

Utilities and Transportation Commission

Standard Inspection Report for Intrastate Gas Distribution Systems

Records Review and Field Inspection

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

Inspection Report			
Inspection ID/Docket Number	2653		
Inspector Name & Submit Date	Dennis Ritter, 4/9/ 2013		
Chief Eng Name & Review/Date	Joe Subsits, 4/9/2013		
Operator Information			
Name of Operator:	Cascade Natural Gas Corp	OP ID #:	2128
Name of Unit(s):	Longview District		
Records Location:	Longview, WA		
Date(s) of Last (unit) Inspection:	12/06-12/13/2010; & 01/05/11	Inspection Date(s):	3/25-3/28/2013

Inspection Summary:

The 2013 Std Inspection for CNG Longview District was conducted in Cowlitz County at the CNG Shop and locations as noted in the inspection form. Records were reviewed at CNG's shop as well as at WUTC's office prior to field visit. Field and OQ assessments were conducted as follows: CP pipe to soil, isolation, and rectifier inspection; r/w patrols; pressure regulator and relief lock-up ; block valve operation; odorant level check; odorant pump check; odorant concentration in gas test with odorometer; shorted casing check. Additionally, an area was pointed out to CNG that might be a potential landslide area. The following issues were noted as potential areas of concern which CNG needs to address.

47) WAC 480-93-200(7)(b)(iii)(D)-CNG did not report subsection (D) on their 2011 annual report as required.

87) WAC 480-93-170(7)-Pressure tests records, at a minimum, include the required information listed under 480-93-170(a-h)-The 8/7/12, 12" V90 installation-pressure test failed to note the pressure test medium used as required.; CP 665 requires nitrogen only for valves also had Airgas receipt for N2.

118) 49 CFR 192.616(e&f) CNG identified, "Affected public-non customers" as a stakeholder audience but did not send them targeted information as required. As noted in the 2012 PA Plan effectiveness review, they failed to use targeted brochures, pamphlets etc. to inform this group. Instead, they used TV, radio etc. CNG has since revised the PA plan and is scheduled to release in April 2013.

127) 49 CFR 192.619-MAOP-The Project 6" Kalama HP from '95 has part No. PXW-650X42 listed on "Cost Analysis Sheet for Expenditure Requisition". However on all "Material Transfer Records" and "As Built" it's listed as PXW-650, without the X42. CNG has several pipe specs each with different designations for pipe strength in their Part Numbering system. If listed as PXW-650, its class B pipe, with 35,000 for yield strength. If listed as PXW-650X42, then pipe strength is 42,000. Records are not consistent and CNG is trying to rectify which strength pipe is in the ground in Kalama. CNG must confirm their MAOP with accurate documentation.

144) WAC 480-93-188(3)(b) Leak Survey Frequency- During the records review, CNG attempted to locate annual leak survey records for several High occupancy structures/areas identified prior to the inspection. These were the Woodland Intermediate School, Castle Rock Community Church and St. Mark's Episcopal church (both in Castle Rock). CNG could not locate annual records. They were in fact surveying on a 3 year basis. This might be indicative of a larger CNG issue. When they changed from a paper based work order system to a new computer based system in 2010, some of the public building inspections (PBIs) CNG checked annually, did not make it into the new system. CNG attempted to go back and rectify this by hand, but by their own admission, some were missed. Exactly how many is unknown.

147) WAC 480-93-188 Gas Leak Surveys CNG identified an area which they believed may be unstable near the 12" HP feed to Longview Fibre north of Carrols road on the east side of I-5. This area is in a known historic landslide area. CNG after a heavy rain will do a special leak survey.

The following item is a placeholder, to ensure CNG does the follow up testing on the shorted casings and sends the results to WUTC.

187) Electrical Isolation (**Including Casings**) Several casings were found with elevated P/S reads during the 2012 annual survey. CNG performed follow up testing on all of them and 5 of these casings failed the Tinker-Razor test. They were leak tested per CNG procedure and found to be OK. They were added to a semi-annual leak survey schedule. Same casings were identified in previous casing survey (2011) but did not fail Tinker. These same 5 will be reevaluated in annual 2013 survey and if still fail, CNG will investigate by digging up casing. WUTC will be notified after 2013 survey

220) 192.805 Qualification Program During the field portion of the inspection, an operator was uncomfortable performing a covered task that he was qualified to perform

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Inspection Summary:

HQ Address: Cascade Natural Gas Corp. 8113 W. Grandridge Blvd. Kennewick, WA 99336	System/Unit Name & Address: Cascade Natural Gas Corp Longview Districe 1332 Vandercook Way Longview, WA 98632-3902	
Co. Official: Eric Martucelli Phone No.: (509) 572-0294 Fax No.: (509) 737-9803 Emergency Phone No.: 1-888-522-1130	Phone No.: (360)423-1598 Fax No.: (360)425-4921 Emergency Phone No.: 1-888-522-1130	
Persons Interviewed	Title	Phone No.
Tom Wilson	District Manager	(360) 600-1922
Tina Beach	Manager, Standards & Compliance	(509) 734-4576
Patti Chartrey	Pipeline Safety Specialist	(360) 405-4231
Vicki Ganow	Pipeline Safety Specialist	(360) 788-2381
Morgan Gray	Corrosion Technician	(360) 981-2504

WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection. (check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.) Lex Vinsel	Date:	10/16/2012

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S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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GAS SYSTEM OPERATIONS			
Gas Supplier	Williams		
Services: Residential 2601 Commercial 1160 Industrial 43 Other			
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	34
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	2011-2; 2012-4
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	0	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)	212.46
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Williams-Longview Kelso Castle Rock Kalama Woodland	480 235 145 290 140	460 225 145
Town:	Longview Kelso Castle Rock Kalama Woodland	36 46 40 22 52	32 38 36
Other:			
Does the operator have any transmission pipelines?	No		
Compressor stations? Use Attachment 1.	None		

Pipe Specifications:			
Year Installed (Range)	1960-Present	Pipe Diameters (Range)	1/2" to 12"
Material Type	Steel and PE	Line Pipe Specification Used	API 5L X42, X46, X52, ASTM 2513- 3408, 2406 PE
Mileage	282.6	SMYS %	All < 20%

Operator Qualification Field Validation
Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 4, May 2007) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq Date Completed/Uploaded 4/12/13

Integrity Management Field Validation
Important: Per PHMSA, IMP Field Verification Form (Rev 6/18/2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at http://primis.phmsa.dot.gov/gasimp/home.gim Date Completed/Uploaded: N/A-not a transmission inspection

PART 199 Drug and Alcohol Testing Regulations and Procedures		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

REPORTING RECORDS	S	U	N/A	N/C

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REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates. No Transmission or LNG			X	
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? 3/08/13	X			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802 , or electronically at http://www.nrc.uscg.mil/nrchp.html , and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident.	X			
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov at unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	X			
5.	191.15(a)	30-day follow-up written reports to PHMSA (Form F7100.2) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov No 30-d follow reports			X	
6.	191.15(c)	Supplemental report (to 30-day follow-up) No Supplemental reports			X	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2011 for the year 2010). Completed but had trouble logging into PHMSA website. Jamerson worked with CNG?	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov April 5, 2012 validated	X			
9.	191.23	Filing the Safety Related Condition Report (SRCR) No SRCR reports filed			X	
10.	191.25 49 U.S.C. 60139, Subsection (b)(2)	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery. No SRCR reports filed Note: Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA on or before the fifth day following the date on which the exceedance occurs. The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <ul style="list-style-type: none"> • The name and principal address of the operator date of the report, name, job title, and business telephone number of the person submitting the report. • The name, job title, and business telephone number of the person who determined the condition exists. • The date the condition was discovered and the date the condition was first determined to exist. • The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored. • The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action. 			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections No offshore pipelines			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports No abandoned facilities			X	
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				

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REPORTING RECORDS			S	U	N/A	N/C
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; No fatalities(or injuries)			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; No damage meeting threshold			X	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; No evacuations			X	
18.	480-93-200(1)(d)	The unintentional ignition of gas; No unintentional ignitions			X	
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; No unscheduled interruptions			X	
20.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; No MAOP exceedance			X	
21.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; Woodland odor complaints from Jan 2011.	X			
22.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for; NO TELEPHONIC REPORTABLES				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			X	
24.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service;			X	
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP			X	
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;			X	
29.	480-93-200(4)(b)	The extent of injuries and damage;			X	
30.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;			X	
31.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;			X	
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;			X	
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;			X	
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;			X	
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;			X	
37.	480-93-200(4)(j)	Line type;			X	
38.	480-93-200(4)(k)	City and county of incident; and			X	
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.			X	
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted			X	
41.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure			X	
42.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
43.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
44.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
45.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; 2011-41953; 2012-41958-	X			
46.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and 2011-161; 2012-157 (companywide)	X			

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REPORTING RECORDS			S	U	N/A	N/C
47.		Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other. CNG did not have (D) on their 2011 annual report but have data. CNG will resubmit their 2011 report with the correct information per the rule.	X			
48.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.	X			
49.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
50.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
51.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
52.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator	X			
53.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
54.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate?	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
55.	480-93-013	OQ records for personnel performing New Construction covered tasks	X			
56.	192.225	Test Results to Qualify Welding Procedures No new welding procedures qualified			X	
57.	192.227	Welder Qualification welders qualified quarterly; checked both 12" Lonview Relocate and 12" V90 replacement.	X			
58.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) No Appx C welders			X	
59.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months) Terry Butler, Snelson	X			
60.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period No requalified joiners			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
61.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)	X			
62.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992	X			
63.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains No transmission			X	
64.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
65.	192.241(a)	Visual Weld Inspector Training/Experience	X			
66.	192.243(b)(2)	Nondestructive Technician Qualification Northwest Inspection	X			
67.	192.243(c)	NDT procedures	X			
68.	192.243(f)	Total Number of Girth Welds	X			
69.	192.243(f)	Number of Welds Inspected by NDT	X			
70.	192.243(f)	Number of Welds Rejected	X			
71.	192.243(f)	Disposition of each Weld Rejected	X			
72.	.273/.283	Qualified Joining Procedures Including Test Results looked at CP 607 and PPI's butt fusion weld test results which CNG uses for their joining procedure.	X			
73.	192.303	Construction Specifications	X			
74.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
75.	192.327	Amount, location, cover of each size of pipe installed	X			
76.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length No Transmission			X	
77.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: No Transmission			X	
78.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; No Transmission			X	
79.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. No Transmission			X	
80.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed No Transmission			X	
81.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; No Transmission			X	
82.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. No Transmission			X	
83.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment;			X	
84.	480-93-160(2)(g)	Welding specifications; and No Transmission			X	
85.	480-93-160(2)(h)	Bending procedures to be followed if needed. No Transmission			X	
86.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ 20% SMYS? No pressure test on lines >- 20% MAOP			X	
87.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) 12" V90 installation-failed to note medium used in test. 8-7-12; CP 665 requires nitrogen only for valves.	X			
88.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed?	X			
89.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule)	X			
90.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig No lines moved or lowered per this regulation			X	
91.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig No lines moved or lowered per this regulation			X	

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
92.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline-checked Mt. Brynion HP 12” from ‘74 replacement and 1957 from Pacific Gas (prior to CNG).	X			
93.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years Looked at plats E0077667 & E0083745 OK and service to 9 Gibbs Ln , Longview	X			
94.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09	X			
95.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	X			
96.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity?	X			
97.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures Construction Inspection Checklist-monthly spot checks of crews.	X			
98.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures No transmission No transmission			X	
99.	192.609	Class Location Study (If applicable) No transmission			X	
100.	192.611	Confirmation or revision of MAOP No transmission			X	
101.	192.614	Damage Prevention (Operator Internal Performance Measures)				
102.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) Have OQ program but no field audit.	X			
103.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? No locating service contracts			X	
104.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? ? No locating service contracts			X	
105.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? Annual MEA module review, Yakima 8/2012	X			
106.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
107.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Examined 6 random tickets, 3 different employees	X			
108.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements?	X			
109.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys?	X			
110.		480-93-250 RCW 19.122.053	Has the operator subscribed to the UTC Virtual Damage Information Reporting Tool (DIRT)? Mandatory reporting required effective 1/1/2013. Operator may register at https://identity.damagereporting.org/cgareg/control/login.do			Y/N

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111.		Emergency Response Plans	S	U	N/A	N/C																										
112.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response Leak response. Checked all Grade 1 and 2 leaks	X																													
113.	192.615(b)(1)	Location Specific Emergency Plan	X																													
114.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training	X																													
115.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Safety meeting agenda item.	X																													
116.	192.615(c)	Liaison Program with Public Officials	X																													
117.	192.616	Public Awareness Program																														
118.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below: Affected public-non customers as identified in PA plan not identified specifically. Used TV, radio etc. Patti J. identified this as part of PA effectiveness evaluation in 2012.	X																													
119.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.																														
120.		API RP 1162 Baseline* Recommended Message Deliveries																														
121.		<table border="1"> <thead> <tr> <th align="center">Stakeholder Audience (LDC's)</th> <th align="center">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residence Along Local Distribution System</td> <td>Annual</td> </tr> <tr> <td>LDC Customers</td> <td>Twice annually</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> <tr> <th align="center">Stakeholder Audience (Transmission line operators)</th> <th align="center">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> <tr> <td>Residence Along Local Distribution System</td> <td>2 years</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> </tbody> </table>	Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	Annual	LDC Customers	Twice annually	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual	Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	2 years	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual				
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122.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																														
123.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. Language criteria will be refined in updated plan.	X																													

Utilities and Transportation Commission
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124.	.616(h)	IAW API RP 1162, the operator’s program should be reviewed for effectiveness within four years of the date the operator’s program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 . .616(h)	X			
125.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: No master meters (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information.			X	
126.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10)	X			

Comments:
118) Public Awareness Program 2011 and 2012 CNG polled field crews to validate prevalent language after reviewing census data from 2011 and 2012. In 2012 reassessed program using contractor. Also had PA inspection by WUTC in 2012. Based on findings from 2012 PA Effectiveness Evaluation, CNG is revising PA program. New program will be rolled out by end of April, 2013.

127.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08) see note below		X		
128.	480-93-015(1)	Odorization of Gas – Concentrations adequate	X			
129.	480-93-015(2)	Monthly Odorant Sniff Testing	X			
130.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements	X			
131.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
132.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) 2011- Part of Docket PG-110443, not reviewed. 2012 reviewed with this inspection.	X			
133.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?) 2011- Part of Docket PG-110443, not reviewed. 2012 reviewed with this inspection.	X			
134.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on	X			
135.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? No uprating			X	
136.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	X			
137.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company’s own facilities, and; No leaks from foreign source			X	
138.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? ; No leaks from foreign source			X	
139.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair?	X			
140.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	X			
141.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X			
142.	480-93-188(1)	Gas leak surveys	X			
143.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X			

Utilities and Transportation Commission
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144.	480-93-188(3)	Leak survey frequency (Refer to Table Below) see note below		X														
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Business Districts (implement by 6/02/07)</td> <td style="width: 50%;">1/yr (15 months)</td> </tr> <tr> <td>High Occupancy Structures</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Pipelines Operating ≥ 250 psig</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Other Mains: CI, WI, copper, unprotected steel</td> <td>2/yr (7.5 months)</td> </tr> </table>							Business Districts (implement by 6/02/07)	1/yr (15 months)	High Occupancy Structures	1/yr (15 months)	Pipelines Operating ≥ 250 psig	1/yr (15 months)	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)				
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145.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs	X															
146.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred	X															
147.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected see note below	X															
148.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions Kelso south HP line after heavy rain east of Carrols Rd.	X															
149.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in	X															
150.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f) this district is on a 3 year cycle as they do atmospheric corrosion with leak survey .	X															
151.	480-93-188(6)	Leak program - Self Audits	X															
152.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705No Transmission			X													
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Class Location</th> <th style="width: 33%;">At Highway and Railroad Crossings</th> <th style="width: 33%;">At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
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153.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 No Transmission			X													
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154.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1)	X															
155.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) patrol included in quarterly patrol.	X															
156.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) completed every 3 years as part of atmospheric corrosion survey.	X															
157.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> • Outside Business District (5 years) every 3 years as part of atmospheric • Cathodically unprotected distribution lines (3 years) 	X															
158.	192.603(b)	Tests for Reinstating Service Lines 192.725No reinstated service lines			X													
159.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 No abandoned pipelines			X													
160.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X															
161.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X															
162.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745No transmission			X													
163.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	X															
164.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X															

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165.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749No vaults meeting threshold			X	
166.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751 no hot work permits--use lockout/tagout and safety meetings.			X	
167.	192. 603(b)	Welding – Procedure 192.225(b)	X			
168.	192. 603(b)	Welding – Welder Qualification 192.227/.229	X			
169.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2)	X			
170.	192.709	NDT Records (pipeline life) .243(f) No transmission			X	
171.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) No transmission			X	
172.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) No transmission			X	

Comments:

127) Project 6” Kalama HP from ’95 has part No. PXW-650X42 listed on “Cost Analysis Sheet for Expenditure Requisition”. However on all “material Transfer Records” and “As Built” it’s listed as PXW-650, without the X42. CNG has several pipe specs each with different designations for pipe strength in their Part Numbering system. If listed as PXW-650, its class B pipe, with 35,000 for yield strength. If listed as PXW-650X42, then pipe strength is 42,000. Records are not consistent and CNG is trying to rectify which strength pipe is in the ground in Kalama.

144) Attempted to locate annual leak survey records for Woodland Intermediate School and Castle Rock Community Church and St. Mark’s Episcopal church as meets definition of public building. CNG could not locate annual records. They were in fact surveying on a 3 year basis. This might be indicative of a larger CNG issue of when they changed from a paper based work order system to a new computer based system in 2010. Some of the public building inspections (PBIs) did not make it into the new system. CNG attempted to go back and rectify this by hand, but by their own admission, some were missed.

147) CNG identified an area which they believed may be unstable near the 12” HP feed to Longview Fibre north of Carrols road on the east side of I-5. This area is in a known historic landslide area. CNG after a heavy rain will do a special leak survey.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
173.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
174.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) checked 12 HP replacement on Industrial Way	X			
175.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) No short sections in this district			X	
176.	192.491	Test Lead Maintenance .471	X			
177.	192.491	Maps or Records .491(a) 12” HP replacement on industrial way	X			
178.	192.491	Examination of Buried Pipe when exposed .459	X			
179.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
180.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X			
181.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	X			
182.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) none			X	
183.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) none			X	
184.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) Ross Simmons Hardwood—followed process to clear	X			
185.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation.	X			
186.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) No unprotected pipelines			X	
187.	192.491	Electrical Isolation (Including Casings) .467	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
188.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
189.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods None			X	
190.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days See note below	X			
191.	480-93-110(5)(c)	Casing shorts cleared when practical None cleared since last inspection.			X	
192.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months	X			
193.	192.491	Interference Currents .473 No interference currents			X	
194.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) No internal corrosion/corrosive gas			X	
195.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	X			
196.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 No internal corrosion/corrosive gas			X	
197.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481	X			
198.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	X			

Comments:

187) 5 casings failed the Tinker Razor test in 2012. They were leak tested per CP and found to be OK and put on semi-annual leak survey schedule. Same casings were identified in previous casing survey (2011) but did not fail Tinker. These same 5 will be reevaluated in annual 2013 survey and if still fail, CNG will investigate by digging up casing. WUTC will be notified after 2013 survey.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
199.	192.161	Supports and anchors	X			
200.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? No welding observed			X	
201.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables No welding observed			X	
202.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? No welding observed			X	
203.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. No welding observed			X	
204.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified? No new construction observed			X	
205.	480-93-015(1)	Odorization	X			
206.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
207.	192.179	Valve Protection from Tampering or Damage	X			
208.	192.455	Pipeline coatings meet requirements of 192.461 (<i>for buried pipelines installed after 7/31/71</i>)	X			
209.	192.463	Levels of cathodic protection	X			
210.	192.465	Rectifiers	X			
211.	192.467	CP - Electrical Isolation	X			
212.	192.476	Systems designed to reduce internal corrosion No systems for internal corrosion			X	
213.	192.479	Pipeline Components exposed to the atmosphere	X			
214.	192.481	Atmospheric Corrosion: monitoring	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
215.	192.491	Test Stations – Sufficient Number .469	X			
216.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
217.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed? No construction observed			X	
218.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? No construction observed			X	
219.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
220.	192.605	Knowledge of Operating Personnel See OQ Form 15		X		
221.	480-93-124	Pipeline markers	X			
222.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
223.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) No pretested pipe			X	
224.	192.195	Overpressure protection designed and installed where required?	X			
225.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			
226.	192.741	Telemetry, Recording Gauges	X			
227.	192.751	Warning Signs	X			
228.	192.355	Customer meters and regulators. Protection from damage	X			
229.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. None observed during inspection			X	
230.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
231.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) minimal stock on hand-no construction	X			
232.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards. No open trenches during construction			X	
233.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
234.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No X				
235.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?			X	
236.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?			X	
237.	192.745	Valve Maintenance (Transmission) No transmission			X	
238.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
Gate Station	12" Longview-Kelso HP Distribution	2503 Mt. Brynion Rd, Kelso WA
Gate Station		425 Powell Rd, Castle Rock, WA
Gate Station		Hendrickson Rd. Kalama, WA
Rectifier	GB-01	Castle Rock, WA
Rectifier	GB-02	Hendrickson Rd. Kalama, WA
Shorted Casing	Columbia & Cowlitz Railway	Fishers Ln at Columbia Heights Longview, WA

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
Odorant sniff test point	Meter at CNG shop	Longview, WA				
Potential Landslide area		Mt. Brynion Rd at Williams Finney Rd, Kelso WA				
Regulator Station	R-40	Rotary Park, Longview				
Regulator Station	R-17					

Comments:

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

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-10-07	August 31, 2010	Liquefied Natural Gas Facilities: Obtaining Approval of Alternative Vapor-Gas Dispersion Models
ADB-10-08	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

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

No Compressor in the District

Attachment 1

Distribution Operator Compressor Station Inspection

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239.		.605(b)		COMPRESSOR STATION PROCEDURES				S	U	N/A	N/C
240.		.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service								
241.		.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units								
242.		.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement								
243.		.735	(a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings								
244.			(b) Tank must be protected according to NFPA #30								
245.		.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:								
246.			<ul style="list-style-type: none"> 50% of the upright side areas are permanently open, or 								
247.			<ul style="list-style-type: none"> It is an unattended field compressor station of 1000 hp or less 								

Comments:

COMPRESSOR STATION O&M PERFORMANCE AND RECORDS				S	U	N/A	N/C
248.	.709	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)				
249.		.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)				
250.		.736(c)	Compressor Stations – Detection and Alarms (Performance Test)				

Comments:

COMPRESSOR STATIONS INSPECTION (Field)				S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)							
251.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits				
252.			Door latch must open from inside without a key				
253.			Doors must swing outward				
254.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit				
255.			Each gate located within 200 ft of any compressor plant building must open outward				
256.			When occupied, the door must be opened from the inside without a key				
257.		(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?				

No Compressor in the District

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)				S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)							
258.	.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?				
259.		(b)	Do the liquid separators have a manual means of removing liquids?				
260.			If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?				
261.	.167	(a)	ESD system must:				
262.			- Discharge blowdown gas to a safe location				
263.			- Block and blow down the gas in the station				
264.			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers				
265.			- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage				
266.			ESD system must be operable from at least two locations, each of which is:				
267.	.167		- Outside the gas area of the station				
268.			- Not more than 500 feet from the limits of the station				
269.			- ESD switches near emergency exits?				
270.		(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?				
271.		(c)	Are ESDs on platforms designed to actuate automatically by...				
272.			- For unattended compressor stations, when:				
273.			▪ The gas pressure equals MAOP plus 15%?				
274.			▪ An uncontrolled fire occurs on the platform?				
275.			- For compressor station in a building, when				
276.			▪ An uncontrolled fire occurs in the building?				
277.			▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?				
278.	.171	(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.				
279.		(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?				
280.		(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?				
281.		(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?				
282.		(e)	Are the mufflers equipped with vents to vent any trapped gas?				
283.	.173		Is each compressor station building adequately ventilated?				
284.	.457		Is all buried piping cathodically protected?				
285.	.481		Atmospheric corrosion of aboveground facilities				
286.	.603		Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?				
287.			Are facility maps current/up-to-date?				
288.	.615		Emergency Plan for the station on site?				
289.	.619		Review pressure recording charts and/or SCADA				

No Compressor in the District

Attachment 1

Distribution Operator Compressor Station Inspection

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If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
290.	.707	Markers				
291.	.731	Overpressure protection – relief’s or shutdowns				
292.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?				
293.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?				
294.	.736	Gas detection – location				

Comments:
