

# 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.

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			
<b>Inspection ID/Docket Number</b>	6774		
<b>Inspector Name &amp; Submit Date</b>	Scott Rukke, December 2, 2016		
<b>Chief Eng Name &amp; Review/Date</b>	Joe Subsits, December 5, 2016		
Operator Information			
<b>Name of Operator:</b>	Cascade Natural Gas Corporation	<b>OP ID #:</b>	2128
<b>Name of Unit(s):</b>	Bellingham District Office		
<b>Records Location:</b>	1910 Racine Street Bellingham WA		
<b>Date(s) of Last (unit) Inspection:</b>	May 13-16, 2013	<b>Inspection Date(s):</b>	Nov. 14 – 17, 2016

<p><b>Inspection Summary:</b></p> <p>Rocords and field inspection. Reviewed operations, maintenance and emergency response records for the Bellingham district in the district main office. 100% of leak records were reviewed. Conducted a random facility field inspection at various locations throughout the Bellingham district and employees were observed conducting operator qualification covered tasks.</p>
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<b>HQ Address:</b> Cascade Natural Gas Corporation 8113 W. Grandridge Blvd Kennewick WA 99336	<b>System/Unit Name &amp; Address:</b> Cascade Natural Gas Corporation 1910 Racine Street Bellingham WA 98229-4707	
<b>Co. Official:</b> Eric Martuscelli <b>Phone No.:</b> (509) 572-0294 <b>Fax No.:</b> (509) 737-9803 <b>Emergency Phone No.:</b> 1-888-522-1130	<b>Phone No.:</b> (360) 733-5981 <b>Fax No.:</b> (360) 733-1416 <b>Emergency Phone No.:</b> 1-888-522-1130	
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>
Kathy Bergner	District Manager	(360) 788-2345
Greg Nelson	District Operations Manager	(360) 788-2370
Chanda Marek	Region Director	(360) 405-4220
Vicki Ganow	Pipeline Safety Specialist	(360) 788-2381
Mike Eutsey	Manager, Standards & Compliance	(509) 734-4576

<p><b>WUTC staff conducted an abbreviated procedures inspection on 192 O&amp;M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.</b></p> <p style="text-align: center;">(check one below and enter appropriate date)</p>			
<input checked="" type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	<b>Date:</b>	May 2013
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	<b>Date:</b>	Unknown

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<input checked="" type="checkbox"/>	OQ Program Review (PHMSA Form 14)	<b>Date:</b>	Unknown
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GAS SYSTEM OPERATIONS				
<b>Gas Supplier</b>		Williams, Spectra		
<b>Services:</b> <i>Residential</i> 42856 <i>Commercial</i> 5019 <i>Industrial</i> 78 <i>Other</i> 0				
Number of reportable safety related conditions last year		NONE		
Number of <u>non-reportable</u> safety related conditions last year		NONE		
Number of deferred leaks in system		6		
Number of third party hits last year		33		
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)		59.98		
Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)		849.14		
<b>Operating Pressure(s):</b>		<b>MAOP (Within last year)</b>		<b>Actual Operating Pressure (At time of Inspection)</b>
Feeder:	Williams Spectra			
Town:	Bellingham O-7 Acme O-6 Bellingham O-8 Deming O-5 Lawrence O-4 Nooksack O-3	Sumas O-9	145 150 960 150 150 250 780	780
Other:	N/A	N/A	N/A	N/A
Does the operator have any transmission pipelines?		YES		
Compressor stations? Use Attachment 1.		NO		
Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues?    Yes <input type="checkbox"/> No <input type="checkbox"/>				
<b>Comments:</b>				

Pipe Specifications:																									
Year Installed (Range)	1952 to present	Pipe Diameters (Range)	½" to 20"																						
Material Type	Steel and PE	Line Pipe Specification Used	API, 5L, 3408 PE, 2406 MDPE, X42, X52, X46, X65																						
Mileage	Transmission: 59.98 Main: 849.14 Service: 639.2	SMYS %	<table style="width: 100%; border: none;"> <tr><td>8" Bellingham #1</td><td style="text-align: right;">36.3%</td></tr> <tr><td>8" Central Whatcom #3</td><td style="text-align: right;">36.3%</td></tr> <tr><td>8" Lake Terrell Rd. #9</td><td style="text-align: right;">24.9%</td></tr> <tr><td>16" North Whatcom #10</td><td style="text-align: right;">36.9%</td></tr> <tr><td>8" Kickerville #11</td><td style="text-align: right;">26.5%</td></tr> <tr><td>12" Grandview Road #13</td><td style="text-align: right;">36.4%</td></tr> <tr><td>4" West Lynden #16</td><td style="text-align: right;">20.5%</td></tr> <tr><td>20" Ferndale #18</td><td style="text-align: right;">30.8%</td></tr> <tr><td>20" Sumas #19</td><td style="text-align: right;">40.0%</td></tr> <tr><td>8" South Kickerville #20</td><td style="text-align: right;">16.8%</td></tr> <tr><td>16" Squalicum #21</td><td style="text-align: right;">29.7%</td></tr> </table>	8" Bellingham #1	36.3%	8" Central Whatcom #3	36.3%	8" Lake Terrell Rd. #9	24.9%	16" North Whatcom #10	36.9%	8" Kickerville #11	26.5%	12" Grandview Road #13	36.4%	4" West Lynden #16	20.5%	20" Ferndale #18	30.8%	20" Sumas #19	40.0%	8" South Kickerville #20	16.8%	16" Squalicum #21	29.7%
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### Operator Qualification Field Validation

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**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** 12/2/2016

PART 199 Drug and Alcohol Testing Regulations and Procedures		S	U	NA	NC
<b>Subparts A - C</b>	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
<b>1.</b>	<b>49 U.S.C. 60132, Subsection (b)</b>	<p><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</b> 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 <a href="mailto:opsgis@rspa.dot.gov">opsgis@rspa.dot.gov</a> stating that fact.</u> Include operator contact information with all updates.</p> <p><b>Not inspecting transmission during this inspection.</b></p>			X	
<b>2.</b>	RCW 81.88.080	<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><b>Last transmission of data was April 2012 during the last transmission audit.</b></p>	X			
<b>3.</b>	191.5	<p>Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at <a href="http://www.nrc.uscg.mil/nrchp.html">http://www.nrc.uscg.mil/nrchp.html</a>, 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><b>No incidents.</b></p>			X	
<b>4.</b>	191.7	<p>Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> at unless an alternative reporting method is authorized IAW with paragraph (d) of this section.</p> <p><b>No incidents.</b></p>			X	
<b>5.</b>	191.15(a)	<p>30-day follow-up written reports to PHMSA (<b>Form F7100.2</b>) Submittal must be electronically to <a href="http://pipelineonlinereporting.phmsa.dot.gov">http://pipelineonlinereporting.phmsa.dot.gov</a></p> <p><b>No incidents.</b></p>			X	
<b>6.</b>	191.15(c)	<p>Supplemental report (to 30-day follow-up)</p> <p><b>No incidents.</b></p>			X	
<b>7.</b>	191.17	<p>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).</p>	X			
<b>8.</b>	191.22	<p>Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a></p> <p><b>Validated on April 5, 2012.</b></p>	X			
<b>9.</b>	191.23	<p>Filing the <b>Safety Related Condition Report (SRCR)</b></p> <p>None in district</p>			X	

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REPORTING RECORDS			S	U	N/A	N/C
10.	191.25 49 U.S.C. 60139, Subsection (b)(2)	<p>Filing the SRCR within 5 days of determination, but not later than 10 days after discovery.</p> <p><b>Note:</b> 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 <b>on or before the fifth day</b> following the date on which the exceedance occurs.</p> <p>The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The name, job title, and business telephone number of the person who determined the condition exists.</li> <li>• The date the condition was discovered and the date the condition was first determined to exist.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>None in district.</p>			X	
11.	.605(d)	<p>Instructions to enable operation and maintenance personnel to recognize potential <b>Safety Related Conditions</b></p> <p><b>In OQ and Procedures manual.</b></p>	X			
12.	191.27	<p>Offshore pipeline condition reports – filed within 60 days after the inspections</p> <p>None in district.</p>			X	
13.	192.727(g)	<p>Abandoned facilities offshore, onshore crossing commercially navigable waterways reports</p> <p>None in district.</p>			X	
14.	480-93-200(1)	<p>Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9144</b> (Within <b>2 hours</b>) for events which results in;</p>				
15.	480-93-200(1)(a)	<p>A fatality or personal injury requiring hospitalization; None in district</p>			X	
16.	480-93-200(1)(b)	<p>Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; None in district</p>			X	
17.	480-93-200(1)(c)	<p>The evacuation of a building, or high occupancy structures or areas;</p>	X			
18.	480-93-200(1)(d)	<p>The unintentional ignition of gas;</p> <p>None in district.</p>			X	
19.	480-93-200(1)(e)	<p>The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;</p>	X			
20.	480-93-200(1)(f)	<p>A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;</p> <p>None in district.</p>			X	
21.	480-93-200(1)(g)	<p>Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection;</p>	X			
22.	480-93-200(2)	<p>Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146</b> (Within <b>24 hours</b>) for;</p>				
23.	480-93-200(2)(a)	<p>The uncontrolled release of gas for more than two hours;</p>	X			

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REPORTING RECORDS			S	U	N/A	N/C
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;  None in district.			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  None in district.			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP  None in district.			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;  No deaths	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;  <b>Cascade uses Form CNG-234 form.</b>	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 ((operator's)) 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  Per O&M procedure.	X			
41.	480-93-200(6)	Written report within 5 days of receiving the <b>failure analysis</b> of any incident or hazardous condition due to <b>construction defects or material failure</b>  Project numbers 229226 and 219347 were reviewed.	X			
42.	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (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)  <b>Cascade uses CNG 835 to record the necessary information.</b>	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? <b>Note:</b> Records maintained for two years and made available to the commission upon request.	X			

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REPORTING RECORDS			S	U	N/A	N/C
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"> <li>Notification requirements for excavators under RCW 19.122.050(1)</li> </ul>	X			
48.	480-93-200(8)(b)	<ul style="list-style-type: none"> <li>A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and</li> </ul>	X			
49.	480-93-200(8)(c)	<ul style="list-style-type: none"> <li>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.</li> </ul>	X			
50.	480-93-200(9)	<p><b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b></p> <ul style="list-style-type: none"> <li>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)</li> <li>A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b)</li> </ul> <p>Cascade uses Form CNG-836 <b>Transmission question.</b></p>	X			
51.	480-93-200(10)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> 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	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	<b>Customer notification</b> - Customers notified, within <b>90 days</b> , 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?	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	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified <b>2/Yr (7.5Months)</b>  <b>No appendix C welders.</b>			X	
64.	480-93-080(2)	Plastic pipe joiners re-qualified <b>1/Yr (15 Months)</b>	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 <b>1/Yr (12Months)</b>  <b>Not tracked, NTE 12 months.</b>			X	
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992  No records observed.			X	
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains  No records observed.			X	
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services  None observed.			X	
70.	192.241(a)	Visual Weld Inspector Training/Experience	X			
71.	192.243(b)(2)	Nondestructive Technician Qualification  Uses Northwest Inspection for NDT.	X			
72.	192.243(c)	NDT procedures	X			
73.	192.243(f)	Total Number of Girth Welds	X			
74.	192.243(f)	Number of Welds Inspected by NDT	X			
75.	192.243(f)	Number of Welds Rejected  None			X	
76.	192.243(f)	Disposition of each Weld Rejected	X			
77.	.273/.283	Qualified Joining Procedures Including Test Results	X			
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances  Not observed but procedures require proper clearance.			X	
80.	192.327	Amount, location, cover of each size of pipe installed	X			
81.	480-93-160(1)	Report filed <b>45 days</b> prior to construction or replacement of transmission pipelines <b>≥ 100</b> feet in length  <b>No transmission looked at during a standard distribution insp.</b>				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: <b>No transmission looked at during a standard distribution insp.</b>				X
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline;  <b>No transmission looked at during a standard distribution insp.</b>				X

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CONSTRUCTION RECORDS			S	U	N/A	N/C
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.  <b>No transmission looked at during a standard distribution insp.</b>				X
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  <b>No transmission looked at during a standard distribution insp.</b>				X
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed;  <b>No transmission looked at during a standard distribution insp.</b>				X
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route.  <b>No transmission looked at during a standard distribution insp.</b>				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; <b>No transmission looked at during a standard distribution insp.</b>				X
89.	480-93-160(2)(g)	Welding specifications; and <b>No transmission looked at during a standard distribution insp.</b>				X
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. <b>No transmission looked at during a standard distribution insp.</b>				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? <b>No transmission looked at during a standard distribution insp.</b>				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 district.			X	
96.	480-93-175(4)	Leak survey within <b>30 days</b> of moving or lowering pipelines $\leq 60$ psig  None in district.			X	

**Comments:**

Reviewed a large High Pressure job (#218481) conducted in Blaine WA at Peace Portal Dr and Dakota Creek.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
97.	192.517(a)	Pressure Testing (operates at or above 100 psig) – <b>useful life of pipeline</b>	X			
98.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – <b>5 years</b>	X			
99.	192.605(a)	Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> ) <b>Note:</b> Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09	X			



## Attachment 1

### Distribution Operator Compressor Station Inspection

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
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 <b>6 months</b> of completion of construction activity?	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures			X	
104.	192.609	<b>Transmission.</b> Class Location Study (If applicable)			X	
105.	192.611	Confirmation or revision of MAOP <b>Transmission</b>			X	
106.	192.614	<b>Damage Prevention (Operator Internal Performance Measures)</b>				
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) <b>All locates are done in house.</b>	X			
108.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?  In house locators.			X	
109.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?  In house locators			X	
110.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?  Yes	X			
111.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
112.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	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?	X			
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? 2. In the case of blasting, does the inspection include leakage surveys?  None witnessed requiring follow up.			X	

**Comments:**

# Attachment 1

## Distribution Operator Compressor Station Inspection

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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) <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response  <b>Emergency policy CP-925 Incident Command System revised April 2016</b>	X																													
117.	192.615(b)(1)	Location Specific Emergency Plan  <b>Plan book was reviewed. Revised November 2016.</b>	X																													
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training  <b>CP-925 now requires emergency training by mock drills 2X per year. Records were reviewed for 2016.</b>	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:				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																														
125.		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Stakeholder Audience (LDC's)</th> <th style="text-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 style="text-align: center;">Stakeholder Audience (Transmission line operators)</th> <th style="text-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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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.				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 <b>June 20, 2010</b> . .616(h)				X																										

# Attachment 1

## Distribution Operator Compressor Station Inspection

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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.				X
130.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 <b>Note:</b> Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10)	X			

**Comments:**  
**Public awareness is on form W now.**

131.	192.619/621/623	Maximum Allowable Operating Pressure ( <b>MAOP</b> ) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)  <b><u>Violation written. See cover letter and report #1</u></b>		X		
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing  Reviewed 2014, 2015 and 2016	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements  None observed below min requirements.			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? <b>1/yr(15 months)</b>	X			
137.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b>	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 <b>&gt;60 psig?</b> Procedures and specifications submitted <b>45 days</b> prior?  <b>No uprates in district.</b>			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;  <b>None observed.</b>			X	
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained?  <b>None observed.</b>			X	
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within <b>30 days</b> 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			

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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)	X			
148.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

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)

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, None in district			X	
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected, None in district			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  <b>Note to review requirements and possibly add a mention in any letter regarding checks of mapping etc. or R/W map issues. (AOC)</b>	X			
156.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705  <b>Transmission. Remove question.</b>				X

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)

157.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706  <b>Transmission. Remove question.</b>				X
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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)  <b>All patrols done quarterly.</b>	X			

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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"> <li>• Outside Business District (5 years)</li> <li>• Cathodically unprotected distribution lines (3 years)</li> </ul>	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 <b>None in district.</b>			X	
164.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X			
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 <b>Transmission. Remove question.</b>	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 <b>Included in the regulator station maintenance records. Form CP-287A</b>	X			
170.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751 <b>Nothing observed during this inspection.</b>				X
171.	192. 603(b)	Welding – Procedure 192.225(b) <b>Reviewed during large job package review.</b>	X			
172.	192. 603(b)	Welding – Welder Qualification 192.227/.229 <b>Reviewed requalifications back to 2013.</b>	X			
173.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) <b>Northwest Inspection Co conducted NDT testing for CNG.</b>	X			
174.	192.709	NDT Records (pipeline life) .243(f) <b>Reviewed records for Job #218481 in Blaine.</b>	X			
175.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) <b>Transmission question. Remove.</b>				X
176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area’s (HCA’s) <b>Transmission question. Remove.</b>				X

**Comments:**

CNG allows a company employee, any company employee to be a witness that a welder made a weld which is then sent to Yakima to be tested. Welders measure their own essential variables.

CNG seemed to have a high number of leaks in Bellingham caused by bad leaking welds. Is there a correlation.  
Weld leaks – 2014 68 leaks with 10 as weld or material  
2015 63 leaks with 4 as weld or material  
2016 so far 26 leaks with 2 as weld or material

### 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)  Per procedure yes.	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
178.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)	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)  <b>No short sections</b>			X	
180.	192.491	Test Lead Maintenance .471	X			
181.	192.491	Maps or Records .491(a)	X			
182.	192.491	Examination of Buried Pipe when exposed .459	X			
183.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
184.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)  <b>2014-16 records</b>	X			
185.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)  <b>2014-16 records</b>	X			
186.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c)  <b>One critical bond between CNG and Olympic Pipeline. Bond read on 4/9/2014 and again on 6/11/2014 not on 8/13/2014. Read again on 10/14/2014.</b>  <b>Bond was disconnected during an OPL close interval survey and then reconnected after the survey was completed.</b>	X			
187.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) <b>None observed in district.</b>			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)  <b>No unptotected pipelines.</b>			X	
191.	192.491	Electrical Isolation (Including Casings) .467  <b>Several shorted casings that were all leak surveyed on schedule.</b>	X			
192.	480-93-110(5)	Casings inspected/tested annually not to exceed <b>fifteen months</b>	X			
193.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	X			
194.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within <b>90 days</b>	X			
195.	480-93-110(5)(c)	Casing shorts cleared when practical	X			
196.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. <b>Twice annually/7.5 months</b>	X			
197.	192.491	Interference Currents .473	X			
198.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)  <b>No corrosive gasses transported.</b>			X	
199.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	X			
200.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477  <b>Not used.</b>			X	

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
201.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481	X			
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	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?	X			
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables <b>Not observed.</b>			X	
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	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.	X			
208.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified?	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 ( <i>for buried pipelines installed after 7/31/71</i> )	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 <b>Not observed.</b>			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			
221.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
222.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	X			
223.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
224.	192.605	Knowledge of Operating Personnel	X			
225.	480-93-124	Pipeline markers	X			
226.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b>	X			
227.	192.719	Pre-pressure Tested Pipe ( <b>Markings and Inventory</b> ) Observed in yard	X			
228.	192.195	Overpressure protection designed and installed where required?	X			
229.	192.739/743	Pressure Limiting and Regulating Devices ( <b>Mechanical/Capacities</b> )	X			
230.	192.741	Telemetry, Recording Gauges			X	

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		<b>Not observed.</b>				
231.	192.751	Warning Signs <b>Not observed.</b>				X
232.	192.355	Customer meters and regulators. Protection from damage	X			
233.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. <b>Not observed.</b>				X
234.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
235.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) <b>Observed in yard.</b>	X			
236.	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.	X			
237.	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			
238.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? <b>Yes No X</b>				
239.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?			X	
240.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?			X	
241.	192.745	Valve Maintenance (Transmission), Transmission in a separate unit			X	
242.	192.747	Valve Maintenance (Distribution) <b>Not observed in field.</b>				X

**Facility Sites Visited:**

Facility Type	Facility ID Number	Location
See field form.		

**Comments:**