

PHMSA Form 16 Question Set (IA Equivalent)
GAS TRANSMISSION INTEGRITY MANAGEMENT IMPLEMENTATION INSPECTION

Name of Operator: Georgia Pacific - Camas, WA		
OPID No. 31096	Insp ID: 5832	
Unit ID No. 31096		
HQ Address:	System/Unit Name & Address:	
401 NE Adams Street Camas, WA 98607	Camas Paper Mill 401 NE Adams Street Camas, WA 98607	
Operator Official: Gary.kaiser@gapac.com	Address: 401 NE Adams Street	
Title: Vice President	City: Camas	
Phone: 360-834-8106	State: WA	
Emergency Phone/Cell: 360-834-3021 Ext. 3213	Zip Code: 98607	
Persons Interviewed	Title	Phone No.
Robert L. Cosentino	President & CEO, Cosentino Consulting Inc.	360-200-4959
Carson Blocker	Reliability Engineer	360-834-8419
Roy Rogers	Consultant Cathodic Protection Engineering, Inc.	503.720.3220
Ron Simmons	Pipeline Manager	386-329-5673
State Representative(s): Scott Rukke		Inspection Date(s): November 2-3, 2014
Records Location: Camas Mill at above address		

Unit Description:
 1.68 miles of primarily 10” steel consisting of API 5L X-42 and X-52 of varying wall thicknesses installed in 1993 and 2010. The pipeline has an established potential MAOP of 800 psig but is limited by WAC proximity rules to 250 psig which gives it an operating SMYS of 10.4%. 10.4%. The pipeline has fusion bonded epoxy coating.
 The entire pipeline is within a class 3 location.
 Odorization is provided by Northwest Natural Gas.

Portion of Unit Inspected:
 IMP records were reviewed in the Camas Mill and the entire segment of transmission from the gate to the inside fence transition point to non-jurisdictional pipeline were driven. The rectifier was checked, CP test sites were checked and the single emergency valve at the gate was operated.

- Sat+ - Exceeds requirements/exemplary performance**
- Sat - Meets requirements**
- Con - “Concern” meets requirements, but is an area of recommendation and/or area that if not addressed may lead to non-compliance**
- Unsat - Does not meet requirements**
- N/A - Not Applicable**
- N/C - Not Checked**

Assessment and Repair - External Corrosion Direct Assessment (ECDA)

12. ECDA Post-Assessment (detail) *From the review of the results of selected integrity assessments, were requirements met for post assessment?* (AR.EC.ECDAPOSTASSESS.R) (detail)

192.925(b)(4) (NACE SP-0502-2002 Section 6.2)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Entire pipeline had an ILI inspection on November 12, 2013. Inspection consisting of deformation and MFL. Run was conducted by Enduro. Final report available for review during the audit. A confirmatory dig was performed at a non-jurisdictional location identified by Enduro as having internal wall loss. The confirmatory dig validated the Enduro findings. Further examination found the metal loss indication to be within acceptable limits and not indicative of internal corrosion. See IM Manual Appendix F for a full discussion. As a precautionary measure a composite sleeve was installed at this location.

Enduro indicated an area 0.043" in depth or about 17%

Actual measured after excavation was 15.6%

ECDA is not used.

Assessment and Repair - Internal Corrosion Direct Assessment

10. Post-Assessment Evaluation and Monitoring (detail) *From the review of the results of selected integrity assessments, did the operator assess the effectiveness of the ICDA process?* (AR.IC.ICDAPOSTASSESS.R) (detail)

192.927(c)(4)(i) (192.927(c)(4)(ii))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Entire pipeline had an ILI inspection on November 12, 2013. Inspection consisting of deformation and MFL. Run was conducted by Enduro. Final report available for review during the audit. A confirmatory dig was performed at a non-jurisdictional location identified by Enduro as having internal wall loss. The confirmatory dig validated the Enduro findings. Further examination found the metal loss indication to be within acceptable limits and not indicative of internal corrosion. See IM Manual Appendix F for a full discussion. As a precautionary measure a composite sleeve was installed at this location.

ICDA is not used.

Assessment and Repair - In-Line Inspection (Smart Pigs)

8. Validation of ILI Results (detail) *From a review of field staff, do the employees and vendors validate ILI assessment results per their procedures?* (AR.IL.ILIVALIDATE.O) (detail)

192.921(a)(1) (B31.8S Section 6.2.6)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Entire pipeline had an ILI inspection on November 12, 2013. Inspection consisting of deformation and MFL. Run was conducted by Enduro. Final report available for review during the audit. A confirmatory dig was performed at a non-jurisdictional location identified by Enduro as having internal wall loss. The confirmatory dig validated the Enduro findings. Further examination found the metal loss indication to be within acceptable limits and not indicative of internal corrosion. See IM Manual Appendix F for a full discussion. As a precautionary measure a composite sleeve was installed at this location.

Enduro indicated an area 0.043" in depth or about 17%

Actual measured after excavation was 15.6%.

IM manual section 7.3.

.7 If corrosion is found an analysis will be conducted to determine the cause of the Corrosion

Reviewed tool run data with one area of metal loss at 11:00. The run was done on 2/26/14

12. ILI Acceptance Criteria (detail) *Do records indicate adequate implementation of the process for ILI survey acceptance?* (AR.IL.ILIACCEPCRITERIA.R) (detail)

192.921(a) (B31.8S Section 6.2.5)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

See section 7 of the IM Manual. Details of how specific repair issues are handled is contained by the O&M manual.

10.4 in the O&M mentions the ClockSpring repair that was done on the pipeline.

15. Compliance with ILI Procedures (detail) *Are O&M and IMP procedural requirements for the performance of ILI followed?* (AR.IL.ILIIMPLEMENT.O) (detail)

192.620(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

The O&M manual contains specific procedures for launching and receiving. These procedures are available for review. The IM manual Section 7 contains specific guidance for specific IM related conditions and timeframes.

P-42 – P44 contains the pig launching and receiving procedures.

Assessment and Repair - Other Technology

4. Other Technology (detail) *From the review of the results of selected integrity assessments, was the assessment performed in accordance with the process and vendor recommendations? (AR.OT.OTPLAN.R) (detail)*

192.921(a)(4)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

"Other Technology" was not used. The ILI was performed fully in alignment with Enduro recommendations.

NOT APPLICABLE

Assessment and Repair - Integrity Assessment Via Pressure Test

2. Pressure Test Results (detail) *From the review of the results of pressure tests, do the test records validate the pressure test? (AR.PTI.PRESSTESTRESULT.R) (detail)*

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e); 192.507(a); 192.507(b); 192.507(c); 192.617; 192.919(e); 192.921(a)(2); B31.8S Section 6.3.4)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No pressure test was performed as part of an IM inspection. Original construction pressure tests are available for inspection.

NOT APPLICABLE

Assessment and Repair - Repair Criteria

9. Field Inspection - Remedial Actions (IM) (detail) *Is anomaly remediation and documentation of remediation adequate for all covered segments? (AR.RC.REMEDIATION.O) (detail)*

192.933(c) (192.933(a); 192.933(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Only one covered segment exists. It encompasses 100% of the jurisdictional pipeline. Reviewed ILI data. This is technically not applicable as it's a field observation.

Assessment and Repair - Repair Methods and Practices

2. Safety While Making Repair (detail) *Are repairs made in a safe manner and to prevent damage to persons and property? (AR.RMP.SAFETY.O) (detail)*

192.605(b)(9) (192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes. Specifics of accidental ignition, and pressure reductions are contained in the O&M Manual.

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5. Prevention of Accidental Ignition (detail) *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition. (AR.RMP.IGNITION.O) (detail)*

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes. Specifics are contained in the O&M Manual section 6.1.

17. Inspection of Welds (detail) *Were welds inspected and examined in accordance with §192.241 and §192.243? (AR.RMP.WELDINSPECT.O) (detail)*

192.241(a) (192.241(b); 192.241(c); 192.243(a); 192.243(b); 192.243(c); 192.243(d); 192.243(e); 192.243(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes. Specifics are contained in the O&M Manual section 11.5.

Pig launcher and receiver were rebuilt. Form number F-35 is used to review contractor qualifications.

25. Transmission Lines Testing of Repairs (detail) *Does the operator properly test replacement pipe and repairs made by welding on transmission lines? (AR.RMP.WELDTTEST.O) (detail)*

192.719(a) (192.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Yes. Specifics are contained in the O&M Manual section 10.6.

No repairs done since last inspection.

Assessment and Repair - Stress Corrosion Cracking

4. Assessment Method (High pH SCC) (detail) *From the review of the results of selected integrity assessments, did the operator perform an assessment using one of the methods specified in B31.8S Appendix A3? (AR.SCC.SCCDAMETHOD.R) (detail)*

192.929(b)(2) (B31.8S Appendix A3)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

See IM Plan Appendix C. In summary ASME B31.8S Appendix A3.3(e) exempts FBE pipeles from SCC analysis.

NOT APPLICABLE ACCORDING TO ASME A3.3

Design and Construction - Construction Welding Procedures

3. Welding Procedures (detail) *Are weld procedures being qualified in accordance with §192.225?*

(DC.WELDPROCEDURE.WELD.O) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See O&M Manual section 11.5.2

Reviewed weld PQR's and procedures.

6. Welding Weather (detail) *Are welding operations are protected from certain weather conditions?*

(DC.WELDPROCEDURE.WELDWEATHER.O) (detail)

192.231

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See O&M Manual section 11.5.5(a)(iv)

11. Preparation for Welding (detail) *Are welding preparations made in accordance with §192.235?*

(DC.WELDPROCEDURE.WELDPREP.O) (detail)

192.235

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See O&M Manual section 11.5.5(a)(v) for general requirements and appendix G for welding procedures.

Reviewed applicable O&M procedures.

Design and Construction - Construction Weld Inspection

3. Inspection and Test of Welds (detail) *Are individuals who perform visual inspection of welding qualified?*

(DC.WELDINSP.WELDVISUALQUAL.O) (detail)

192.241(a) (192.241(b)); 192.241(c); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See O&M Manual section 11.5.5(b) & (c) & (d)

Reviewed welder qualification test reports for pig launcher receiver rebuild.

Welders are not kept current in GP welding procedures but are tested and qualified on an as needed basis.

6. Nondestructive Test and Interpretation Procedures (detail) *Are NDT procedures adequate?*

(DC.WELDINSP.WELDNDT.O) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See O&M Manual section 11.5.5(b) GP does not have specific procedures other than API 1104 acceptance. Third party inspectors are used.

Reviewed NDT qualifications and inspector certifications. All NDT technicians were a minimum of a lever II as required in GP 11.5.5.

GP procedure 11.5.5

b. Nondestructive testing will be performed in accordance with Section 9 of API 1104 by an individual with a minimum certification as a Level II NDE inspector trained in the established procedure and equipment to be used.

9. Repair or Removal of Weld Defects (detail) *Are unacceptable welds removed and/or repaired?*

(DC.WELDINSP.WELDREPAIR.O) (detail)

192.245(a) (192.245(b); 192.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Yes, See O&M Manual section 11.5.6

No weld repairs since last inspection.

Design and Construction - Construction

18. Inspection of Materials (detail) *Are pipe lengths and other pipeline components visually inspected to ensure they are not damaged?* (DC.CO.INSPECTVISUAL.O) (detail)

192.307

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Yes, See O&M Manual section 11.4.2

Good procedure. No materials inspections since last inspection.

21. Repair of Steel Pipe (detail) *Are repairs to steel pipe made in accordance with §192.309?* (DC.CO.REPAIR.O) (detail)

192.309(a) (192.309(b); 192.309(c); 192.309(d); 192.309(e))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Yes, See O&M Manual section 10.3 for criteria and 10.4 for repair

No repairs conducted since last inspection.

34. Installation of Pipe in a Ditch (detail) *When pipe is placed in the ditch, is it installed so as to fit the ditch, minimize stresses, and protect the pipe coating from damage?* (DC.CO.INSTALL.O) (detail)

192.319(a) (192.319(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
Yes, See O&M Manual section 11.4.4

No installations since last inspection.

Design and Construction - Pressure Testing

3. General - Testing Requirements (detail) *Is pressure testing conducted in accordance with §192.503?* (DC.PT.PRESSTEST.O) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Reviewed pressure tests conducted after the launcher/receiver modifications. No issues.

6. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with §192.505?* (DC.PT.PRESSTESTHIGHSTRESS.O) (detail)

192.505(a) (192.505(b); 192.505(c); 192.505(d); 192.505(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Yes, See O&M Manual section 11.5.7

See test review above.

Design and Construction - Training and Qualification

4. Skills and Knowledge of Personnel Performing Covered Tasks - Contractor employees (detail) *Do selected contractor individuals performing covered tasks demonstrate adequate skills and knowledge?* (DC.TQ.OQCONTRACTOR.O) (detail)

192.805(b) (Operators OQ program manual)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Yes, See OQ Manual sections 3.2.1(c) Section 3.3.3 Section 5.8.7

6. Skills and Knowledge of Personnel Performing Covered Tasks - Operator Employee (detail) *Do selected operator individuals performing covered tasks demonstrate adequate skills and knowledge?* (DC.TQ.OQPLANEMPLOYEE.O) (detail)

192.805(b) (Operators OQ program manual)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Yes, See OQ Manual sections 3.2.1 Section 3.3.2 Section 5.8

8. Qualification of Personnel who Oversee and Perform Excavations and Backfilling Operations (detail) *Do selected individuals who oversee marking, trenching and backfilling operations demonstrate adequate skills and knowledge? (DC.TQ.EXCAVATE.O) (detail)*

192.805(b) (ADB-06-01)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, when GP selects a contractor to perform this activity, OQ is part of the selection process.

They use a form to ensure contractors meet necessary qualifications.

10. Qualification of Personnel Performing Hot Taps (detail) *Do personnel performing hot taps demonstrate adequate skills and knowledge? (DC.TQ.HOTTAP.O) (detail)*

192.805(b) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Yes, when GP selects a contractor to perform this activity, OQ is part of the selection process.

They have a hot tap checklist. No hot taps have been performed since installation.

Integrity Management - High Consequence Areas

8. IM High Consequence Areas - Identification Method 1 (Class Locations) (detail) *Do records indicate adequate application of the §192.903 High Consequence Area definition (1) for the identification of HCAs? (IM.HC.HCAMETHOD1.R) (detail)*

192.903 (1)(i) (192.903(1)(ii); 192.903(1)(iii); 192.903(1)(iv))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, the process is described in OQ Manual sections 2

Method 1 (class) is used. Everything but the Washougal River crossing is in a class 3 location. GP treats 100% of the pipeline as a class 3.

10. IM High Consequence Areas - Identification Method 2 (Potential Impact Radius) (detail) *Do records indicate adequate application of §192.903 High Consequence Area definition (2) for identification of HCAs? (IM.HC.HCAMETHOD2.R) (detail)*

192.903(2)(i) (192.903(2)(ii))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Yes, the process is described in OQ Manual sections 2

Class location method 1 is used.

13. IM High Consequence Areas (detail) *Are HCAs correctly identified per up-to-date information?*
(IM.HC.HCADATA.O) (detail)

192.905I

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, the process is described in OQ Manual sections 2.2I & (d) Changes in building use or quantity are identified during each ROW inspection and documented. At this time 100% of the jurisdictional pipeline is considered an HCA

All class 3 no way to be out of date.

Integrity Management – Preventive and Mitigative Measures

3. P&M Measures – Third Party Damage (detail) *Does the preventive and mitigative process include requirements that threats due to third party damage be addressed? (Note: A subset of these enhancements are required for pipelines operating below 30% SMYS – See IM.PM.PMMTPDSMYS.P) (IM.PM.PMMTPD.P) (detail)*

192.917I(1) (192.935(b)(1); 192.935I)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

No, it is not included in the IM plan. It is a part of damage prevention in the O&M manual. GP is a very active participant in the local DP effort as well as nationally.

Appendix I spells out additional measures.

12. P&M Measures – Automatic Shut-Off Valves or Remote Control Valves (detail) *Has an adequate determination been made to determine if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas? (IM.PM.PMMASORCV.R) (detail)*

192.935I

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, see the IM Manual appendix I GP has installed the necessary taps to install a Bettis flowguard at the gate station, but has not done so at the present time.

192.935

GP has an emergency response team that will respond to a line rupture. There is a single valve that would need to be turned off.

13. P&M Measures – Implementation (detail) *Have identified P&MMs to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA been implemented? (IM.PM.PMMIMPLEMENT.O) (detail)*

192.935(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, see the IM Manual appendix I GP has installed the necessary taps to install a Bettis flowguard at the gate station, but has not done so at the present time.

Other additional measures are pipeline markers approximately every 250’.

Cement cap next to the freeway.

Public Awareness and Damage Prevention – ROW Markers, Patrols, Leakage Survey and Monitoring

4. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?*

(PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, the process is described in OM Manual section 5.5. signs are inspected regularly as replaced or repaired as needed.

5. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, the process is described in OM Manual section 5.5. which includes specific spacing and location instructions.

6. ROW Conditions (detail) *Are the ROW conditions acceptable for the type of patrolling used?*

(PD.RW.ROWCONDITION.O) (detail)

192.705(a) (192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, the line is 100% walked on a regular basis.

Time-Dependent Threats - External Corrosion - Coatings

12. Exposed Pipe Coating (detail) *Is exposed buried pipe coating inspected to determine if it is deteriorating?*

(TD.COAT.EXPOSEINSPECT.O) (detail)

192.459

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See OQ Manual sections 4.2

Reviewed records of exposed piping.

Reviewed Form F-10 for pipeline exposure and coating evaluation. 10/26/13, 2/25/14, 6/21/2011

Training and Qualification - Qualification of Personnel - Specific Requirements (O and M Construction)

6. Qualification of Welders (detail) *Do welders demonstrate adequate skills and knowledge?*
(TQ.QUOMCONST.WELDER.O) (detail)

192.227(a) (192.227(b); 192.229(a); 192.229(b); 192.229(c); 192.229(d); 192.805(h); 192.807(a); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See OQ Manual sections 11.5.3

Reviewed records.

Welders are qualified prior to welding on the pipeline. The 6 month requirement does not apply.

9. Qualification of Nondestructive Testing Personnel (detail) *Do nondestructive testing personnel demonstrate adequate skills and knowledge?* (TQ.QUOMCONST.NDT.O) (detail)

192.243(b)(2) (192.807(a); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See OQ Manual section 11.5.5(b)

Reviewed records.

Training and Qualification - Qualification of Personnel - Specific Requirements

5. Qualification of Personnel Tapping Pipelines under Pressure (detail) *Do personnel performing hot taps demonstrate adequate skills and knowledge?* (TQ.QU.HOTTAPQUAL.O) (detail)

192.627 (192.805(h))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Yes, See OQ Manual section 6.6

No hot tapping personnel. No hot taps since initial installation.

8. Qualification of Personnel who Oversee and Perform Excavations and Backfilling Operations (detail) *Do individuals who oversee marking, trenching, and backfilling operations demonstrate adequate skills and knowledge?* (TQ.QU.EXCAVATE.O) (detail)

192.805(b) (192.805(h); ADB-06-01; 192.801(a); 192.328(a); 192.328(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, See OQ Manual section 5.7

Roy Rogers is on site anytime excavation is being conducted.

Training and Qualification - Training of Personnel

3. Emergency Response Training (detail) *Do emergency response personnel demonstrate adequate skills and knowledge?* (TQ.TR.TRAINING.O) (detail)

192.615(b)(2) (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Yes, yearly exercises are held

Yearly emergency training is conducted.

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Covered tasks were observed in the field.
Rectifier check by Roy Rogers with AOC's.
Valve operation by Roy Rogers with AOC's.
Cathodic protection test sites with Roy Rogers including AOC's.

2. Qualification Status (detail) *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Reviewed Roy Rogers' records.

3. Abnormal Operating Condition Recognition and Reaction (detail) *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

See below

4. Verification of Qualification (detail) *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Verified AOC's in OQ program and in field.

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5. Program Inspection Deficiencies (detail) *Have potential issues identified by the headquarters inspection process been corrected at the operational level? (TQ.PROT9.CORRECTION.O) (detail)*

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

<p>Notes</p> <p>No deficiencies noted.</p>

Acceptable Use: Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.