIC.PLASTICJOINTINSP.O, 192.287 (192.807(b))

Question Text *Do person(s) inspecting joints in plastic pipelines demonstrate they are qualified to evaluate the acceptability of plastic pipe joints?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

51. Question Result, ID, References Sat, DC.PLASTIC.INSTALLPLASTIC.R, 192.321(a) (192.321(b), 192.321(c), 192.321(d), 192.321(e), 192.321(f), 192.321(g), 192.321(h), 192.321(i))

Question Text *Do records indicate plastic pipe was installed as required by 192.321?*

Assets Covered 90866 (1914)

Result Notes Records indicate that all procedures were followed and personnel were qualified

Avista has adopted Performance Pipe's procedure for butt fusion (PP-750)

GSM 3.23, 3.24, and 3.25

Form N-2490 signed by foreman

52. Question Result, ID, NA, DC.PLASTIC.INSTALLPLASTIC.O, 192.321(a) (192.321(b), 192.321(c), 192.321(d), 192.321(e),  
References 192.321(f), 192.321(g), 192.321(h), 192.321(i))  
Question Text *Do field observations confirm the plastic pipe is installed as required by 192.321?*  
Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.
53. Question Result, ID, NA, DC.PLASTIC.PLASTICWEAKLINK.O, 192.329(b) (192.376(b), 192.303)  
References  
Question Text *Do field observations confirm plastic lines and plastic service lines are being installed using a "weak link" (as defined by §192.3) to ensure the pipeline will not be damaged by any excessive forces during the pulling process?*  
Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.
54. Question Result, ID, NA, DC.PLASTIC.BENDPLASTIC.O, 192.313(d) (192.605, 192.603)  
References  
Question Text *Do field observations confirm that the correct plastic pipe bend radius is being used in the field during construction?*  
Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.
55. Question Result, ID, NA, DC.PLASTIC.REPAIRPLASTIC.O, 192.311  
References  
Question Text *Do field observations verify imperfections or damage of plastic pipe are repaired or removed?*  
Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.
56. Question Result, ID, Sat, DC.PLASTIC.PRESSTESTPLASTIC.R, 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))  
References  
Question Text *Do records indicate that pressure testing is conducted in accordance with 192.513?*  
Assets Covered 90866 (1914)  
Result Notes Able to see all new installs during this inspection period from Avista GIS  
  
Pipe asset documents pressure test details  
  
Spot checked throughout the unit for new installations from 2022-2024
57. Question Result, ID, NA, DC.PLASTIC.PRESSTESTPLASTIC.O, 192.513(a) (192.143(a), 192.513(b), 192.513(c), 192.513(d),  
References 192.143(b), 192.143(c))  
Question Text *Do field observations confirm that sections of a plastic pipeline are tested in accordance with the requirements of 192.513?*  
Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.
58. Question Result, ID, Sat, DC.PLASTIC.PLASTICHANDLING.R, 192.69 (192.59, 192.63(e), 192.321(g)) (also presented in:  
References DC.MO)  
Question Text *Do records indicate that the storage and handling of plastic pipe and associated plastic components were in accordance with noted procedures and applicable standards?*  
Assets Covered 90866 (1914)  
Result Notes Checked all pipe in the storage yard  
  
Pipe was stamped with manufacturing data

No pipe exceeded UV exposure limit

59. Question Result, ID, References Sat, DC.PLASTIC.PLASTICHANDLING.O, 192.69 (192.59, 192.63(e), 192.65, 192.67) (also presented in: DC.MO)  
Question Text *Do field observations confirm plastic materials are stored and handled to ensure compliance with operator procedures?*  
Assets Covered 90866 (1914)  
Result Notes Inspected pipe stored at the storage yard

All pipe was stored appropriately and UV allowance was not exceeded

## EP.ERG: Emergency Response

60. Question Result, ID, References Sat, EP.ERG.INCIDENTANALYSIS.R, 192.605(a) (192.617)  
Question Text *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?*  
Assets Covered 90866 (1914)  
Result Notes 30-day report sent to PHMSA for Crestline Incident in 2022

Assessments as specified in GSM 4.62

Two in 2023, none in 2022 or 2024

10/31/23

Left bypass valve in closed position

Loss of service to commercial business

Replacing leaking plug valve, crew had to bypass to repair

Bypass valve downstream of gauge so crew thought pressure was good

Error Precursors: Time (Halloween), monotony, distractions/interruptions

Org Recommendations: ensure all equipment is in correct config, ensure emergency procedures followed

5/3/23

Nothing bad happened but this is an opportunity to review procedures

Heath leak survey found Grade 1 leak

Or recommendations: review, improve and define pre-EOP initiation, Develop a list of situations, Develop and train employees, etc.

Mock emergency in 2025 using new processes

61. Question Result, ID, References Sat, EP.ERG.TRAINING.R, 192.605(a) (192.615(b)(2))  
Question Text *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?*  
Assets Covered 90866 (1914)  
Result Notes Emergency Response training completed every 3 years

Completed along with other emergency OQ tasks

Refresher Course completion records reviewed

Combination of in-person training at annual Refresher Training and a Computer Based Training

Mock emergency in 2023 at Farwell elementary school

Car vs Reg Station mock emergency in 2022

Car hit meter drill in 2024

62. Question Result, ID, References **Unsat**, EP.ERG.POSTEVTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered 90866 (1914)

Result Issue Summary Avista reviews a sampling of gas trouble orders but does not maintain records or have a process in place to review employee activities for each emergency. Section 13 of Avista's Gas Emergency and Service Handbook (GESH) states: "It is the responsibility of Operations Managers to periodically review employee responses to emergencies to determine if applicable procedures were followed and if the procedures are effective." The GESH further specifies that "each Operations Manager should complete one Emergency Procedures evaluation per quarter per crew." However, this practice does not satisfy the requirements of 49 CFR 192.615(b)(3), which requires that operators review employee activities to determine whether procedures were effectively followed in each emergency. Avista should revise its procedures to ensure compliance with this regulation and maintain records that demonstrate compliance with this code requirement.

Standard Issues B1 (Moderate or small impact/widespread occurrence) : 192.615(b)(3) : Documentation insufficient to demonstrate compliance with specific regulation.

Result Notes Avista reviews a sampling of gas trouble orders but does not maintain records or have a process in place to review employee activities for **each** emergency. Section 13 of Avista's Gas Emergency and Service Handbook (GESH) states: "It is the responsibility of Operations Managers to periodically review employee responses to emergencies to determine if applicable procedures were followed and if the procedures are effective." The GESH further specifies that "each Operations Manager should complete one Emergency Procedures evaluation per quarter per crew." However, this practice does not satisfy the requirements of 49 CFR 192.615(b)(3), which requires that operators review employee activities to determine whether procedures were effectively followed in **each** emergency. Avista should revise its procedures to ensure compliance with this regulation and maintain records that demonstrate compliance with this code requirement.

63. Question Result, ID, References **Sat**, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-2005-03) (also presented in: PD.PA)

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers in accordance with procedures?*

Assets Covered 90866 (1914)

Result Notes 2023 presentation with Spokane Public Works

2023 Contractor Breakfast

2022 Excavator Training in Cheney/Airway Heights

2022 First Responder Training

2022 Paradigm Lunch - Safety Around Gas

2024 Mock Emergency

2024 Spokane FD

2024 Spokane Valley Training on Gas Emergency Response

2024 Trench Safety with FD

## FS.FG: Facilities General

64. Question Result, ID, References **Sat, FS.FG.CASINGTESTLEAD.R,**  
 Question Text *Do records indicate that all casings without vents installed after September 5, 1992 had separate test lead wires installed?*  
 Assets Covered **90866 (1914)**  
 Result Notes **One new casing installed during this inspection period**
- Reviewed job packet and saw that test leads were installed**
65. Question Result, ID, References **Sat, FS.FG.CASINGSEALS.R,**  
 Question Text *Do records indicate that mains and service lines installed in casing or conduit are sealed at the ends as required?*  
 Assets Covered **90866 (1914)**  
 Result Notes **Reviewed a sample of construction jobs where conduit or casing was sealed**
- One new casing in Spokane district, casing seals installed at each end**
- Conduit for services are sealed with foam**
66. Question Result, ID, References **Sat, FS.FG.CASING.O,**  
 Question Text *Are all casings bare steel and do they have test leads installed on new casings without vents?*  
 Assets Covered **90866 (1914)**  
 Result Notes **All casings inspected has test leads to check for isolation**
67. Question Result, ID, References **NA, FS.FG.CASESEAL.O,**  
 Question Text *Does the operator seal both ends of casings/conduits for mains and transmission lines and seal the end nearest the building for service lines?*  
 Assets Covered **90866 (1914)**  
 Result Notes **No such activity/condition was observed during the inspection.**

## **MO.GOABNORMAL: Gas Pipeline Abnormal Operations**

68. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))**  
 Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*  
 Assets Covered **90866 (1914)**  
 Result Notes **Not applicable to LDCs**

## **MO.GOCLASS: Gas Pipeline Class Location**

69. Question Result, ID, References **NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))**  
 Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*  
 Assets Covered **90866 (1914)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **MO.GOMAOP: Gas Pipeline MAOP**

70. Question Result, ID, References **Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.619(a) (192.619(b), 192.621(a), 192.621(b), 192.623(a), 192.623(b))**  
 Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*  
 Assets Covered **90866 (1914)**

Result Notes Reviewed MAOP records for new installations

GIS can display all relevant information for each

Spot checked new installs and historical HP pressure test records

Cheney Pipeline installed in 1965 with uprate in 1997

Pressure test records were available

## MO.GM: Gas Pipeline Maintenance

71. Question Result, ID, References Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))

Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*

Assets Covered 90866 (1914)

Result Notes Gas tailboard forms cover ignition sources, completed by work crews each day

GSM Section 3.17 and 4.31 discuss Accidental ignitions

72. Question Result, ID, References Sat, MO.GM.DISTVALVEINSPECT.R, 192.603(b) (192.747(a), 192.747(b))

Question Text *Do records indicate proper inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?*

Assets Covered 90866 (1914)

Result Notes Reviewed valve maintenance spreadsheet for 2022-2024

Maintenance and operation completed annually NTE 15 months

73. Question Result, ID, References Sat, MO.GM.DISTVALVEINSPECT.O, 192.747(a) (192.747(b))

Question Text *Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?*

Assets Covered 90866 (1914)

Result Notes Many valves visited during the inspection

All were in good condition and operable

See Form R for details

74. Question Result, ID, References Sat, MO.GM.EQUIPPLASTICJOINT.R, 192.603(b) (192.756) (also presented in: DC.PLASTIC)

Question Text *Do records indicate equipment used in joining plastic pipe by heat fusion was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*

Assets Covered 90866 (1914)

Result Notes GSM 3.23

Heating Tool

Pg 3

Periodically check using ice water

Infrared Temp Gun

Milwaukee 2267-20

No specifics on calibration

75. Question Result, ID, References **NA, MO.GM.EQUIPPLASTICJOINT.O, 192.756** (also presented in: DC.PLASTIC)  
Question Text *Is proper maintenance being performed on equipment used in joining plastic pipe by heat fusion in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**
76. Question Result, ID, References **NA, MO.GM.MOVEANDLOWER.R,**  
Question Text *Do records indicate that a study was prepared before moving or lowering a steel gas pipeline as required?*  
Assets Covered **90866 (1914)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
77. Question Result, ID, References **NA, MO.GM.MOVEANDLOWERSURVEY.R,**  
Question Text *Do records indicate that a leak survey was conducted not more than thirty days after moving and/or lowering a metallic pipeline?*  
Assets Covered **90866 (1914)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
78. Question Result, ID, References **Sat, MO.GM.ONSITEPROCS.O,**  
Question Text *Are procedures applicable to the work being done located onsite where the work is being done?*  
Assets Covered **90866 (1914)**  
Result Notes **All personnel had access to procedures on laptop/phone**

## MO.GOODOR: Gas Pipeline Odorization

79. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))**  
Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*  
Assets Covered **90866 (1914)**  
Result Notes **Odorant tested monthly with DTEX**  
  
**All readily detectable reads were below ~0.4%**  
  
**Completed monthly, reviewed records for 2022 - 2024**
80. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.O, 192.625(a) (192.625(c), 192.625(d), 192.625(e), 192.625(f))**  
Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*  
Assets Covered **90866 (1914)**  
Result Notes **Odorization is good**  
  
**Checked multiple sites**  
  
**All reads were below 1/5 LEL**  
  
**See Form R for details**

## MO.GO: Gas Pipeline Operations

81. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.R, 192.605(b)(3) (192.613(a), 192.613(b), 192.703(b), 192.703(c))**  
(also presented in: PD.RW)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 90866 (1914)

Result Notes Reviewed leak survey and patrolling records for 2022-2024

Hazardous conditions identified during patrolling were properly rectified

Followed up on excessive vegetation, unknown construction, etc.

82. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.O, 192.605(b)(3) (192.613(b), 192.703(a), 192.703(b), 192.703(c))  
References (also presented in: PD.RW)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 90866 (1914)

Result Notes No unsatisfactory conditions found in the field but Avista addresses them as they are found during continuing surveillance

83. Question Result, ID, NA, MO.GO.PURGE.O, 192.629(a) (192.629(b))  
References

Question Text *Are lines being purged in accordance with 192.629?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

84. Question Result, ID, Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)  
References

Question Text *Have annual reviews of the written procedures or processes in the manual been conducted as required?*

Assets Covered 90866 (1914)

Result Notes Manual is currently up-to-date

Last revision was published 1/1/25

Revisions implemented every year on January 1

Reviewed revision log

85. Question Result, ID, Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))  
References

Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered 90866 (1914)

Result Notes GSM 4.61 details QA/QC process

Quality Assurance Audit Form

Audits completed by Sunrise Engineering

Audit checklist has section for were procedures effective and followed

Reviewed a sample of audit forms and completion spreadsheet

86. Question Result, ID, Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))  
References

Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered 90866 (1914)

Result Notes Verified during field inspection

Personnel had access to maps and records

87. Question Result, ID, References **Sat, MO.GO.CUSTNOTIFY.R, 192.16(d) (192.16(a), 192.16(b), 192.16(c))**  
Question Text *Do records indicate the customer notification process satisfies the requirements of 192.16?*  
Assets Covered **90866 (1914)**  
Result Notes **New customers receive information within 90 days of starting service**

**Inlcudes Form N-2645 which has information about customer owned buried piping**

88. Question Result, ID, References **Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))**  
Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*  
Assets Covered **90866 (1914)**  
Result Notes **GESH Section 1**

## **MO.GMOPP: Gas Pipeline Overpressure Protection**

89. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))**  
Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed records for 2022-2024**

**Reviewed calculations for newest regulator station (Station 27) to ensure capacity is adequate**

**Reviewed spreadsheet for annual calculations/equipment verification**

90. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))**  
Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed records for 2022-2024**

**Maintenance performed annually NYE 15 months**

**Some stations had YP identified as an AOC, discussed with Avista.**

**YP is yellow powder, dithiazine**

**Where they have seen it they have added strainers, heaters, etc.**

**Less common that it has been in prior years**

91. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b))**  
Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*  
Assets Covered **90866 (1914)**  
Result Notes **Inspected multiple regulator stations during the field visit**

**All were in good condition**

**Only one station did not lock-up but crew responded appropriately**

**See Form R for details**

92. Question Result, ID, References **NA, MO.GMOPP.PRESSREGMETER.O, 192.741(a) (192.741(b), 192.741(c))**  
Question Text *Are telemetering or recording gauges properly utilized as required for distribution systems?*

Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.

93. Question Result, ID, References NA, MO.GMOPP.MULTIPRESSREG.O,  
Question Text *Are regulator stations installed in a manner to provide protection between regulator stages?*  
Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.

## MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

94. Question Result, ID, References Sat, MO.RW.BUSINESSDIST.R, 192.723(b)(1) (192.721(b)(1), 192.723(a), 192.613)  
Question Text *Do the records clearly identify the areas of operator's distribution system that are considered Business Districts?*  
Assets Covered 90866 (1914)  
Result Notes Reviewed leak survey maps and boundaries

Business district boundaries are consistent with code requirements and field observations

95. Question Result, ID, References Sat, MO.RW.BUSINESSDIST.O, 192.723(b)(1) (192.721(b)(1), 192.723(a), 192.613)  
Question Text *Do field observations indicate Business Districts are properly identified?*  
Assets Covered 90866 (1914)  
Result Notes Business district were observed in the field and seem consistent with records provided by Avista

96. Question Result, ID, References Sat, MO.RW.DISTPATROL.R, 192.603(b) (192.721(a), 192.721(b))  
Question Text *Do records indicate distribution patrolling was conducted as required?*  
Assets Covered 90866 (1914)  
Result Notes

- Spokane 2024 Pg 5, unreported construction, was this followed up on
  - Storage shed installed directly over pipe, Avista got legal involved and they ended up splitting the storage shed down the middle
- Trent & Sullivan to Mission & Progress seems to have vegetation cleanup every year, has this caused any issues? Spokane 2024 Pg 18
  - Tree crew cleared trees along state ROW
  - Maintaining year-to-year

Bridges patrolled 4 times per year NTE 4.5 months

Reviewed records for 2022-2024

HP mains patrolled annually

Reviewed records for 2022-2024

97. Question Result, ID, References Sat, MO.RW.DISTPATROLLEAKAGE.R, 192.603(b) (192.723(a), 192.723(b))  
Question Text *Do records indicate distribution leakage surveys were conducted as required?*  
Assets Covered 90866 (1914)  
Result Notes Reviewed leak survey maps from Avista GIS

Sampled 5 year surveys and annual business district, HOS and HP surveys

All surveys inspected were completed in the required timeframe

Reviewed records from 2022-2024

98. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 90866 (1914)

Result Notes Observed markers where required

99. Question Result, ID, Sat, MO.RW.ROWMARKERABOVE.O, 192.707(c) (CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)

Question Text *Are line markers placed and maintained as required for above ground pipelines?*

Assets Covered 90866 (1914)

Result Notes All stations and bridges had required markers

100. Question Result, ID, Sat, MO.RW.CASINGLEAKSURVEY.R, (also presented in: PD.RW)

Question Text *Do records indicate shorted casings were leak surveyed as required?*

Assets Covered 90866 (1914)

Result Notes There were 7 shorted casing as of 2024 all of which were leak surveyed 2x per year NTE 7.5 months

Reviewed records for 2022-2024

101. Question Result, ID, Sat, MO.RW.LEAKFOLLOW.R, (also presented in: PD.RW)

Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*

Assets Covered 90866 (1914)

Result Notes Reviewed all records of leak follow up for repairs with residual gas

All repairs were followed up within 30 days

Reviewed records for 2022-2024

102. Question Result, ID, NA, MO.RW.DOWNGRADELEAKREPAIR.R, (also presented in: PD.RW)

Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*

Assets Covered 90866 (1914)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

103. Question Result, ID, Sat, MO.RW.LEAKREPAIRTIME.R, (also presented in: PD.RW)

Question Text *Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?*

Assets Covered 90866 (1914)

Result Notes Reviewed a sample of leak orders

Repairs and and follow up completed on time

652 S Mclellan St

Found 5/20/22, repaired 7/5/22

Grade 2A leak

8% Gas

Leak on abandoned portion of service

Cut off at main for repair

8% Gas

1.5 % after repair

Follow up 7/20/22  
5/16/23  
Grade 1  
Repaired immediately  
113 F St  
Aldyl A Cap Broken  
0% after repair  
Above ground leak at high school on customer pipe  
Avista red tagged meter  
Grade 3  
6/6/23  
7/27/23  
0.6% gas in manhole next to meter  
7611 W US2  
Ethane check with IRED  
No natural gas leak found  
Determined to be sewer gas  
Habitual sewer gas detected in Deer Park  
Found 5/24/24  
Followed up on 6/7/24  
Verified no natural gas

104. Question Result, ID, References **Sat, MO.RW.LEAKRECORDS.R**, (also presented in: PD.RW)  
Question Text *Have gas leak records been prepared and maintained as required?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed many leak records**

All records included required info

105. Question Result, ID, References **Sat, MO.RW.MARKERSURVEY.R**, (also presented in: PD.RW)  
Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*  
Assets Covered **90866 (1914)**  
Result Notes **Completed on 5 year cycle**

Five areas completed on a rotating basis

Reviewed records for 2022-2024 and verified not exceeding 63 months

106. Question Result, ID, References **Sat, MO.RW.MARKERREPLACE.R**, (also presented in: PD.RW)  
Question Text *Do records indicate that damaged or missing markers were replaced within forty-five days of discovery?*  
Assets Covered **90866 (1914)**  
Result Notes **Markers are replaced at time they are found to be missing/damaged**

Reviewed 5-year marker survey records which showed markers needing to be replaced

107. Question Result, ID, References **Sat, MO.RW.MARKERSMAPSDRAW.R**, (also presented in: PD.RW)  
Question Text *Are records sufficient to indicate class location and other areas where pipeline markers are required?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed maps during the inspection and it seemed clear where markers were necessary**

Markers were placed at all required locations

## MO.GOUPRATE: Uprating

108. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASE.R, 192.553(a) (192.553(b), 192.553(c))**  
Question Text *Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553?*  
Assets Covered **90866 (1914)**  
Result Notes **No uprates during this inspection period**
109. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASELIMIT.R, 192.553(b) (192.553(c), 192.553(d), 192.557(a))**  
Question Text *Do records indicate that increases in MAOP are limited in accordance with 192.619 and 192.621?*  
Assets Covered **90866 (1914)**  
Result Notes **No uprates during this inspection period**
110. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASEPREP.R, 192.553(b) (192.553(c), 192.553(a), 192.557(b), 192.557(c))**  
Question Text *Do records indicate that increases in MAOP were preceded by the actions specified in 192.557?*  
Assets Covered **90866 (1914)**  
Result Notes **No uprates during this inspection period**

## PD.DP: Damage Prevention

111. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.R, 192.614(c)(5)**  
Question Text *Do records indicate that marking proposed excavation sites was completed within two business days and in accordance with RCW 19.122?*  
Assets Covered **90866 (1914)**  
Result Notes **Avista has had some locates that were located beyond the two day requirement but in most cases they were able to provide an explanation**

Avista provides incentives and penalties to the locating contractor for on time and late locates, respectively

ELM was around 96-97% in prior years but since implementing incentive program, they are closer to ~99% on time

2024 data shows that 37,932 out of 38,151 (~99.43%) locates were completed on time in Spokane district

112. Question Result, ID, References **NA, PD.DP.ONECALL.O, 192.614(c)(3)**  
Question Text *Observe operator process a "One Call" ticket.*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

113. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered 90866 (1914)

Result Notes GSM 4.13 is Avista's Damage Prevention Program

This section cover all elements of 192.614(c)

## PD.PA: Public Awareness

114. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 90866 (1914)

Result Notes Viewed brochures and PA program that specifies materials will be presented in English and Spanish

115. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)

Question Text *Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?*

Assets Covered 90866 (1914)

Result Notes 4-year effectiveness evaluation completed in 2021

Reviewed key findings and strategic recommendations

Evaluation being completed this year but not yet complete

116. Question Result, ID, References NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*

Assets Covered 90866 (1914)

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

## RPT.RR: Regulatory Reporting (Traditional)

117. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 191.11(a)

Question Text *Have complete and accurate Annual Reports been submitted?*

Assets Covered 90866 (1914)

Result Notes Reviewed annual reports from 2022-2024

All were submitted by March 15th

118. Question Result, ID, References Sat, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.7(d))

Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*

Assets Covered 90866 (1914)

Result Notes Major outage in 2022 in Spokane

Reported to NRC and UTC

Inspection ID 8498

119. Question Result, ID, References Sat, RPT.RR.INCIDENTREPORT.R, 191.9(a)

Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.1 within the required time frame?*

Assets Covered 90866 (1914)

Result Notes One federal incident in March 2022

Reviewed incident report submitted 04/08/2022

120. Question Result, ID, NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.9(b)  
References

Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*

Assets Covered 90866 (1914)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

121. Question Result, ID, NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(c))  
References

Question Text *Do records indicate safety-related condition reports were filed as required?*

Assets Covered 90866 (1914)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

122. Question Result, ID, Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))  
References

Question Text *Do records indicate appropriate control of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate, and the National Registry of Pipeline and LNG Operators has been notified of applicable changes?*

Assets Covered 90866 (1914)

Result Notes OPID 31232

123. Question Result, ID, Sat, RPT.RR.UTCANNUALREPORTS.R,  
References

Question Text *Have complete and accurate annual reports been submitted to the commission?*

Assets Covered 90866 (1914)

Result Notes Reviewed annual reports from 2022-2024

All were submitted by March 15th

124. Question Result, ID, Sat, RPT.RR.MISDATAREPORTS.R,  
References

Question Text *Has the operator submitted a copy of DOT Drug and Alcohol Testing MIS Data Collection Form to the commission when required?*

Assets Covered 90866 (1914)

Result Notes Reviewed MIS reports from 2022-2024

All were submitted by March 15th

125. Question Result, ID, NA, RPT.RR.MAOPINCREASENOTIFY.R,  
References

Question Text *Do records indicate submittal of a written plan of procedures to the commission at least forty-five days before uprating to a MAOP greater than 60 psig?*

Assets Covered 90866 (1914)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

126. Question Result, ID, Sat, RPT.RR.THIRTYDAYRPT.R,  
References

Question Text *Has the operator submitted a written report within 30 days following each reportable incident?*

Assets Covered 90866 (1914)

Result Notes Reviewed state reportable incidents from 2022-2024

All seem to have 30-day reports submitted on time

127. Question Result, ID, Sat, RPT.RR.DAILYCONSTRUCTIONRPT.R,  
References

Question Text *Do records indicate daily construction and repair activities were emailed to the commission no later than 10 AM each day work is scheduled?*

Assets Covered 90866 (1914)

Result Notes Daily reports sent daily by 10 AM each day

128. Question Result, ID, References Sat, RPT.RR.PIPELINEMAPPING.R,

Question Text *Has the operator provided accurate maps (or updates) of all pipelines operating over 250 psig to specifications developed by the commission sufficient to meet the needs of first responders?*

Assets Covered 90866 (1914)

Result Notes Submitted annually to UTC

Last submission was 2/25/25

## TD.ATM: Atmospheric Corrosion

129. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c))

Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*

Assets Covered 90866 (1914)

Result Notes Reviewed instance of corrosion or damage on riser where repairs had been made

New installations are protected from atmospheric corrosion

130. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d))

Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*

Assets Covered 90866 (1914)

Result Notes Stations and bridges inspected annually

Services and risers inspected every five years

Spokane district is broken into 5 zones

Spot checked various addresses to ensure 5 year interval was met

131. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))

Question Text *Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?*

Assets Covered 90866 (1914)

Result Notes No above ground areas visited had any atmospheric corrosion

## TD.CPMONITOR: External Corrosion - CP Monitoring

132. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a))

Question Text *Do records document that the CP monitoring criteria used was acceptable?*

Assets Covered 90866 (1914)

Result Notes Avista primarily relies on -850 mV criteria but if not met then they will defer to 100 mV shift criteria

They have native/depolarized reads at most locations

133. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c), 192.463(a))

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 90866 (1914)

Result Notes Performed CP reads and casing reads at multiple locations throughout the inspection

Any reads that were greater than -850 mV had a depol read to show that there is >100 mV shift

See Form R for details

134. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))  
Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*  
Assets Covered 90866 (1914)  
Result Notes CP tested annually NTE 15 months
- If read is less negative than -850 mV, then Avista will check Native/Depol reads to verify >100 mV shift
- Did not see any reads that were not followed up on and corrected within 90 days
- Checked records for 2022-2024
135. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))  
Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*  
Assets Covered 90866 (1914)  
Result Notes Reviewed rectifier maintenance records for 2022-2024
- All were completed 6 times per year NTE 2.5 months
136. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)  
Question Text *Do field observations confirm impressed current sources are properly maintained and are functioning properly?*  
Assets Covered 90866 (1914)  
Result Notes Inspected many rectifiers throughout the district
- All were well kept and operating as intended
- See Form R for details
137. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))  
Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*  
Assets Covered 90866 (1914)  
Result Notes Two bond to foreign pipes, one bond to Tesoro and one bond to Yellowstone
- Check bimonthly and 6x per year
- Reviewed records for 2022-2024
138. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)  
Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*  
Assets Covered 90866 (1914)  
Result Notes No such activity/condition was observed during the inspection.
139. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))  
Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*  
Assets Covered 90866 (1914)  
Result Notes Reviewed records of exposed pipe follow-ups
- All deficiencies were followed up within 90 days

140. Question Result, ID, References **Sat, TD.CPMONITOR.TESTSTATION.R, 192.469**  
 Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*  
 Assets Covered **90866 (1914)**  
 Result Notes **Reviewed GIS to determine if there are an adequate number of test points**
141. Question Result, ID, References **Sat, TD.CPMONITOR.TESTSTATION.O, 192.469**  
 Question Text *Do cathodically protected pipelines have a sufficient number of test stations?*  
 Assets Covered **90866 (1914)**  
 Result Notes **Number of test stations in the district seems sufficient**  
**All reads met -850 mV or 100 mV shift criteria**
142. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))**  
 Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*  
 Assets Covered **90866 (1914)**  
 Result Notes **Reviewed a sample of steel jobs where test leads were installed**  
**Crew attested that all company standards were followed**
143. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEAD.O, 192.471(a)**  
 Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*  
 Assets Covered **90866 (1914)**  
 Result Notes **All test leads were functional and in good condition**
144. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))**  
 Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*  
 Assets Covered **90866 (1914)**  
 Result Notes **Avista has one location with AC interference current where they have installed AC mitigation**  
**It in near a casing and has interference during to nearby underground electrical line**  
**Visited this location and verified AC potential with and without PCRX unit connected**  
**See Form R for details**
145. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a)**  
 Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*  
 Assets Covered **90866 (1914)**  
 Result Notes **Visited one location with stray current identified**  
**Avista has installed a PCRX which removes the stray AC current from the line**  
**8.3 V AC without PCRX, 1.7 V AC with PCRX connected**

## **TD.CP: External Corrosion - Cathodic Protection**

146. Question Result, ID, References **Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(f), 192.455(g))**

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*

Assets Covered 90866 (1914)

Result Notes All new lines receive CP when connected to the rest of the system

Checked annual CP records for 2022-2024

147. Question Result, ID, References NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))

Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*

Assets Covered 90866 (1914)

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

148. Question Result, ID, References Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 90866 (1914)

Result Notes Reviewed records for casings and bonds for 2022-2024

CP personnel stated that would see CP issues at stations if there was a short between Avista and the interstate pipeline during their interrupted CP surveys

No such incidents have occurred

149. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 90866 (1914)

Result Notes Inspected casings for isolation

No shorted casings observed during inspection

See Form R for details

150. Question Result, ID, References Sat, TD.CP.ELECISOLATETEST.R, 192.491(c) (192.467(d))

Question Text *Do records adequately document the inspection and electrical testing performed to ensure that electrical isolation is adequate?*

Assets Covered 90866 (1914)

Result Notes Reviewed records for casings and bonds for 2022-2024

CP personnel stated that would see CP issues at stations if there was a short between Avista and the interstate pipeline during their interrupted CP surveys

No such incidents have occurred

151. Question Result, ID, References Sat, TD.CP.ELECISOLATETEST.O, 192.467(d)

Question Text *Do field observations verify that inspection and electrical testing ensured that electrical isolation is adequate?*

Assets Covered 90866 (1914)

Result Notes Inspected casings for isolation

No shorted casings observed during inspection

See Form R for details

152. Question Result, ID, References **Sat, TD.CP.CASINGINSPECT.R,**  
Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*  
Assets Covered **90866 (1914)**  
Result Notes **Casings inspected annually NTE 15 months**

Reviewed records for 2022-2024

Shorted casings were leak surveyed within 90 days of discovery and twice annually

153. Question Result, ID, References **Sat, TD.CP.CASINGINSPECT.O,**  
Question Text *Are casings electrically isolated from the pipeline?*  
Assets Covered **90866 (1914)**  
Result Notes **Inspected casings for isolation**

No shorted casings observed during inspection

See Form R for details

154. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c))** (also presented in: TD.CPMONITOR, TD.CPEXPOSED)  
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*  
Assets Covered **90866 (1914)**  
Result Notes **Verified that all corrosion facilities are mapped**

Checked rectifiers, test points, bonds, ACDC Decoupler, etc.

## **TD.COAT: External Corrosion - Coatings**

155. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))**  
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed records for new construction**

Coating type listed on records

156. Question Result, ID, References **NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(d)**  
Question Text *Is external protective coating being protected from damage that could result from adverse ditch conditions or supporting blocks?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**

## **TD.CPEXPOSED: External Corrosion - Exposed Pipe**

157. Question Result, ID, References **Concern, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)**  
Question Text *Do records adequately document that exposed buried piping was examined for corrosion?*  
Assets Covered **90866 (1914)**  
Result Issue Summary **192.491(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

Result Notes Records do not specify the repair that was made

1026329825

Disbonded wrap at riser, crew re-wrapped and took CP read for exposed pipe, 1/28/22

1026840362

Blue Lake Construction exposed Avista's pipe

Avista opportunistically inspected the pipe and coating

EPCR shows unbonded coating and -1.002 V PSP

1027030822

New service, crew exposed main to install tee.

Nothing stating that pipe was re-wrapped. Attestation stating that Avista procedures/specifications were followed

1027035527

2" Valve replaced, 6' pipe with FBE but no indication that fittings and welds had been wrapped

1027091477

Existing service abandoned and replaced with PE

\*Pipe material list indicates that if hand coated, indicate type of tape wrap or coating

158. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459

Question Text *Is exposed buried piping examined for corrosion and deteriorated coating?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

159. Question Result, ID, References Sat, TD.CPEXPOSED.EXTCORRODEEVAL.R, 192.491(c) (192.487, 192.489)

Question Text *Do records adequately document the evaluation of externally corroded pipe?*

Assets Covered 90866 (1914)

Result Notes Avista provided a spreadsheet with all corrosion found on exposed pipe reports, spot checked work orders to ensure evaluation was completed

1027032047

Low Read, Pitting on service

Light Rust and Light pitting per documentation

1026254864

Atmospheric corrosion found

Dug down 6" and re-wrapped with gray wrap

1027323876

915 N Cedar St Spokane  
Light Rust and Light pitting  
1-1/4" service abandoned  
1027163717  
Pit depth .03" and width .25"  
Light rust and light pitting  
Removed old coating from service riser above final grade  
Wrapped from good coating to final grade  
1033491408  
AC Pitted Riser  
Heavy rust and heavy pitting  
Found pitting >50% above ground  
Replaced riser

160. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODEEVAL.O, 192.487 (192.489)  
References

Question Text *Do field observations verify that externally corroded pipe was adequately evaluated?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

161. Question Result, ID, Sat, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.487, 192.489)  
References

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 90866 (1914)

Result Notes Reviewed a sample of work orders

1027032047  
Low Read, Pitting on service  
Light Rust and Light pitting per documentation  
1026254864  
Atmospheric corrosion found  
Dug down 6" and re-wrapped with gray wrap  
1027323876  
915 N Cedar St Spokane  
Light Rust and Light pitting  
1-1/4" service abandoned

1027163717

Pit depth .03" and width .25"

Light rust and light pitting

Removed old coating from service riser above final grade

Wrapped from good coating to final grade

1033491408

AC Pitted Riser

Heavy rust and heavy pitting

Found pitting >50% above ground

Replaced riser

162. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODREPAIR.O, 192.487 (192.489)  
References

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

## TD.ICP: Internal Corrosion - Preventive Measures

163. Question Result, ID, NA, TD.ICP.CORRGAS.R, 192.491(c) (192.475(a))  
References

Question Text *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*

Assets Covered 90866 (1914)

Result Notes No internal corrosion has been found

164. Question Result, ID, NA, TD.ICP.CORRGASPRVNT.O, 192.475(a)  
References

Question Text *If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

165. Question Result, ID, NA, TD.ICP.CORRGASACTION.R, 192.491(c) (192.477)  
References

Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 90866 (1914)

Result Notes No indications of corrosive gas

166. Question Result, ID, NA, TD.ICP.CORRGASACTION.O, 192.477  
References

Question Text *Are adequate actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

167. Question Result, ID, Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))  
References

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered 90866 (1914)

Result Notes Avista provided record of all cutout with internal inspection

No record of any significant corrosion found

Reviewed records for 2022-2024

168. Question Result, ID, NA, TD.ICP.EVALUATE.R, 192.491(c) (192.487)  
References

Question Text *Do records document adequate evaluation of internally corroded pipe?*

Assets Covered 90866 (1914)

Result Notes No internal corrosion has been found

169. Question Result, ID, NA, TD.ICP.REPAIRINT.R, 192.491(c) (192.487, 192.489)  
References

Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered 90866 (1914)

Result Notes No internal corrosion has been found

170. Question Result, ID, NA, TD.ICP.REPAIRINT.O, 192.487 (192.489)  
References

Question Text *Do field observations confirm repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

## TQ.PROT9: OQ Protocol 9

171. Question Result, ID, NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))  
References

Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered 90866 (1914)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

172. Question Result, ID, Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))  
References

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*

Assets Covered 90866 (1914)

Result Notes Verified OQ during the field inspection

173. Question Result, ID, Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))  
References

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered 90866 (1914)

Result Notes Verified OQ during the field inspection

174. Question Result, ID, Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))  
References

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered 90866 (1914)

Result Notes All personnel were very knowledgeable of the tasks they were performing

Personnel responded appropriately when AOCs were encountered

175. Question Result, ID, Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))  
References

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered 90866 (1914)

Result Notes Verified OQ during the field inspection

## TQ.OQ: Operator Qualification

176. Question Result, ID, References Sat, TQ.OQ.OQPLAN.O, 192.805(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability?*

Assets Covered 90866 (1914)

Result Notes All personnel were very knowledgeable of the tasks they were performing

Personnel responded appropriately when AOCs were encountered

177. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 90866 (1914)

Result Notes Spot checked OQs for various individuals

These include bridge inspectors, fitters, CP technicians, pressure control men, odorant testers, etc.

All were qualified for the tasks they performed

178. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered 90866 (1914)

Result Notes Spot checked OQs for various individuals

These include bridge inspectors, fitters, CP technicians, pressure control men, odorant testers, etc.

All were qualified for the tasks they performed

179. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 90866 (1914)

Result Notes Reviewed OQs for Avista and contractors

Contractors include Michels, Infrasource, Curry Inc., NPL, etc.

180. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b)), 192.803

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 90866 (1914)

Result Notes Personnel have generic AOC task and each task has specific AOCs

181. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.O, 192.803

Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*

Assets Covered 90866 (1914)

Result Notes All personnel were very knowledgeable of the tasks they were performing

Personnel responded appropriately when AOCs were encountered

## TQ.QU: Qualification of Personnel - Specific Requirements

182. Question Result, ID, References **Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))**  
Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed NACE certificates from CP technicians and leads**  
  
**Reviewed OQs for CP personnel**

## TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

183. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**  
Question Text *Do records indicate adequate qualification of welders?*  
Assets Covered **90866 (1914)**  
Result Notes **Welders are re-qualified every 6 months**  
  
**Reviewed records for 2022-2024**
184. Question Result, ID, References **NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**  
Question Text *Do records indicate the qualification of nondestructive testing personnel?*  
Assets Covered **90866 (1914)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
185. Question Result, ID, References **Sat, TQ.QUOMCONST.PLASTIC.R, 192.285(a) (192.285(d), 192.287, 192.807(a), 192.807(b), 192.285(c)) (also presented in: DC.PLASTIC)**  
Question Text *Do records indicate adequate qualification of personnel making/inspecting joints in plastic pipelines?*  
Assets Covered **90866 (1914)**  
Result Notes **Reviewed all fitter qualifications and re-qualifications for 2022-2024**  
  
**Spot checked fitter listed on construction jobs**  
  
**All were qualified at time of construction**
186. Question Result, ID, References **NA, TQ.QUOMCONST.PLASTIC.O, 192.285(a) (192.287, 192.803) (also presented in: DC.PLASTIC)**  
Question Text *Do field observations verify personnel making/inspecting joints in plastic pipelines demonstrate adequate skills and knowledge?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**

## DC.MO: Maintenance and Operations

187. Question Result, ID, References **Sat, DC.PLASTIC.PLASTICHANDLING.R, 192.69 (192.59, 192.63(e), 192.321(g)) (also presented in: DC.PLASTIC)**  
Question Text *Do records indicate that the storage and handling of plastic pipe and associated plastic components were in accordance with noted procedures and applicable standards?*  
Assets Covered **90866 (1914)**  
Result Notes **Checked all pipe in the storage yard**  
  
**Pipe was stamped with manufacturing data**  
  
**No pipe exceeded UV exposure limit**

188. Question Result, ID, **Sat, DC.PLASTIC.PLASTICHANDLING.O, 192.69 (192.59, 192.63(e), 192.65, 192.67)** (also presented in: References DC.PLASTIC)  
Question Text *Do field observations confirm plastic materials are stored and handled to ensure compliance with operator procedures?*  
Assets Covered **90866 (1914)**  
Result Notes **Inspected pipe stored at the storage yard**

**All pipe was stored appropriately and UV allowance was not exceeded**

## **DC.PLASTIC: Plastic Pipe Construction**

189. Question Result, ID, **Sat, DC.MA.MARKING.R, 192.63** (also presented in: DC.MA)  
References  
Question Text *Do records indicate that pipe, valves, and fittings were marked as required?*  
Assets Covered **90866 (1914)**  
Result Notes **Checked all pipe in the storage yard**

**Pipe was stamped with manufacturing data**

**No pipe exceeded UV exposure limit**

190. Question Result, ID, **Sat, DC.CO.CLEARANCE.R, 192.325(b) (192.325(c))** (also presented in: DC.CO)  
References  
Question Text *Do records indicate that mains are installed with clearances specified in 192.325, and (if plastic) installed as to prevent heat damage to the pipe?*  
Assets Covered **90866 (1914)**  
Result Notes **Construction records reviewed during the inspection indicate that all Avista standards and regulations were followed**

**Form N-2490 signed by foreman**

191. Question Result, ID, **NA, DC.CO.CLEARANCE.O, 192.325(b) (192.325(c))** (also presented in: DC.CO)  
References  
Question Text *Do field observations indicate that mains are installed with the clearances specified in 192.325 and (if plastic) installed as to prevent heat damage to the pipe?*  
Assets Covered **90866 (1914)**  
Result Notes **No such activity/condition was observed during the inspection.**

192. Question Result, ID, **Sat, MO.GM.EQUIPPLASTICJOINT.R, 192.603(b) (192.756)** (also presented in: MO.GM)  
References  
Question Text *Do records indicate equipment used in joining plastic pipe by heat fusion was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*  
Assets Covered **90866 (1914)**  
Result Notes **GSM 3.23**

**Heating Tool**

**Pg 3**

**Periodically check using ice water**

**Infrared Temp Gun**

**Milwaukee 2267-20**

**No specifics on calibration**

193. Question Result, ID, **NA, MO.GM.EQUIPPLASTICJOINT.O, 192.756** (also presented in: MO.GM)  
References

Question Text *Is proper maintenance being performed on equipment used in joining plastic pipe by heat fusion in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

194. Question Result, ID, Sat, TQ.QUOMCONST.PLASTIC.R, 192.285(a) (192.285(d), 192.287, 192.807(a), 192.807(b),  
References 192.285(c)) (also presented in: TQ.QUOMCONST)

Question Text *Do records indicate adequate qualification of personnel making/inspecting joints in plastic pipelines?*

Assets Covered 90866 (1914)

Result Notes Reviewed all fitter qualifications and re-qualifications for 2022-2024

Spot checked fitter listed on construction jobs

All were qualified at time of construction

195. Question Result, ID, NA, TQ.QUOMCONST.PLASTIC.O, 192.285(a) (192.287, 192.803) (also presented in: TQ.QUOMCONST)  
References

Question Text *Do field observations verify personnel making/inspecting joints in plastic pipelines demonstrate adequate skills and knowledge?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

## MO.GM: Gas Pipeline Maintenance

196. Question Result, ID, NA, AR.RCOM.PLASTICLEAKCLAMP.R, 192.720 (also presented in: AR.RCOM)  
References

Question Text *Do records indicate that mechanical leak clamp repairs for plastic pipe are documented with date installed, location, and date of removal?*

Assets Covered 90866 (1914)

Result Notes No repairs on plastic pipe with mechanical clamps

197. Question Result, ID, NA, AR.RCOM.PLASTICLEAKCLAMP.O, 192.720 (192.605, 192.603) (also presented in: AR.RCOM)  
References

Question Text *Do field observations verify that mechanical leak clamp repairs for plastic pipe were installed and documented properly?*

Assets Covered 90866 (1914)

Result Notes No such activity/condition was observed during the inspection.

## PD.PA: Public Awareness

198. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4),  
References 192.616(c), ADB-2005-03) (also presented in: EP.ERG)

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers in accordance with procedures?*

Assets Covered 90866 (1914)

Result Notes 2023 presentation with Spokane Public Works

2023 Contractor Breakfast

2022 Excavator Training in Cheney/Airway Heights

2022 First Responder Training

2022 Paradigm Lunch - Safety Around Gas

2024 Mock Emergency

2024 Spokane FD

2024 Spokane Valley Training on Gas Emergency Response

2024 Trench Safety with FD

## PD.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

199. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.R, 192.605\(b\)\(3\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#)  
References (also presented in: MO.GO)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered [90866 \(1914\)](#)

Result Notes [Reviewed leak survey and patrolling records for 2022-2024](#)

[Hazardous conditions identified during patrolling were properly rectified](#)

[Followed up on excessive vegetation, unknown construction, etc.](#)

200. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.O, 192.605\(b\)\(3\) \(192.613\(b\), 192.703\(a\), 192.703\(b\), 192.703\(c\)\)](#)  
References (also presented in: MO.GO)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered [90866 \(1914\)](#)

Result Notes [No unsatisfactory conditions found in the field but Avista addresses them as they are found during continuing surveillance](#)

201. Question Result, ID, [Sat, MO.RW.CASINGLEAKSURVEY.R](#), (also presented in: MO.RW)  
References

Question Text *Do records indicate shorted casings were leak surveyed as required?*

Assets Covered [90866 \(1914\)](#)

Result Notes [There were 7 shorted casing as of 2024 all of which were leak surveyed 2x per year NTE 7.5 months](#)

[Reviewed records for 2022-2024](#)

202. Question Result, ID, [Sat, MO.RW.LEAKFOLLOW.R](#), (also presented in: MO.RW)  
References

Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*

Assets Covered [90866 \(1914\)](#)

Result Notes [Reviewed all records of leak follow up for repairs with residual gas](#)

[All repairs were followed up within 30 days](#)

[Reviewed records for 2022-2024](#)

203. Question Result, ID, [NA, MO.RW.DOWNGRADELEAKREPAIR.R](#), (also presented in: MO.RW)  
References

Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*

Assets Covered [90866 \(1914\)](#)

Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

204. Question Result, ID, [Sat, MO.RW.LEAKREPAIRTIME.R](#), (also presented in: MO.RW)  
References

Question Text *Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?*

Assets Covered [90866 \(1914\)](#)

Result Notes [Reviewed a sample of leak orders](#)

Repairs and and follow up completed on time

652 S Mclellan St

Found 5/20/22, repaired 7/5/22

Grade 2A leak

8% Gas

Leak on abandoned portion of service

Cut off at main for repair

8% Gas

1.5 % after repair

Follow up 7/20/22

5/16/23

Grade 1

Repaired immediately

113 F St

Aldyl A Cap Broken

0% after repair

Above ground leak at high school on customer pipe

Avista red tagged meter

Grade 3

6/6/23

7/27/23

0.6% gas in manhole next to meter

7611 W US2

Ethane check with IRED

No natural gas leak found

Determined to be sewer gas

Habitual sewer gas detected in Deer Park

Found 5/24/24

Followed up on 6/7/24

Verified no natural gas

205. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.R, (also presented in: MO.RW)

Question Text *Have gas leak records been prepared and maintained as required?*

Assets Covered 90866 (1914)

Result Notes Reviewed many leak records

All records included required info

206. Question Result, ID, References Sat, MO.RW.MARKERSURVEY.R, (also presented in: MO.RW)

Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*

Assets Covered 90866 (1914)

Result Notes Completed on 5 year cycle

Five areas completed on a rotating basis

Reviewed records for 2022-2024 and verified not exceeding 63 months

207. Question Result, ID, References Sat, MO.RW.MARKERREPLACE.R, (also presented in: MO.RW)

Question Text *Do records indicate that damaged or missing markers were replaced within forty-five days of discovery?*

Assets Covered 90866 (1914)

Result Notes Markers are replaced at time they are found to be missing/damaged

Reviewed 5-year marker survey records which showed markers needing to be replaced

208. Question Result, ID, References Sat, MO.RW.MARKERSMAPSDRAW.R, (also presented in: MO.RW)

Question Text *Are records sufficient to indicate class location and other areas where pipeline markers are required?*

Assets Covered 90866 (1914)

Result Notes Reviewed maps during the inspection and it seemed clear where markers were necessary

Markers were placed at all required locations

## TD.CPMONITOR: External Corrosion - CP Monitoring

209. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c)) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*

Assets Covered 90866 (1914)

Result Notes Verified that all corrosion facilities are mapped

Checked rectifiers, test points, bonds, ACDC Decoupler, etc.

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

210. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c)) (also presented in: TD.CP, TD.CPMONITOR)

Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*

Assets Covered 90866 (1914)

Result Notes Verified that all corrosion facilities are mapped

Checked rectifiers, test points, bonds, ACDC Decoupler, etc.

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.