

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Form D - 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, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

Inspection Report			
Inspection ID/Docket number	7569		
Inspector Name & Submit Date	Anthony Dorrough 06/26/2018		
Chief Eng Name & Review Date	Joe Subsits, 7/2/2018		
Operator Information			
Name of Operator:	Inland Empire Paper Company (IEP)	OP ID #:	8140
Name of Unit(s):	Headquarters		
Records Location:	3320 N Argonne Rd, Spokane WA		
Date(s) of Last (unit) Inspection:	May 29 – June 1, 2012	Inspection Date(s):	May 31 – June 1, 2018

<p>Inspection Summary:</p> <p>This inspection consisted of comprehensive field and records review. Staff drove the entire pipeline and recorded CP reads with rectifier interrupter in service. IEP will shut-down the rectifier later this year to get an accurate native potential read. All CP reads showed adequate protection. There were some OQ and equipment calibration records for the newly hired CP contractor that were not immediately available for review during the inspection but was eventually provided and everything was found to be in order. Staff noted that there was a lapse in CP records between May 1, 2017 – November 1, 2017 and IEP provided that this was due to the transition during Ray Allen’s retirement and the subsequent procurement of a new CP contractor.</p>

HQ Address: 3320 N Argonne Rd, Spokane WA	System/Unit Name & Address: Same	
Co. Official: Kevin Davis	Phone No.: Same	
Phone No.: 509 924-1911	Fax No.: Same	
Fax No.: 509 924-8461	Emergency Phone No.: Same	
Emergency Phone No.: 509 924-1911		
Persons Interviewed	Title	Phone No.
Kevin Davis	Production Manager	509 924-1911
Doug P. Krapas	Environmental Manager	509 924-1911 ext. 363

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

GAS SYSTEM OPERATIONS			
Gas Supplier	Williams West		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	0
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	0
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	3.5 miles – The area is class 2, but it is classified as a 3		
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	150	780	
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	No		
Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Comments: None			

Pipe Specifications:			
Year Installed (Range)	In service 1988	Pipe Diameters (Range)	4-inch
Material Type	Carbon Steel	Line Pipe Specification Used	5L X42 & ASTM A106
Mileage	3.5	SMYS %	6.4%
Supply Company	Williams West	Class Locations	1-3

REPORTING RECORDS				S	U	N/A	N/C
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	X				
2.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which (regardless of cause);					
3.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization;				X	
4.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; Note: Report all damages regardless if claim was filed with pipeline company or not.				X	
5.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas;				X	

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REPORTING RECORDS			S	U	N/A	N/C
6.	480-93-200(1)(d)	Results in the unintentional ignition of gas;			X	
7.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;			X	
8.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;			X	
9.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or			X	
10.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 24 hours) for;			X	
11.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			X	
12.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;			X	
13.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
14.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP			X	

Comments:
Q1 thru 14- Nothing to report.

15.	480-93-200(5)	Written incident reports (within 30 days) including the following;	S	U	N/A	N/C
16.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;			X	
17.	480-93-200(4)(b)	The extent of injuries and damage;			X	
18.	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	
19.	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	
20.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
21.	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site;			X	
22.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;			X	
23.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;			X	
24.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;			X	
25.	480-93-200(4)(j)	Line type;			X	
26.	480-93-200(4)(k)	City and county of incident; and			X	
27.	480-93-200(4)(l)	Any other information deemed necessary by the commission.			X	
28.	480-93-200(5)	Submit a supplemental report if required information becomes available			X	
29.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure			X	

Comments:
Q15 thru Q29- Nothing to report.

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30.	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)				
31.	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)			X	
32.	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 without <u>facility locates</u> first being completed?			X	
33.	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.			X	
34.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
35.	480-93-200(8)(a)	<ul style="list-style-type: none"> • Notification requirements for excavators under RCW 19.122.050(1) 			X	
36.	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	
37.	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	
38.	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) 			X	
39.	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)			X	
40.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year. (<i>NOTE: PHMSA extension to June 15, 2013 for the year 2012.</i>)	S	U	N/A	N/C
41.	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			
42.	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. -No reports			X	
43.	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			
44.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
45.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments: Q30 to Q39- Nothing to report.	
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CONSTRUCTION RECORDS			S	U	N/A	N/C
46.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			X	
47.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
48.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main			X	
49.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
50.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length			X	
51.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines			X	
52.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule)			X	
53.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig			X	

Comments:
 Q46 to Q53- No construction

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C								
54.	Damage Prevention Program													
55.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample.	X											
56.	480-93-015(1)	Odorization of Gas – Concentrations adequate?	X											
57.	480-93-015(2)	Monthly Odorant Sniff Testing	X											
58.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements	X											
59.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X											
60.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) -No markers on bridges			X									
61.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X											
62.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained			X									
63.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained			X									
64.	480-93-187	Gas Leak records - Content			X									
65.	480-93-188(1)	Gas Leak surveys - Coverage	X											
66.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days)	X											
67.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X											
<table border="1" style="margin: auto; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Business Districts (By 6/02/07)</td> <td style="padding: 5px; text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">High Occupancy Structures</td> <td style="padding: 5px; text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">Pipelines Operating ≥ 250 psig</td> <td style="padding: 5px; text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="padding: 5px;">Other Mains: CI, WI, copper, unprotected steel</td> <td style="padding: 5px; text-align: center;">2/yr (7.5 months)</td> </tr> </table>							Business Districts (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)
Business Districts (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)													
68.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs			X									

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
69.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred			X	
70.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected			X	
71.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions			X	
72.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings.			X	
73.	480-93-188(5)	Gas survey records: Retention/Content	X			
74.	480-93-188(6)	Leak Survey Program/Self Audits	X			

Comments:
 Q62 to Q64- No gas leaks.
 Q68 to Q72- No special leak surveys

CORROSION CONTROL RECORDS			S	U	N/A	N/C
75.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed			X	
76.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)			X	
77.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched)	X			
78.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
79.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods			X	
80.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days			X	
81.	480-93-110(5)(c)	Casing shorts cleared when practical			X	
82.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months			X	

Comments:
 Q75 to Q76- None of these procedures were needed.
 Q79 to Q82- No casings w/no test leads or shorted conditions.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
83.	480-93-015(1)	Odorization levels	X			
84.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) – No casing w/o vents			X	

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Comments:

EXIT INTERVIEW	
Exit Interview Conducted? Yes Items Covered: N/A	Date: June 1, 2018

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
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.

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