

# Inspection Output (IOR)

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## Report Filters

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

Results All

## Inspection Information

Inspection Name	9010_GP_Section 114_2025	Operator(s)	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted	02/03/2025
Status	LOCKED	Lead	Tom Green	Plan Approval	02/11/2025 by Dennis Ritter
Start Year	2025	Observer(s)	David Cullom, Anthony Dorrrough, Derek Norwood, Scott Anderson, Jason Hoxit	All Activity Start	02/10/2025
System Type	GT	Supervisor	Dennis Ritter	All Activity End	09/30/2025
Protocol Set ID	WA.GT.2024.02	Director	Scott Rukke	Inspection Submitted	07/14/2025
				Inspection Approval	07/17/2025 by Scott Rukke

## Inspection Summary

### Inspection Scope and Summary

This is a program inspection of Section 114 for Georgia Pacific Camas, WA GT pipeline. No field work was anticipated or completed, this inspection focused on whether records supported the procedural requirements of Section 114 Georgia Pacific. Georgia Pacific GT pipeline -10-inch- 1 mile long pipeline starting from Williams Pipeline Interconnection in the city of Washougal and ending at the GP Camas Facility.

### Facilities visited and Total AFOD

Tues. 7/8/25 at Georgia Pacific Mill in Camas, WA.

Exit review same day.

### Summary of Significant Findings

No Findings

### Primary Operator contacts and/or participants

Andi Jackson – Project/ MI Engineer – andi.jackson@gapac.com

Kellen Rosales – Compliance Program Manager – Kellen.rosales@everlineus.com

Ron Simmons – Contact (Compliance) – rsimmons001@gmail.com

Roy Rogers – P.E. Consultant Cathodic Protection Engineering INC – cpeport@comcast.net

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

Jon Busby – Mill Manager – jon.busby1@gapac.com

Steve Ringquist – Project/ MI Engineer – steveringquist@gapac.com

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1. 86255	Georgia-Pacific	unit	86255	Compressor Stations Bottle/Pipe - Holders	24	24	24	100.0%

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Report Filters: Results: all

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
				Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned					

1. Percent completion excludes unanswered questions planned as "always observe".

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	86255	--	114	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	Total Inspected	Required % Complete
1	GP section 114 inspect	--	02/10/2025 09/30/2025	--	114	86255	all types	24	24	24	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	GP section 114 inspect	COMPLETED	07/11/2025	GP section 114 inspect	--

## Results (all values, 24 results)

58 (instead of 24) results are listed due to re-presentation of questions in more than one sub-group.

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

- Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *What are your assets comprised of?*  
 Assets Covered **86255**  
 Result Notes **3.1 Pipeline Systems**

2. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*  
 Assets Covered **86255**  
 Result Notes **yes**
3. Question Result, ID, References **NA, SRN.114.DRIVERENGINE.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*  
 Assets Covered **86255**  
 Result Notes **No**
4. Question Result, ID, References **NA, SRN.114.NGUSE.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*  
 Assets Covered **86255**  
 Result Notes **No**
5. Question Result, ID, References **NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
6. Question Result, ID, References **NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
7. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
8. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
9. Question Result, ID, References **Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
10. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention last paragraph.**

11. Question Result, ID, References **Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)**  
 Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention & 7.5 Leak Detection.**
12. Question Result, ID, References **Sat, 114.114.LKMITGRPRREPAIR.P, 49 U.S.C. 60108(a)**  
 Question Text *Do procedures provide alternatives to cutouts (to reduce emissions)?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 15.1 - 15.4 General, Temporary and Permanent repairs.**
13. Question Result, ID, References **Sat, 114.114.TESTESD.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
14. Question Result, ID, References **NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
15. Question Result, ID, References **Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
16. Question Result, ID, References **Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
17. Question Result, ID, References **NA, 114.114.GNLCPSTATION.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
18. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
19. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**

20. Question Result, ID, **Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, References 114.GGBOOST)  
 Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention**
21. Question Result, ID, **Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, References 114.GGBOOST)  
 Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*  
 Assets Covered **86255**  
 Result Notes **Georgia Pacific Operations & Procedure Manual Section 15 Repairs**

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

22. Question Result, ID, **NIC, SRN.114.INSPECTCVRG.S,** (also presented in: 114.GT, 114.GGBOOST)  
 Question Text *What are your assets comprised of?*  
 Assets Covered **86255**  
 Result Notes **3.1 Pipeline Systems**
23. Question Result, ID, **NIC, SRN.114.GASTRANSPORT.S,** (also presented in: 114.GT, 114.GGBOOST)  
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*  
 Assets Covered **86255**  
 Result Notes **yes**
24. Question Result, ID, **NA, SRN.114.DRIVERENGINE.S,** (also presented in: 114.GT, 114.GGBOOST)  
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*  
 Assets Covered **86255**  
 Result Notes **No**
25. Question Result, ID, **NA, SRN.114.NGUSE.S,** (also presented in: 114.GT, 114.GGBOOST)  
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*  
 Assets Covered **86255**  
 Result Notes **No**
26. Question Result, ID, **NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
 Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
27. Question Result, ID, **NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
 Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
28. Question Result, ID, **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
 Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*  
 Assets Covered **86255**

Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention

29. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*  
Assets Covered 86255  
Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
30. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*  
Assets Covered 86255  
Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention last paragraph.
31. Question Result, ID, References NA, 114.114.LKRLSWELLHD.P, 49 U.S.C. 60108(a)  
Question Text *Do procedures provide for periodic leakage surveys around the wellhead?*  
Assets Covered 86255  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
32. Question Result, ID, References NA, 114.114.LKRLSANN.P, 49 U.S.C. 60108(a)  
Question Text *Do procedures provide for periodic checking of wellhead annuluses for indications of leaks (e.g., unexplained pressure variations)?*  
Assets Covered 86255  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
33. Question Result, ID, References NA, 114.114.LKRLSFIELD.P, 49 U.S.C. 60108(a)  
Question Text *Do procedures provide for leak surveys for well casing containment or geologic issues?*  
Assets Covered 86255  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
34. Question Result, ID, References NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
Assets Covered 86255  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
35. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
Assets Covered 86255  
Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
36. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*  
Assets Covered 86255  
Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
37. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 86255

Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention

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

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

Assets Covered 86255

Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention

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

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

Assets Covered 86255

Result Notes Georgia Pacific Operations & Procedure Manual Section 15 Repairs

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

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

Question Text *What are your assets comprised of?*

Assets Covered 86255

Result Notes 3.1 Pipeline Systems

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

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

Assets Covered 86255

Result Notes yes

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

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

Assets Covered 86255

Result Notes No

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

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

Assets Covered 86255

Result Notes No

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

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

Assets Covered 86255

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

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

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

Assets Covered 86255

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

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

- Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*  
 Assets Covered 86255  
 Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
47. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*  
 Assets Covered 86255  
 Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
48. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*  
 Assets Covered 86255  
 Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
49. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*  
 Assets Covered 86255  
 Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention last paragraph.
50. Question Result, ID, References Sat, 114.114.TESTESD.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)  
 Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*  
 Assets Covered 86255  
 Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
51. Question Result, ID, References NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
 Assets Covered 86255  
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
52. Question Result, ID, References Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)  
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*  
 Assets Covered 86255  
 Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
53. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)  
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
 Assets Covered 86255  
 Result Notes Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention
54. Question Result, ID, References NA, 114.114.GNLCPSTATION.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)  
 Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*  
 Assets Covered 86255  
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
55. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*

Assets Covered 86255

Result Notes [Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention](#)

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

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

Assets Covered 86255

Result Notes [Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention](#)

57. Question Result, ID, References [Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GT, 114.UNGS)

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

Assets Covered 86255

Result Notes [Georgia Pacific Operations & Procedure Manual Section 7.12 Emissions Prevention](#)

58. Question Result, ID, References [Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GT, 114.UNGS)

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

Assets Covered 86255

Result Notes [Georgia Pacific Operations & Procedure Manual Section 15 Repairs](#)

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