

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

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.

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	5831		
Inspector Name & Submit Date	Scott Rukke and Anthony Dorrough/7/11/2014		
Chief Eng Name & Review/Date	Joe Subsits, 7/17/2014		
Operator Information			
Name of Operator:	Avista Utilities	OP ID #:	31232
Name of Unit(s):	Ritzville, Goldendale, Stevenson		
Records Location:	Spokane, WA		
Date(s) of Last (unit) Inspection:	This is a new unit that had new boundaries implemented this year.	Inspection Date(s):	June 2 – 11, 2014

<p>Inspection Summary:</p> <p>Ritzville, Goldendale and Stevenson distribution systems. A records review was conducted in Avista’s Spokane Dollar Rd office during week one. Week two was comprised of a few remaining records to be reviewed and field visits to multiple small distribution systems starting in Stevenson WA and working towards Ritzville WA.</p> <p>Emphasis was placed on the smaller towns and cities that have their own isolated distribution systems served by HP supply lines off Gate Stations on the Williams pipeline. Most had two district regulators serving the individual communities and we checked each one for lockup and set pressures.</p> <p>Avista is transitioning from paper records to electronic records for much of their maintenance records. This made the inspection process much slower due to the necessity of having to drill down on individual information on each record. The leak records were very detailed but more difficult to review due to the record keeping system.</p> <p>No apparent violations were noted during this inspection. One area of concern was noted that was related to how Avista has interpreted WAC 480-93-188 and the requirement to annually leak survey High Occupancy Structures. Unless there is a service present, Avista does not leak survey the mains. The rule needs to be rewritten to clarify the intent. It was suggested to Avista that they begin surveying the mains until the rule is redrafted.</p>
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<p>HQ Address: 1411 East Mission PO Box 3727 Spokane, WA 99220-3727</p>	<p>System/Unit Name & Address: Ritzville, Goldendale, Stevenson</p>	
<p>Co. Official: Don Kopczynski, VP Energy delivery Phone No.: 509-495-4877 Fax No.: Emergency Phone No.:</p>	<p>Phone No.: Fax No.: Emergency Phone No.:</p>	
Persons Interviewed	Title	Phone No.
Randy Bareither	Pipeline Safety Engineer	509-495-8716
Brandon Beierle	Pipeline Svc’s Program Administrator	509-495-8501
Jodie Lamb	Pipeline Integrity and Compliance	509-495-2660
Pam Bennett	Compliance Tech	509-495-2050
Gary Douglas	CP Foreman	509-550-9134

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Bob Larson	CP Tech	509-981-4748
Rich Inouye	Pressure Controlman	509-495-4057
Rich Funge	Gas Local Rep Ritzville	509-995-9299
Mark Rowland	Gas Local Rep Goldendale	509-439-2191
Tim Mair	Construction Manager	509-495-8946
Jody Morehouse	Manager Pipeline Integrity and Compliance	509-495-2760

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 checked="" type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	4/10/2012
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	4/10/2012
<input checked="" type="checkbox"/>	OQ Program Review (PHMSA Form 14)	Date:	Scheduled for June 24 th .

GAS SYSTEM OPERATIONS			
Gas Supplier	Williams Pipeline		
Services:	<i>Residential 21,056 Commercial 499 Industrial 5 Other 2</i>		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	Two grade 3 leaks in Goldendale
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	For 2013 – 225 damages
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)	Total miles is 171 miles, approximately 21 in Class 3 and 4
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Multiple feeder lines	N/A	N/A
Town:	Ritzville, Goldendale, Stevenson,	250	<250
Other:			
Does the operator have any transmission pipelines?	No		
Compressor stations? Use Attachment 1.	No		

Pipe Specifications:			
Year Installed (Range)	1956 to present	Pipe Diameters (Range)	½” to 6”
Material Type	Poly, carbon steel,	Line Pipe Specification Used	API 5L, PE 2406
Mileage	3,325.25 miles	SMYS %	10.5%

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 July 11, 2014	

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Integrity Management Field Validation

No transmission.

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: No transmission**

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
1.	<p>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.</p> <p><i>(b) Updates.—A person providing information under subsection (a) shall provide to the Secretary updates of the information to reflect changes in the pipeline facility owned or operated by the person and as otherwise required by the Secretary.</i></p> <p>No transmission or LNG.</p>			X	
2.	<p>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?</p> <p>RCW 81.88.080 Pipeline mapping system — Commission specifications and evaluations.</p> <p><i>(1) The commission shall require hazardous liquid pipeline companies, and gas pipeline companies with interstate pipelines, or gas pipelines operating over two hundred fifty pounds per square inch gauge, to provide accurate maps of these pipelines to specifications developed by the commission sufficient to meet the needs of first responders.</i></p> <p><i>(2) The commission shall evaluate the sufficiency of the maps and consolidate the maps into a statewide geographic information system. The commission shall assist local governments in obtaining hazardous liquid and gas pipeline location information and maps. The maps shall be made available to the one-number locator services as provided in chapter 19.122 RCW. The mapping system shall be consistent with the United States department of transportation national pipeline mapping program.</i></p> <p><i>(3) The commission shall periodically update the mapping system.</i></p> <p>March 31, 2010</p>	X			
3.	<p>191.5</p> <p>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.</p> <p>Bridgeport dig in residential service. Service not marked resulting in fine to excavator and home. >50k April 12, 2013 NRC 20130050-15833</p>	X			

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REPORTING RECORDS			S	U	N/A	N/C
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline 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	X			
6.	191.15(c)	Supplemental report (to 30-day follow-up) Submitted on 3/26/2014	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).	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline April 17, 2012	X			
9.	191.23	Filing the Safety Related Condition Report (SRCR)			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. 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			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports No abandoned facilities in these locations.			X	
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None since last inspection.			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars;	X			
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas;	X			
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	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;	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;	X			
22.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				

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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)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form)				
43.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) Procedure 4.14	X			
44.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed?	X			
45.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? Note: Records maintained for two years and made available to the commission upon request. Avista claims has these records.	X			
46.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
47.	480-93-200(8)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 	X			
48.	480-93-200(8)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 	X			
49.	480-93-200(8)(c)	<ul style="list-style-type: none"> Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. 	X			

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50.	480-93-200(9)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a) • A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) None since last inspection.			X	
51.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
52.	480-93-200(10)(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			
53.	480-93-200(10)(b)	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			
54.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities Updated 2/22/2013	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
56.	480-93-200(13)	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
57.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator	X			
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
59.	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? Standard 3.16 sheets 1 and 2, excess flow valve standard is not clear whether an EFV needs to be installed on test and tie services where a new main is installed. Excess flow valves are being installed on test and ties but the procedure needs to be revised to be more specific.	X			

Comments:

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CONSTRUCTION RECORDS			S	U	N/A	N/C
60.	480-93-013	OQ records for personnel performing New Construction covered tasks	X			
61.	192.225	Test Results to Qualify Welding Procedures	X			
62.	192.227	Welder Qualification Rich Schumann – Contractor for the Ritzville, Lind, Odessa	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) No appendix C welders.			X	
64.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	X			
65.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	X			
66.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) Joint tracking procedure – Form 2596, procedure 3.23. Spot check employees of Don Williams Const. good	X			
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 None in district			X	
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains	X			
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
70.	192.241(a)	Visual Weld Inspector Training/Experience	X			
71.	192.243(b)(2)	Nondestructive Technician Qualification None constructed in district since last insp.			X	
72.	192.243(c)	NDT procedures None constructed in district since last insp.			X	
73.	192.243(f)	Total Number of Girth Welds None constructed in district since last insp.			X	
74.	192.243(f)	Number of Welds Inspected by NDT None constructed in district since last insp.			X	
75.	192.243(f)	Number of Welds Rejected None constructed in district since last insp.			X	
76.	192.243(f)	Disposition of each Weld Rejected None constructed in district since last insp.			X	
77.	.273/.283	Qualified Joining Procedures Including Test Results				X
78.	192.303	Construction Specifications None constructed in district since last insp.			X	
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
80.	192.327	Amount, location, cover of each size of pipe installed	X			
81.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length No transmission			X	
82.	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	
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; No transmission			X	
84.	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	

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85.	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	
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; No transmission			X	
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. No transmission			X	
88.	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; No transmission			X	
89.	480-93-160(2)(g)	Welding specifications; and No transmission			X	
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. No transmission			X	
91.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS?			X	
92.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h)	X			
93.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed?	X			
94.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule)	X			
95.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig None in unit since last inspection.			X	
96.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines \leq 60 psig None in unit since last inspection.			X	

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
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97.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline Need to get the test chart for Goldendale HP. The test on the as-built only went to 106 psig. Reviewed the test chart for the Goldendale HP. The test was at 250 psig for approximately 8hrs. Their standards require 8 hrs. A 100 psig test was initiated prior to the full pressure test.	X			
98.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	X			
99.	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			
100.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	X			
101.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity?	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures The manager reviews employee work on a daily basis for any issues.	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures Manager reviews trouble orders and effectiveness of procedures and issues.	X			
104.	192.609	Class Location Study (If applicable) Nothing over 40%.			X	
105.	192.611	Nothing over 40%.			X	
106.		Damage Prevention (Operator Internal Performance Measures)				
107.		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) Damage prevention program is in section 4.13. Does not detail specifics. Does not follow CGA best practices.				X
108.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? See above			X	
109.	192.614	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? See above			X	
110.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? See above			X	
111.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. See above			X	
112.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Reviewed a sample of locates.	X			
113.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? Qualified through VeriForce and the database is maintained through VeriSource.	X			

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114.		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? Procedure 4.13, sheet 5 “on-site inspections general” 2. In the case of blasting, does the inspection include leakage surveys? 4.13	X			

Comments:

Avista does not follow the CGA best practices.

115.		Emergency Response Plans	S	U	N/A	N/C
116.	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 There were some long response times to the outlying areas of Ritzville, Goldendale and Stevenson. Overall the responses are better than past times.	X			
117.	192.615(b)(1)	Location Specific Emergency Plan Reviewed site specific emergency plan for Ritzville unit.	X			
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training OQ tasks encompass emergency response ER-leak investigation 221.020.035 Apprenticeship program also encompasses portions of the emergency response training.	X			
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	X			
120.	192.615(c)	Liaison Program with Public Officials	X			
121.	192.616	Public Awareness Program				
122.	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: A public awareness audit was conducted by Patti Johnson on March 25, 2014.				X
123.		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.				
124.		API RP 1162 Baseline* Recommended Message Deliveries				

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125.		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						
		126.						* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.	
127.	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. A public awareness audit was conducted by Patti Johnson on March 25, 2014.							X
128.	.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) A public awareness audit was conducted by Patti Johnson on March 25, 2014.							X
129.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (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. A public awareness audit was conducted by Patti Johnson on March 25, 2014.							X
130.	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) A public awareness audit was conducted by Patti Johnson on March 25, 2014.							X

Comments:
A public awareness audit was conducted by Patti Johnson on March 25, 2014.

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131.	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) Not used by Avista			X	
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate Reviewed 2011, 2012 and 2013	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing Reviewed 2011, 2012 and 2013	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements Reviewed 2011, 2012 and 2013. Some follow up reads where concentrations were over Avista's threshold of .40% were missed in 2011 and 2012 due unclear procedures. Procedures were revised in 2013 and no low concentration follow-ups were missed.	X			
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
136.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) Reviewed 2011, 2012 and 2013. Four Ritzville and one in Stevenson.	X			
137.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? None noted on records.			X	
138.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on	X			
139.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? No updates greater than 60 psig.			X	
140.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	X			
141.	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; None in district.			X	
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? None in district.			X	
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair?	X			
144.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	X			
145.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X			
146.	480-93-188(1)	Gas leak surveys	X			
147.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) Reviewed 2012 and 2013 for Ritzville, Goldendale and Stevenson.	X			
148.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

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	Business Districts (implement by 6/02/07)	1/yr (15 months)															
	High Occupancy Structures	1/yr (15 months)															
	Pipelines Operating \geq 250 psig Sprague 5/22/2012 Tokio 5/29/2012 Lind 5/24/2012	1/yr (15 months)															
	Other Mains: CI, WI, copper, unprotected steel None of these facilities.	2/yr (7.5 months)															
149.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs	X														
150.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred	X														
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected None noted.			X												
152.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions	X														
153.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings.	X														
154.	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)	X														
155.	480-93-188(6)	Leak program - Self Audits Procedure 5.11 self audits. Reviewed 2012 and 2013 self audits conducted	X														
156.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 No transmission in this unit.			X												
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>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)
Class Location	At Highway and Railroad Crossings	At All Other Places															
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3	4/yr (4½ months)	2/yr (7½ months)															
4	4/yr (4½ months)	4/yr (4½ months)															
157.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 No transmission in this unit.			X												
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>						Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed															
1 and 2	1/yr	15 months															
3	2/yr	7½ months															
4	4/yr	4½ months															
158.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1)	X														
159.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	X														
160.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1)	X														
161.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> Outside Business District (5 years) Cathodically unprotected distribution lines (3 years) 	X														
162.	192.603(b)	Tests for Reinstating Service Lines 192.725	X														
163.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 None in unit			X												
164.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X														

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165.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X			
166.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 No transmission in this unit.			X	
167.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	X			
168.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X			
169.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 None in unit.			X	
170.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751 In procedure. No jobs requiring a hot work permit.				X
171.	192. 603(b)	Welding – Procedure 192.225(b) Reviewed during a special audit.				X
172.	192. 603(b)	Welding – Welder Qualification 192.227/.229 Reviewed welder qualifications for personnel that work in the district. Very few welders in this area.	X			
173.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) No NDT jobs in this area since last inspection.			X	
174.	192.709	NDT Records (pipeline life) .243(f) No NDT jobs in this area since last inspection.			X	
175.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) No transmission.			X	
176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) No transmission.			X	

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
177.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) <i>2.32 sheet 5</i>	X			
178.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) Goldendale HP job CP immediately upon completion. No other steel jobs in district.	X			
179.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	X			
180.	192.491	Test Lead Maintenance .471 Procedure requires 2 leads for each installation.	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
181.	192.491	Maps or Records .491(a)	X			
182.	192.491	Examination of Buried Pipe when exposed .459 Reviewed Ritzville job at Division and Smitty Blvd.	X			
183.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed Reviewed Ritzville job at Division and Smitty Blvd.	X			
184.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) Reviewed 2011, 2012 and 2013	X			
185.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Reviewed 2011, 2012 and 2013	X			
186.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) Reviewed records from 2011, 2012 and 2013. There are 4 critical bonds.	X			
187.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) No non critical bonds			X	
188.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
189.	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			
190.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) No unprotected pipelines.			X	
191.	192.491	Electrical Isolation (Including Casings) .467	X			
192.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months One casing in Goldendale was removed in 2013 Ritzville – Reviewed 2011, 2012 and 2013	X			
193.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods None in unit.			X	
194.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days No shorts since last inspection.			X	
195.	480-93-110(5)(c)	Casing shorts cleared when practical None in unit.			X	
196.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months No shorts since last inspection.			X	
197.	192.491	Interference Currents .473	X			
198.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) Contract with Williams states gas will not be corrosive. Williams tests the gas with a chromatograph.			X	
199.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) Reviewed internal inspection report for the HP replacement at Hwy 97 and Simcoe in Goldendale.	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
200.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 Reviewed internal inspection report for the HP replacement at Hwy 97 and Simcoe in Goldendale.	X			
201.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Washington State was done in 2009 and 2012. Procedure 5.14. All corrosion and buried has a 90 day remediation. Reviewed exception records and all were good. Good tracking system and records.	X			
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 No corrosion requiring replacement.			X	

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
203.	192.161	Supports and anchors	X			
204.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? Not on site of any welding.			X	
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables Not on site of any welding.			X	
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? Not on site of any fusion.			X	
207.	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. Not on site of any welding.			X	
208.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified? This is a WAC requirement and company policy. We did not view any new const.			X	
209.	480-93-015(1)	Odorization	X			
210.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
211.	192.179	Valve Protection from Tampering or Damage	X			
212.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
213.	192.463	Levels of cathodic protection	X			
214.	192.465	Rectifiers	X			
215.	192.467	CP - Electrical Isolation	X			
216.	192.476	Systems designed to reduce internal corrosion This is company policy. We did not see any new jobs to review and verify the design though.	X			
217.	192.479	Pipeline Components exposed to the atmosphere	X			
218.	192.481	Atmospheric Corrosion: monitoring	X			
219.	192.491	Test Stations – Sufficient Number .469	X			
220.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			

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

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

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

Attachment 1

Distribution Operator Compressor Station Inspection

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		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
243.	.605(b)					
244.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
245.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			X	
246.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			X	
247.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
248.		(b) Tank must be protected according to NFPA #30			X	
249.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			X	
250.		• 50% of the upright side areas are permanently open, or			X	
251.		• It is an unattended field compressor station of 1000 hp or less			X	

Comments:

No compression in this unit.

			COMPRESSOR STATION O&M PERFORMANCE AND RECORDS	S	U	N/A	N/C
252.	.709	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)			X	
253.		.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)			X	
254.		.736(c)	Compressor Stations – Detection and Alarms (Performance Test)			X	

Comments:

No compression in this unit.

			COMPRESSOR STATIONS INSPECTION (Field)	S	U	N/A	N/C
			(Note: Facilities may be “Grandfathered”)				
255.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
256.			Door latch must open from inside without a key			X	
257.			Doors must swing outward			X	
258.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
259.			Each gate located within 200 ft of any compressor plant building must open outward			X	
260.			When occupied, the door must be opened from the inside without a key			X	
261.		(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			X	
262.	.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
263.		(b)	Do the liquid separators have a manual means of removing liquids?			X	
264.			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?			X	
265.	.167	(a)	ESD system must:				

Attachment 1

Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
266.		- Discharge blowdown gas to a safe location			X	
267.		- Block and blow down the gas in the station			X	
268.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
269.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
270.		ESD system must be operable from at least two locations, each of which is:				
271.	.167	- Outside the gas area of the station			X	
272.		- Not more than 500 feet from the limits of the station			X	
273.		- ESD switches near emergency exits?			X	
274.	(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?			X	
275.	(c)	Are ESDs on platforms designed to actuate automatically by...				
276.		- For unattended compressor stations, when:				
277.		▪ The gas pressure equals MAOP plus 15%?			X	
278.		▪ An uncontrolled fire occurs on the platform?			X	
279.		- For compressor station in a building, when				
280.		▪ An uncontrolled fire occurs in the building?			X	
281.		▪ 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)?			X	
282.	.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.			X	
283.		(b) Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
284.		(c) Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
285.		(d) Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
286.		(e) Are the mufflers equipped with vents to vent any trapped gas?			X	
287.	.173	Is each compressor station building adequately ventilated?			X	
288.	.457	Is all buried piping cathodically protected?			X	
289.	.481	Atmospheric corrosion of aboveground facilities			X	
290.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
291.		Are facility maps current/up-to-date?			X	
292.	.615	Emergency Plan for the station on site?			X	
293.	.619	Review pressure recording charts and/or SCADA			X	
294.	.707	Markers			X	
295.	.731	Overpressure protection – relief’s or shutdowns			X	
296.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
297.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			X	
298.	.736	Gas detection – location			X	

Comments:

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.

Comments:

No compression in this unit.