Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Systems
Procedures and Plan Review

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 **Inspection Checklist, Cover Letter and Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/Docket Number	7923		
Inspector Name & Submit Date	Tony Dorrough / Darren Tinnerstet		
Sr. Eng Name & Review/Date	Joe Subsits, 12/16/2019		
Operator Information			
Name of Operator:	City of Ellensburg	**OP ID #:**	04400
Name of Unit(s):	Headquarters		
Records Location:	Energy Services Division, Ellensburg City Hall, 501 N. Anderson St. Ellensburg, WA 98926		
Date(s) of Last Review:	Aug. 3, 2015	**Inspection Date**	8/9/2019

Inspection Summary:

This inspection included a review of City of Ellensburg's Codes of Practice and a review of pipeline locate records.. Upon review of these documents and the addition to Section 1, no issues were found.

HQ Address:		**System/Unit Name & Address:**	
501 N Anderson St Ellensburg, WA 98926		N/A	
Co. Official:	John Akers	**Phone No.:**	N/A
Phone No.:	(509) 962-7220	**Fax No.:**	N/A
Fax No.:	(509) 925-8662	**Emergency Phone No.:**	N/A
Emergency Phone No.:	(509) 925-8534		N/A

Persons Interviewed	**Title**	**Phone No.**
Darren Larsen	Assistant Utilities Director	(509) 962-7227

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GAS SYSTEM OPERATIONS		
Gas Supplier		
Operating Pressure(s):	**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder: 150 psig	150 psig	
Town:	42 psig	
Other:		
Does the operator have any transmission pipelines?		

Pipe Specifications:			
Year Installed (Range)	1956	Pipe Diameters (Range)	½" to 6"
Material Type	Steel and PE	Line Pipe Specification Used	Grade B 35,000 API 5L ASTM A53, A106 PE ASTM D2513, PE 3408/100
Mileage	120 miles	SMYS %	9%

49 CFR PART 191 & CHAPTER 480-93 WAC

		REPORTING PROCEDURES	S	U	N/A	N/C
1.	480-93-180 (1)	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. (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). .191.5 *****Notes - Operations and Maintance Manual (OMM) Section 15.4.1**	X			
2.		Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline unless an alternative reporting method is authorized IAW with paragraph (d) of this section. (Amdt. 191-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). 191.7 *****Notes - OMM Section 15.4.1**	X			
3.		Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9144** (Within **2 hours**) for events which; 480-93-200(1) 7 *****Notes - OMM Section 15.5.1**				
4.		(a) Results in a fatality or personal injury requiring hospitalization;	X			
5.		(b) Results in damage to the property of the operator and others of a combined total exceeding fifty thousand dollars;	X			
6.		(c) Results in the evacuation of a building, or high occupancy structures or areas	X			
7.		(d) Results in the unintentional ignition of gas;	X			
8.		(e) Results in the unscheduled interruption of service furnished by any operator to twenty-five or more distribution customers;	X			
9.		(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			
10.		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			
11.		Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within **24 hours**) for; 480-93-200(2) *****Notes - OMM Section 15.5.1**	X			
12.		(a) The uncontrolled release of gas for more than two hours;	X			
13.		b) The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;	X			
14.		(c) A pipeline or system operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or	X			
15.	480-93-180 (1)	(d) A pipeline or system pressure exceeding the MAOP.	X			

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		REPORTING PROCEDURES	S	U	N/A	N/C
16.		30 day written incident (federal) reports; (DOT Form F 7100.1) 191.9(a) For Transmission & Gathering Lines; (DOT Form F 7100.2) 191.15(a)30-day follow-up written report Submittal must be electronically to http://portal.phmsa.dot.gov/pipeline (Amdt. 192-115, 75 FR 72878, November 26, 2010, eff. 1/1/2011). *****Notes - OMM Section 15.4.2**	X			
17.		Supplemental incident reports 191.15(c) *****Notes - OMM Section 15.4.2**	X			
18.		Written incident reports **filed with the commission** (within 30 days); and include the following; 480-93-200(4) (a) thru (g) *****Notes - OMM Section 15.5.2**	X			
19.	480-93-180 (1)	Supplemental reports **filed with the commission** 480-93-200(5) *****Notes - OMM Section 15.5.2**	X			
20.	480-93-180 (1)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure 480-93-200(6) *****Notes - OMM Section 15.5.2**	X			
21.		Annual Report (DOT Form PHMSA F-7100.2-1) For Transmission & Gathering 191.17(a) Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(NOTE: June 15, 2013 for the year 2012).*			X	
22.	480-93-180 (1)	**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) 480-93-200(7)				
23.		Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) 480-93-200(7)(a) *****Notes - OMM Section 10.3.2**	X			
24.		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 facility locates first being completed? 480-93-200(7)(b) *****Notes - OMM Section 10.3.2 (C)**	X			
25.		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? 480-93-200(7)(c) **Note:** Records maintained for two years and made available to the commission upon request. *****Notes - OMM Section 10.3.2 (D)**	X			
26.		Does the operator provide the following information to excavators who damage gas pipeline facilities? 480-93-200(8) *****Notes - OMM Section 10.3.2 (E)**				
27.		• Notification requirements for excavators under RCW 19.122.050(1) 200(8)(a)	X			
28.		• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 200(8)(b)	X			
29.		• 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. 200(8)(c)	X			
30.		**Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities…** • 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) *****Notes - OMM Section 10.3.2 (F)**	X			
		Annual Reports **filed with the commission** no later than March 15 for the proceeding calendar year 480-93-200(10)				
31.		A copy of PHMSA form F-7100.1-1 or F-7100.2-1 annual report required by the PHMSA/OPS 480-93-200(10)(a) *****Notes - OMM Section 1.2.10**	X			
32.		Annual report on construction defects or material failures 480-93-200(10)(b) *****Notes - OMM Section 1.2.10**	X			
33.		Providing updated emergency contact information to the Commission and appropriate officials 480-93-200(11) *****Notes - OMM Section 15.1.9**	X			
34.	480-93-180 (1)	Providing daily construction and repair activities reports 480-93-200(12) *****Notes - OMM Section 1.3.10**	X			

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REPORTING PROCEDURES			S	U	N/A	N/C
35.		Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form (when required) 480-93-200(13) *****Notes – D&A Plan**	X			
36.		Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline 191.22 *****Notes - OMM Section 1.0**	X			
37.		Safety related condition reports (SRCR) 191.23 *****Notes - OMM Section 15.4.4**	X			
38.		Filing the SRCR within 5 days of determination, but not later than 10 days after discovery 191.25; 49 U.S.C. 60139, Subsection (b)(2) **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. *****Notes - OMM Section 15.4.4** The report should be titled ''Gas Transmission MAOP Exceedance'' and provide the following information: • 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			
39.	192.605(d)	Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions? *****Notes - OMM Section 15.4.3**	X			

Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002			S	U	N/A	N/C
	49 U.S.C. 60132, Subsection (b) **ADB-08-07**	Updates to NPMS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to http://www.npms.phmsa.dot.gov/submission/ to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates. *****Notes – No gathering or transmission lines.**			X	
	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? *****Notes – No gathering or transmission lines.**			X	

Comments:

Item 21 – City of Ellensburg (CoE) has no gathering lines and no transmission lines

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		49 CFR PART 192 SUBPART A – GENERAL CHAPTER 480-93 WAC – GAS COMPANIES---SAFETY	S	U	N/A	N/C
40.	480-93-180 (1)	Procedures for notifying new customers, within **90 days**, of their responsibility for those selections of service lines not maintained by the operator. §192.16 *****Notes - OMM Section 14.4**	X			
41.		Conversion to Service - Any pipelines previously used in service not subject to Part 192? 192.14 *****Notes - OMM Section 1.2.15**				

Comments:

		SUBPART B - MATERIALS	S	U	N/A	N/C
		Are minimum requirements prescribed for the selection and qualification of pipe and components for use in pipelines 192.51				
42.	480-93-180 (1)	For **steel** pipe, manufactured in accordance with and meet the listed specification found under Appendix B 192.55 *****Notes - OMM Section 2.1**	X			
		For **new** plastic pipe, qualified for use under this part if: 192.59(a)				
43.	480-93-180 (1)	• It is manufactured in accordance with a listed specification; and 192.59(a)(1) • It is resistant to chemicals with which contact may be anticipated. 192.59(a) (2) *****Notes - OMM Section 2.3**	X			
		For **used** plastic pipe, qualified for use under this part if: 192.59(b)				
44.	480-93-180 (1)	• It was manufactured in accordance with a listed specification; 192.59(b)(1) • It is resistant to chemicals with which contact may be anticipated; 192.59(b)(2) • It has been used only in natural gas service. 192.59(b)(3)(4) • Its dimensions are still within the tolerances of the specification to which it was manufactured; and, 192.59(b) • It is free of visible defects. 192.59(b)(5)			X	
45.		Marking of Materials 192.63 *****Notes - OMM Section 2.0**	X			

Comments:

Item 44 – Used plastic pipe is not permitted in CoE's system

		SUBPART C – PIPE DESIGN				
		Procedures for assuring that the minimum requirements for design of pipe are met				
		For Steel Pipe	**S**	**U**	**N/A**	**N/C**
46.		Pipe designed of sufficient wall thickness, or installed with adequate protection, to withstand anticipated external pressures and loads that will be imposed on the pipe after installation. 192.103 *****Notes - OMM Section 2.0**	X			
47.		Design formula for steel pipe. 192.105(a) *****Notes - OMM Section 2.0**	X			
48.	480-93-180 (1)	Yield strength (S) for steel pipe. 192.107 *****Notes - OMM Section 2.0**	X			

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SUBPART C – PIPE DESIGN						
49.	480-93-180 (1)	Nominal wall thickness (t) for steel pipe. 192.109 (a) & (b) (a) If the nominal wt is not known….. Determined by measuring the thickness of each piece of pipe at quarter points on one end unless….. (b) If the pipe is of uniform grade, size, and thickness and more than 10 lengths of pipeline, only 10 percent of the individual lengths, but not less than 10 lengths, need be measured. The thickness of the lengths that are not measured must be verified by applying a gauge set to the minimum thickness found by the measurement. The nominal wall thickness to be used in the design formula in §192.105 is the next wall thickness found in commercial specifications that is below the average of all the measurements taken. However, the nominal wall thickness used may not be more than 1.14 times the smallest measurement taken on pipe less than 20 inches (508 millimeters) in outside diameter, nor more than 1.11 times the smallest measurement taken on pipe 20 inches (508 millimeters) or more in outside diameter. *****Notes - OMM Section 2.0**	X			
50.		Design factor (F) for steel pipe. 192.111 *****Notes - OMM Section 2.0**				
51.		(a) Except as otherwise provided in paragraphs (b), (c), and (d) of this section, the design factor to be used in the design formula in §192.105 is determined in accordance with the following Class location Design factor (F) table. Class 1 **0.72**, Class 2 **0.60**, Class 3 **0.50**, Class 4 **0.40** *****Notes - OMM Section 2.0**	X			
52.		(b) A design factor of 0.60 or less must be used in the design formula in §192.105 for steel pipe in Class 1 locations that: (1) Crosses the right-of-way of an unimproved public road, without a casing; (2) Crosses without a casing, or makes a parallel encroachment on, the right-of-way of either a hard surfaced road, a highway, a public street, or a railroad; (3) Is supported by a vehicular, pedestrian, railroad, or pipeline bridge; or (4) Is used in a fabricated assembly, (including separators, mainline valve assemblies, cross-connections, and river crossing headers) or is used within five pipe diameters in any direction from the last fitting of a fabricated assembly, other than a transition piece or an elbow used in place of a pipe bend which is not associated with a fabricated assembly.			X	
53.		(c) For Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for uncased steel pipe that crosses the right-of-way of a hard surfaced road, a highway, a public street, or a railroad.			X	
54.		(d) For Class 1 and Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for- (1) Steel pipe in a compressor station, regulating station, or measuring station, and (2) Steel pipe, including a pipe riser, on a platform located offshore or in inland navigable waters.			X	
55.		Longitudinal joint factor (E) for steel pipe. 192.113 *****Notes - OMM Section 2.0**	X			
56.	480-93-180 (1)	Temperature derating factor (T) for steel pipe. 192.115 *****Notes - OMM Section 2.0**	X			
		For Plastic Pipe				
57.	480-93-180 (1)	Subject to the limitations of §192.123, for determining the design pressure for plastic pipe in accordance with either formula listed. 192.121 *****Notes - OMM Sections 2.3, 2.4**	X			
58.		For assuring that the design limitations for plastic pipe are not exceeded. 192.123 (a) thru (e) *****Notes - OMM Sections 2.3, 2.4**	X			

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Comments:

Items 52-54 – CoE has no pipeline in Class 1 or 2 locations

		SUBPART D – DESIGN OF PIPELINE COMPONENTS	S	U	N/A	N/C
		For the design and installation of pipeline components and facilities, and relating to protection against accidental over-pressuring. 192.141				
59.	480-93-180 (1)	General requirements.… 192.143 *****Notes - OMM Section 3.0**	X			
60.		Qualifying metallic components. 192.144 (a) & (b) *****Notes - OMM Section 3.0**	X			
61.		For steel valves; meeting the minimum requirements of API 6D, or other standard that provides an equivalent performance level. 192.145 (a) thru (e) *****Notes - OMM Section 3.11**	X			
62.		For each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B16.5, MSS SP-44, or the equivalent. 192.147 (a) thru (c) *****Notes - OMM Section 3.11**	X			
63.		For ensuring that each new transmission line and each replacement of line pipe, valve, fitting, or other line component in a transmission line is designed and constructed to accommodate the passage of instrumented internal inspection devices. 192.150 (a) thru (c)			X	
64.		Components fabricated by welding. 192.153 (a) thru (d) *****Notes - OMM Section 3.11**	X			
65.		Welded branch connections. 192.155 *****Notes - OMM Section 3.11**	X			
66.		Flexibility. 192.159 *****Notes - OMM Sections 3, 4**	X			
67.		Supports and Anchors 192.161(a) (a) thru (f) *****Notes - OMM Section 3.0**	X			
		Compressor Stations				
68.	480-93-180 (1)	Compressor stations: Design and construction. 192.163 (a) thru (e)			X	
69.		Compressor stations: Liquid removal. 192.165 (a) & (b)			X	
70.		Compressor stations: Emergency shutdown. 192.167 (a) thru (c)			X	
71.	480-93-180 (1)	Compressor stations: Pressure limiting devices. 192.169 (a) & (b)			X	
72.		Compressor stations: Additional safety equipment. 192.171 (a) thru (e)			X	
73.		Compressor stations: Ventilation. 192.173			X	
74.		Pipe-type and bottle-type holders. 192.175			X	
75.		Additional provisions for bottle-type holders. 192.177			X	
76.	480-93-180 (1)	Transmission line valves.192.179 (a) thru (d)			X	
77.		Distribution line valves. 192.181(a) thru (c) *****Notes - OMM Section 9.4.2**	X			
78.	480-93-180 (1)	Vaults: Structural design requirements 192.183 (a) thru (c)			X	
79.		Vaults: Accessibility 192.185 (a) thru (c)			X	
80.		Vaults: Sealing, venting, and ventilation. 192.187 (a) thru (c)			X	

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		SUBPART D – DESIGN OF PIPELINE COMPONENTS	S	U	N/A	N/C
81.	480-93-180 (1)	Vaults: Drainage and waterproofing 192.189 (a) thru (c)			X	
82.		Design pressure of plastic fittings 192.191 (a) & (b) ***Notes - OMM Section 2.5**	X			
83.		Valve installation in plastic pipe. 192.193 ***Notes - OMM Section 3.10**	X			
84.		Protection against accidental over-pressuring 192.195 (a) & (b) ***Notes - OMM Section 21.2**	X			
85.		Control of the pressure of gas delivered from high-pressure distribution systems. 192.197 (a) thru (c) ***Notes - OMM Section 21.2**	X			
86.		Except for rupture discs, each pressure relief or pressure limiting device must: 192.199 (a) thru (h) ***Notes - OMM Section 9.3**	X			
87.		Required capacity of pressure relieving and limiting stations. 192.201(c) ***Notes - OMM Section 9.3.9**	X			
88.		Instrument, Control, and Sampling Pipe and Components 192.203(a) & (b) ***Notes - OMM Section 2.2**	X			

Comments:
Item 63 – CoE has no transmission lines
Items 68-73 – CoE has no compressor stations
Items 74-75 – CoE has no pipe type or bottle type holders
Item 76 – CoE has no transmission lines
Items 78-81 – CoE has removed all vaults

		SUBPART E – WELDING OF STEEL IN PIPELINES WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION	S	U	N/A	N/C
89.	480-93-180(1)	Welding procedures must be qualified under **Section 5 of API 1104** or **Section IX of ASME Boiler and Pressure Code** (2001 ed.) by destructive test. Amdt. 192-103 pub 06/09/06, eff. 07/10/06. .225(a) ***Notes - OMM Section 5.0.4**	X			
90.		Retention of welding procedure – details and test .225(b) ***Notes - OMM Section 5.0.4**	X			
91.		Welders must be qualified by **Section 6 of API 1104 (20th edition 2007, including errata 2008)** or **Section IX of the ASME Boiler and Pressure Vessel Code** (**2007 edition, July 1, 2007**), except that a welder qualified under an earlier edition than currently listed in **192.7** may weld, but may not requalify under that earlier edition. (Amdt 192-114 Pub. 8/11/10 eff. 10/01/10). ***Notes - OMM Section 5.0.2**	X			
92.		Welders may be qualified under **section I of Appendix C** to weld on lines that operate at **< 20% SMYS.** .227(b) ***Notes - OMM Section 5**	X			
		Oxyacetylene welders may qualify under 49 CFR § 192 Appendix C, but may only weld the following size pipe: 480-93-080(1)(a)	**S**	**U**	**N/A**	**N/C**
93.	480-93-180 (1)	• Nominal **two-inch** or smaller branch connections to nominal **six-inch** or smaller main or service pipe. 480-93-080(1)(a)(i) ***Notes - OMM Section 5.0.5**	X			
94.		• Nominal **two-inch** or smaller below ground butt welds 480-93-080(1)(a)(ii) ***Notes - OMM Section 5.0.5**	X			
95.	480-93-180(1)	• Nominal **four-inch** or smaller above ground manifold and meter piping operating at 10 psig or less. 480-93-080(1)(a)(iii) ***Notes - OMM Section 5.0.5**	X			
96.		• Appendix C Welders re-qualified **2/Yr (7.5Months)** 480-93-080(1)(a)(iv)			X	
97.		Use of testing equipment to record and document essential variables 480-93-080(1)(b) (eff 6/02/05) ***Notes - OMM Section 5.0.4**	X			
98.		Qualified written welding procedures must be located on-site where welding is being performed 480-93-080(1)(d) ***Notes - OMM Section 5.0.3**	X			
99.		Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. 480-93-080(3) (eff 6/02/05) ***Notes - OMM Section 5.0.5**	X			
100.		To weld on compressor station piping and components, a welder must successfully complete a destructive test .229(a)			X	

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101.	480-93-180(1)	Welder must have used welding process within the preceding **6 months** .229(b) ***Notes - OMM Section 5.0.5**	X			
102.		A welder qualified under .227(a)… .229(c)				
103.		• May not weld on pipe that operates at ≥ 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the **sections 6 or 9 of API Standard 1104**; may maintain an ongoing qualification status by performing welds tested and found acceptable at least **twice per year**, not exceeding **7½ months**; may not requalify under an earlier referenced edition. .229(c)(1)			X	
104.		• May not weld on pipe that operates at < 20% SMYS unless is tested in accordance with .229(c)(1) or re-qualifies under .229(d)(1) or (d)(2). .229(c)(2) ***Notes - OMM Section 5.0.5**	X			
		Welders qualified under .227(b) may not weld unless: .229(d)	**S**	**U**	**N/A**	**N/C**
105.	480-93-180(1)	• Re-qualified within **1 year/15 months**, or .229(d)(1) ***Notes - OMM Section 5.0.5**	X			
106.		• Within **7½ months** but at least **twice per year** had a production weld pass a qualifying test .229(d)(2) ***Notes - OMM Section 5.0.5**	X			
107.		Welding operation must be protected from weather .231 **OMM Section 3.11.3 (F)**	X			
108.		Miter joints (**consider pipe alignment**) .233			X	
109.		Welding preparation and joint alignment .235 **OMM Section 3.11.3 OMM Section 3.11.3** (F)	X			
110.		Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure: .241(a) thru (c) **OMM Section 3.11.3 (S)**	X			
111.		Nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld .243 (a) thru (f) **OMM Section 3.11.3 (T)**	X			
112.		Repair or removal of defects.245 (a) thru (c) **OMM Section 3.11.3 (HH)**	X			
		• Sleeve Repair – low hydrogen rod (**Best Practices –ref. API 1104 App. B, In Service Welding**)				

Comments:
Items 96 – CoE has no Appendix C welders
Item 100 – CoE owns no compressor stations
Item 103 – No pipe operating over 20% SMYS
Item 108 – Not allowed by CoE

SUBPART F - JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION			**S**	**U**	**N/A**	**N/C**
113.		Joining of plastic pipe .281				
114.		A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint. 281(a) ***Notes - OMM Section 4.0.4, Appendix A**	X			
115.		Each solvent cement joint on plastic pipe must comply with the following: .281(b)			X	
116.		• The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint. .281(b)(1) ***Notes - OMM Section 4.0.4, Appendix A**			X	
117.		• The solvent cement must conform to ASTM Designation: D 2513. .281(b)(2)			X	
118.		• The joint may not be heated to accelerate the setting of the cement. .281(b)(3)			X	
119.		Each heat-fusion joint on plastic pipe must comply with the following: .281(c)				
120.		• A butt heat-fusion joint must be joined by a device that holds the heater element square to the ends of the piping, compresses the heated ends together, and holds the pipe in proper alignment while the plastic hardens. .281(c)(1) ***Notes - OMM Section 4.0.4, Appendix A**	X			

121.	480-93-180(1)	• A socket heat-fusion joint must be joined by a device that heats the mating surfaces of the joint uniformly and simultaneously to essentially the same temperature. .281(c)(2) • *****Notes - OMM Section 4.0.4, Appendix A**	X			
122.		• An electrofusion joint must be joined utilizing the equipment and techniques of the fittings manufacturer or equipment and techniques shown, by testing joints to the requirements of §192.283(a)(1)(iii), to be at least equivalent to those of the fittings manufacturer. .281(c)(3) *****Notes - OMM Section 4.0.4, Appendix A**	X			
123.		• Heat may not be applied with a torch or other open flame. .281(c)(4) *****Notes - OMM Section 4.0.4, Appendix A**	X			
124.		Each adhesive joint on plastic pipe must comply with the following: .281(d)				
125.		• The adhesive must conform to ASTM Designation: D 2517. .281(d)(1)			X	
126.		• The materials and adhesive must be compatible with each other. .281(d)(1)			X	
127.		Each compression type mechanical joint on plastic pipe must comply with the following: .281(e)				
128.		• The gasket material in the coupling must be compatible with the plastic. .281(e)(1) • *****Notes - OMM Section 4.0.4, Appendix A**	X			
129.		• A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling. .281(e)(2) *****Notes - OMM Section 4.0.4, Appendix A**	X			
130.	480-93-180(1)	Before any written procedure established under §192.273(b) is used for making plastic pipe joints by a heat fusion, solvent cement, or adhesive method, the procedure must be qualified by subjecting specimen joints made according to the procedure to the following tests: .283(a)				
131.		The burst test requirements of– .283(a)(1) *****Notes - OMM Section 4.0.4, Appendix A**				
132.		• Thermoplastic pipe: paragraph 6.6 (sustained pressure test) or paragraph 6.7 (Minimum Hydrostatic Burst Test) or paragraph 8.9 (Sustained Static pressure Test) of ASTM D2513 .283(a)(1)(i) *****Notes - OMM Section 4.0.4, Appendix A**	X			
133.		• Thermosetting plastic pipe: paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517; or .283(a)(1)(ii) • *****Notes - OMM Section 4.0.4, Appendix A**	X			
134.		• Electrofusion fittings for polyethylene pipe and tubing: paragraph 9.1 (Minimum Hydraulic Burst Pressure Test), paragraph 9.2 (Sustained Pressure Test), paragraph 9.3 (Tensile Strength Test), or paragraph 9.4 (Joint Integrity Tests) of ASTM Designation F1055. .283(a)(1)(iii) *****Notes - OMM Section 4.0.4, Appendix A**	X			
135.		For procedures intended for lateral pipe connections, subject a specimen joint made from pipe sections joined at right angles according to the procedure to a force on the lateral pipe until failure occurs in the specimen. If failure initiates outside the joint area, the procedure qualifies for use; and, .283(a)(2) *****Notes - OMM Section 4.0.4, Appendix A**	X			
136.		For procedures intended for non-lateral pipe connections, follow the tensile test requirements of ASTM D638, except that the test may be conducted at ambient temperature and humidity If the specimen elongates no less than 25 percent or failure initiates outside the joint area, the procedure qualifies for use. .283(a)(3) *****Notes - OMM Section 4.0.4, Appendix A**	X			
137.		Before any written procedure established under §192.273(b) is used for making mechanical plastic pipe joints that are designed to withstand tensile forces, the procedure must be qualified by subjecting five specimen joints made according to the procedure to the following tensile test: .283(b)				
138.		• Use an apparatus for the test as specified in ASTM D 638 (except for conditioning). .283(b)(1) *****Notes - OMM Section 4.0.4, Appendix B (Continental Service Head Adaptor)**	X			
139.	480-93-180(1)	• The specimen must be of such length that the distance between the grips of the apparatus and the end of the stiffener does not affect the joint strength. .283(b)(2) • *****Notes - OMM Section 4.0.4, Appendix B (Continental Service Head Adaptor)**	X			
140.		• The speed of testing is 0.20 in. (5.0 mm) per minute, plus or minus 25 percent. .283(b)(3) *****Notes - OMM Section 4.0.4, Appendix B (Continental Service Head Adaptor)**	X			
141.		• Pipe specimens less than 4 inches (102 mm) in diameter are qualified if the pipe yields to an elongation of no less than 25 percent or failure initiates outside the joint area.	X			

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		.283(b)(4) *****Notes - OMM Section 4.0.4, Appendix B (Continental Service Head Adaptor)**				
142.		• Pipe specimens 4 inches (102 mm) and larger in diameter shall be pulled until the pipe is subjected to a tensile stress equal to or greater than the maximum thermal stress that would be produced by a temperature change of 100° F (38° C) or until the pipe is pulled from the fitting. If the pipe pulls from the fitting, the lowest value of the five test results or the manufacturer's rating, whichever is lower must be used in the design calculations for stress. .283(b)(5) *****Notes - OMM Section 4.0.4, Appendix B (Continental Service Head Adaptor)**	X			
143.		• Each specimen that fails at the grips must be retested using new pipe. .283(b)(6) • *****Notes - OMM Section 4.0.4, Appendix B (Continental Service Head Adaptor)**	X			
144.		• Results pertain only to the specific outside diameter, and material of the pipe tested, except that testing of a heavier wall pipe may be used to qualify pipe of the same material but with a lesser wall thickness. .283(b)(7) • *****Notes - OMM Section 4.0.4, Appendix B (Continental Service Head Adaptor)**	X			
145.		A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints. .283(c) *****Notes - OMM Section 4.0.4**	X			
146.		Pipe or fittings manufactured before July 1, 1980, may be used in accordance with procedures that the manufacturer certifies will produce a joint as strong as the pipe. .283(d)	X			
147.		No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by: .285(a)				
148.		• Appropriate training or experience in the use of the procedure; and .285(a)(1) *****Notes - OMM Section 4.0.5**	X			
149.		• Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section. .285(a)(2) *****Notes - OMM Section 4.0.5**	X			
150.	480-93-180(1)	The specimen joint must be: .285(b)				
151.		• Visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure; and .285(b)(1) *****Notes - OMM Section 4.0.5**	X			
152.		• In the case of a heat fusion, solvent cement, or adhesive joint; .285(b)(2) *****Notes - OMM Section 4.0.5**	X			
153.		Tested under any one of the test methods listed under §192.283(a) applicable to the type of joint and material being tested; .285(b)(2)(i) *****Notes - OMM Section 4.0.5**	X			
154.	480-93-180(1)	Examined by ultrasonic inspection and found not to contain flaws that may cause failure; or .285(b)(2)(ii)			X	
155.		Cut into at least three longitudinal straps, each of which is: .285(b)(2)(iii) *****Notes - OMM Section 4.0.5**	X			
156.		Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and .285(b)(2)(iii)(A) *****Notes - OMM Section 4.0.5**	X			
157.		Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area. .285(b)(2)(iii)(B) *****Notes - OMM Section 4.0.5**	X			
158.		A person must be requalified under an applicable procedure, if during any 12-month period that person: .285(c)				
159.		• Does not make any joints under that procedure; or .285(c)(1) *****Notes - OMM Section 4.0.5**	X			
160.	480-93-180(1)	• Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513. .285(c)(2) *****Notes - OMM Section 4.0.5**	X			
161.		Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section. .285(d) *****Notes - OMM Section 4.0.5**	X			
		Plastic pipe joiners re-qualified **1/Yr (15 Months)** 480-93-080 (2)				

162.	480-93-180(1)	• Qualified written plastic joining procedures must be located on-site where plastic joining is being performed. 480-93-080(2)(a) *****Notes - OMM Section 4.0.4**	X			
163.		• Plastic pipe joiners re-qualified if no production joints made during any 12 month period 480-93-080(2)(b) (eff 6/02/05) *****Notes - OMM Section 4.0.5**	X			
164.		• Tracking production joints or re-qualify joiners **1/Yr (12Months)** 480-93-080(2)(c) (eff 6/02/05) *****Notes - OMM Section 4.0.4**	X			
165.	480-93-180(1) / 192.273(b)	No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure. .287 *****Notes - OMM Section 4.0.5**	X			

Comments:
Items 115-119 – CoE does not use solvent cements for joining pipe
Items 124-126 – CoE does not use adhesive joints for joining pipe
Items 137-144 – CoE uses manufacturer's recommendations
Item 154 – CoE does not do this

SUBPART G – CONSTRUCTION REQUIREMENTS for TRANSMISSION LINES and MAINS			**S**	**U**	**N/A**	**N/C**
166.	480-93-180(1)	Compliance with specifications or standards. 192.303 *****Notes - OMM Sections 4,5**	X			
167.		Inspection of each transmission line and main during construction 192.305 *****Notes - OMM Sections 4,5**	X			
168.		Inspection of materials 192.307 *****Notes - OMM Section 2**	X			
169.		Repair of steel pipe 192.309 (a) thru (e) *****Notes - OMM Section 10.2.5**	X			
170.		Repair of plastic pipe. 192.311 *****Notes - OMM Section 10.2.4**	X			
171.		Bends and elbows. 192.313 (a) thru (c)	X			
172.		Wrinkle bends in steel pipe. 192.315 (a) & (b)			X	
173.		Protection from hazards 192.317 (a) thru (c) *****Notes - OMM Section 18**	X			
174.		Installation of Pipe in a ditch 192.319 (a) thru (c) *****Notes - OMM Section 3**	X			
175.		Installation of plastic pipe. 192.321 (a) thru (h) *****Notes - OMM Section 3.10**	X			
480-93-178 WAC PROTECTION OF PLASTIC PIPE			**S**	**U**	**N/A**	**N/C**
176.	480-93-180(1)	Procedures for the storage, handling, and installation of plastic pipelines in accordance with the latest applicable manufacturer's recommended practices. 480-93-178(1) *****Notes - OMM Section 3**	X			
177.		Stated acceptable time limit for maximum cumulative ultraviolet light exposure 480-93-178 (2) *****Notes - OMM Sections 2.3**	X			
178.		Separation requirements when installing plastic pipelines parallel to other underground utilities 480-93-178 (4) *****Notes - OMM Section 3.4**	X			
179.		Separation requirements when installing plastic pipelines perpendicular to other underground utilities 480-93-178 (5) *****Notes - OMM Section 3.4**	X			
180.		Casings 192.323 (a) thru (d) *****Notes - OMM Section 12.5**	X			
181.		Casing of pipelines. 480-93-115 (1) thru (4) *****Notes - OMM Section 12.5**	X			
182.		Underground clearance. 192.325 (a) thru (d). *****Notes - OMM Section 3.4**	X			
183.		Cover. 192.327 (a) thru (g) *****Notes - OMM Section 3.4**	X			

Comments:

Item 172 – CoE does not allow wrinkle bends

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SUBPART H - CUSTOMER METERS, SERVICE REGULATORS, and SERVICE LINES						
			S	**U**	**N/A**	**N/C**
184.		Meters and service regulators installed at locations as prescribed under 192.353 (a) thru (d) *****Notes - OMM Section 21.3.1**	X			
185.	480-93-180 (1)	Service regulator vents and relief vents installed and protected from damage. Vaults housing meters and regulators protected from loading due to vehicular traffic. 192.355 (a) thru (c) *****Notes - OMM Section 21.3.2**	X			
186.	480-93-180 (1)	Meters and regulators installed to minimize stresses and insure that potential releases vent to outside atmosphere. 192.357 (a) thru (d) *****Notes - OMM Section 21.3.3**	X			
480-93-140 WAC SERVICE REGULATORS			**S**	**U**	**N/A**	**N/C**
187.	480-93-180 (1)	Procedures for installing, operating, and maintaining service regulators in accordance with federal and state regulations, and manufacturer's recommended installation and maintenance practices. 480-93-140(1) *****Notes - OMM Section 21.3.1**	X			
188.		Procedures for inspecting and testing service regulators and associated safety devices during the initial turn-on, and when a customer experiences a pressure problem. Testing must include….. 480-93-140(2) *****Notes - OMM Section 21.3.1**	X			
189.	480-93-180 (1)	Minimum service line installation requirements as prescribed under 192.361 (a) thru (g) *****Notes - OMM Section 21.2**	X			
190.		Location of service-line valves as prescribed under 192.365 (a) thru (c) *****Notes - OMM Section 21.4**	X			
191.		General requirements for locations of service-line connections to mains and use of compression fittings 192.367 (a) thru (b)(2) *****Notes - OMM Section 21.2**	X			
192.		Connections of service lines to cast iron or ductile iron mains. 192.369 (a) thru (b)			X	
193.		Provisions for new service lines not in use 192.379 (a) thru (c) *****Notes - OMM Section 21.6**	X			
194.		EFV performance requirements §192.381 (a) thru (e) *****Notes - OMM Section 21.5**	X			
195.		Excess flow valves, does the program must meet the requirements outlined in §192.38? *****Notes - OMM Section 21.5**	X			
196.		Customer notification in accordance with §192.383. *****Notes - OMM Section 21.2**	X			

Comments:

Item 192 – CoE has no cast/ductile iron

SUBPART I - CORROSION CONTROL			**S**	**U**	**N/A**	**N/C**
197.	480-93-180(1)	Corrosion procedures established for the Design, Operations, Installation & Maintenance of CP systems, carried out by, or under the direction of, a person qualified in pipeline corrosion control methods .453 *****Notes - OMM Section 12.4**	X			
198.		Written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. 480-93-110(4) *****Notes - OMM Section 12 (Appendix A)**	X			
199.		Recording the condition of all underground metallic facilities each time the facilities are exposed. 480-93-110(6) *****Notes - OMM Section 12, Procedure CP-1**	X			
200.		CP test reading on all exposed facilities where coating has been removed 480-93-110(8) (eff 6/02/05) *****Notes - OMM Section 12, Procedure CP-1**	X			

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		SUBPART I - CORROSION CONTROL	S	U	N/A	N/C
201.	480-93-180(1)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) 480-93-110(2) *****Notes - OMM Section 12.4**	X			
202.		Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas (**1 per 3 years/39 months**) .465(e)			X	
203.		Written program to monitor for indications of internal corrosion. The program must also have remedial action requirements for areas where internal corrosion is detected. 480-93-110(7) (eff 6/02/05) *****Notes - OMM Section 12, Procedure CP-1**	X			
204.		Written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action. 480-93-110(9) (eff 6/02/05) *****Notes - OMM Section 12, Procedure CP-2**	X			
205.		Remedial measures (cast iron and ductile iron pipelines) .489			X	
206.		Records retained for <u>each</u> cathodic protection test, survey, or inspection required by 49 CFR Subpart I, and chapter 480-93 WAC. 480-93-110 *****Notes - OMM Section 12.4**	X			
		WAC 480-93-110 Corrosion Requirements	**S**	**U**	**N/A**	**N/C**
207.	480-93-180(1)	Casings inspected/tested annually not to exceed **fifteen months** 480-93-110(5) *****Notes - OMM Section 12.7**	X			
208.		Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods 480-93-110(5)(a)			X	
209.		Possible shorted conditions – Perform confirmatory follow-up inspection within **90** days 480-93-110(5)(b) *****Notes - OMM Section 12.6 (F)**	X			
210.		Casing shorts cleared when practical 480-93-110(5)(c) *****Notes - OMM Section 12.6 (F)**	X			
211.	480-93-180(1)	Shorted conditions leak surveyed within 90 days of discovery. **Twice annually/7.5 months** 480-93-110(5)(d) *****Notes - OMM Section 12.6 (F)**	X			
212.		CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched) 480-93-110(3) *****Notes - OMM Section 25**	X			

Comments:
Item 202 – CoE has no bare/unprotected lines
Item 205 – CoE has no cast/ductile iron
Item 208 – CoE has test leads on all casings

		SUBPART J – TEST REQUIREMENTS	S	U	N/A	N/C
213.	480-93-180(1)	Procedures to ensure that the provisions found under 192.503(a) thru (d) for new segments of pipeline, or Return to Service segments of pipeline which have been relocated or replaced are met. *****Notes - OMM Section 6**	X			
214.		Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS. 192.505 (a) thru (e)			X	
215.		Test requirements for pipelines to operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig. 192.507 (a) thru (c)			X	
216.		Test requirements for pipelines to operate below 100 psig. 192.509 (a) & (b) *****Notes - OMM Section 6.4**	X			
217.		Test requirements for service lines. 192.511 (a) thru (c) *****Notes - OMM Section 6.4**	X			
218.		Test requirements for plastic pipelines. 192.513 (a) thru (d) *****Notes - OMM Sections 6.2, 6.4**	X			
219.		Environmental protection and safety requirements. 192.515 (a) & (b) *****Notes - OMM Section 6.2**	X			
220.		Records 192.517 Refer also to 480-93-170 (7) (a-h) below. *****Notes - OMM Section 6.2**	X			

Comments:

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Items 214-215 – CoE does not operate over 30 percent SMYS

		WAC 480-93-170 PRESSURE TEST PROCEDURES	S	U	N/A	N/C
221.	480-93-180(1)	Notification in writing, to the commission, at least two business days prior to any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the SMYS 480-93-170(1)			X	
222.		• In Class 3 or Class 4 locations, as defined in 49 CFR § 192.5, or within one hundred yards of a building, must be at least eight hours in duration. 480-93-170(1)(a)			X	
223.		• When the test medium is to be a gas or compressible fluid, each operator must notify the appropriate public officials so that adequate public protection can be provided for during the test. 480-93-170(1)(b)			X	
224.		• In an emergency situation where it is necessary to maintain continuity of service, the requirements of subsection (1) of this section and subsection (1)(a) may be waived by notifying the commission by telephone prior to performing the test. 480-93-170(1)(c)			X	
225.		Minimum test pressure for any steel service line or main, must be determined by multiplying the intended MAOP by a factor determined in accordance with the table located in 49 CFR § 192.619 (a)(2)(ii). 480-93-170(2) *****Notes - OMM Section 6.3 (Class 4)**	X			
226.	480-93-180(1)	Re-testing of service lines broken, pulled, or damaged, resulting in the interruption of gas supply to the customer, must be pressure tested from the point of damage to the service termination valve prior to being placed back into service. 480-93-170(4) *****Notes - OMM Section 10.1.6**	X			
227.		Maintain records of all pressure tests performed for the life of the pipeline and document information as listed under 480-93-170(7) (a-h). *****Notes - OMM Section 6.2**	X			
228.		Maintain records of each test where multiple pressure tests are performed on a single installation. 480-93-170(9) *****Notes - OMM Section 6.2**	X			
229.		Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations.480-93-170(10) *****Notes - OMM Section 25**	X			
230.		• When there are no manufacturer's recommendations, then tested at an appropriate schedule determined by the operator. *****Notes - OMM Section 25.7**	X			
231.		• Test equipment must be tagged with the calibration or accuracy check expiration date. *****Notes - OMM Section 625.6**	X			

Comments:

Items 221-225 – CoE has no pipelines with an MAOP ≥20 percent SMYS

		SUBPART K - UPRATING				
		Provisions for meeting the minimum requirements for increasing maximum allowable operating pressure (uprating) for pipelines.	**S**	**U**	**N/A**	**N/C**
232.	480-93-180(1)	General requirements. 192.553 (a) thru (d)			X	
233.		Uprating to a pressure that will produce a hoop stress of **30 % or more** of SMYS in steel pipelines. 192.555 (a) thru (e)			X	
234.		Uprating: Steel pipelines to a pressure that will produce a hoop stress **less than 30 %** of SMYS: (plastic, iron, and ductile iron pipelines.) 192.557 (a) thru (d)			X	
		WAC 480-93-155 - UPRATING				
235.		Notification of uprate and submission of written plan 480-93-155 (1)			X	
236.		Content of written plan… 480-93-155 (1) (a) thru (j)			X	

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SUBPART K - UPRATING							
237.	480-93-180(1)	Uprates must be based on a previous or current pressure test that will substantiate the intended MAOP. 480-93-155 (2)			X	

Comments:

Items 232-237 – CoE has defined uprating as a non-routine procedure (NRP). Should uprating be required, an NRP will be written following the appropriate procedures.

SUBPART L - OPERATIONS			S	U	N/A	N/C
238.	480-93-180(1) / 192.605(a)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) 192.605(a) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09 ***Notes - OMM Section 1.0	X			
239.		Availability of construction records, maps, operating history to operating personnel 192.605(b)(3) ***Notes - OMM Section 1.2.3	X			

Comments:

SUBPART – L DAMAGE PREVENTION PROGRAM PROCEDURES			S	U	N/A	N/C
240.		**Damage Prevention (Operator Internal Performance Measures)**	**S**	**U**	**N/A**	**N/C**
241.		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, Best Practice 4-18. Recommended only, not required)			X	
242.		Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?			X	
243.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?			X	
244.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? ***Notes - OMM Section 13.2.15	X			
245.		Review operator locating and excavation procedures for compliance with state law and regulations. ***Notes - OMM Section 1.0 (D)	X			
246.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ***Notes - OMM Section 14.14	X			
247.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? ***Notes - OMM Section 13 (Appendix A)	X			
248.		**Informational purposes only. Not Required.** Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do **Y** X **N**	X			

249.		**PHMSA Areas of Emphasis:** • Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies? *****Notes - OMM Section 14.4**	X			
250.		• Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of reaccurence? *****Notes - OMM Section 14.5**	X			

Comments:

Items 240-243 – Optional items

		SUBPART – L FAILURE INVESTIGATION PROCEDURES	**S**	**U**	**N/A**	**N/C**
251.	480-93-180(1) / 192.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 *****Notes - OMM Section 16**	X			

Comments:

		WAC 480-93-015 ODORIZATION PROCEDURES	**S**	**U**	**N/A**	**N/C**
252.		Use of odorant testing instrumentation/Monthly testing interval 480-93-015 (2) *****Notes - OMM Section 8.9.4**	X			
253.		Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) 480-93-015 (3) *****Notes - OMM Section 8.9.4**	X			
254.	480-93-180(1)	Records maintained for usage, odorant tests performed and equipment calibration (**5yrs**) 480-93-015(4) *****Notes - OMM Section 8.9.4**	X			

Comments:

		SUBPART – L PIPELINE PURGING PROCEDURES	**S**	**U**	**N/A**	**N/C**
255.	480-93-180(1)	(a) Lines containing **air** must be properly purged. *****Notes - OMM Section 7.2**	X			
256.	480-93-180(1)	(b) Lines containing **gas** must be properly purged *****Notes - OMM Section 7.2**	X			

Comments:

Utilities and Transportation Commission
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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.

	CONTROL ROOM MANAGEMENT PROCEDURES (Amdt. 192-112, 74 FR 63310, December 3, 2009, eff. 2/1/2010)	**S**	**U**	**N/A**	**N/C**
*					

		WAC 480-93-185 GAS LEAK INVESTIGATION	**S**	**U**	**N/A**	**N/C**
		Procedures for the prompt investigation of any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities.				
257.	480-93-180(1)	• received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public 480-93-185(1) *****Notes - OMM Section 10.1**	X			
258.	480-93-180(1)	• Grade leak in accordance with WAC 480-93-186, and take appropriate action 480-93-185(1) *****Notes - OMM Section 10.1.5**	X			
259.	480-93-180(1)	• retain the leak investigation record for the life of the pipeline. 480-93-185(1)	X			
260.	480-93-180(1)	Prevent removal of any suspected gas facility until the commission or the lead investigative authority has designated the release of the gas facility and keep the facility intact until directed by the lead investigative authority 480-93-185(2) *****Notes - OMM Section 16.1**	X			
261.	480-93-180(1)	Taking appropriate action when leak indications originating from a foreign source. Notification requirements. 480-93-185(3) *****Notes - OMM Section 10.1.5**	X			

		WAC 480-93-186 LEAK EVALUATION	**S**	**U**	**N/A**	**N/C**
262.	480-93-180(1)	Grade leaks as defined in WAC 480-93-18601 to establish the leak repair priority. 480-93-186(1) *****Notes - OMM Section 10.1.5**	X			
263.	480-93-180(1)	Procedure for evaluating the concentration and extent of gas leakage 480-93-186(2) **Note:** Including third-party damage where there is a possibility of multiple leaks and underground migration into nearby buildings. *****Notes - OMM Section 10.1.5**	X			
264.	480-93-180(1)	Use of a combustible gas indicator to check the perimeter of a leak area. Follow-up inspection on repaired leaks no later than thirty days following repair. 480-93-186(3) *****Notes - OMM Section 10.1.5**	X			
265.	480-93-180(1)	Grade 1 and 2 leaks downgraded once to Grade 3 leak without a physical repair. After downgrade, repair must be made not to exceed twenty-one months 480-93-186(4) *****Notes - OMM Section 10.1.5**	X			

Comments:

		WAC 480-93-187 GAS LEAK RECORDS	**S**	**U**	**N/A**	**N/C**
		Gas leak records must contain, at a minimum, the criteria outlined in 480-93-187 (1-13)				
266.	480-93-180(1)	1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the employee(s) conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron); (8) Pipe condition; (9) Type of repair; (10) Leak cause;	X			

		(11) Date pipe installed (if known); (12) Magnitude and location of CGI readings left; and (13) Unique identification numbers (such as serial numbers) of leak detection equipment. *****Notes - OMM Section 10.1.5 (F)**				

Comments:

	WAC 480-93-188 GAS LEAK SURVEYS		**S**	**U**	**N/A**	**N/C**
267.	480-93-180(1)	gas leak surveys using a gas detection instrument covering areas listed in 480-93-188(1)(a-e) *****Notes - OMM Section 9.2.2**	X			
268.		Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) 480-93-188(2) *****Notes - OMM Section 9.2.7**	X			
269.		Surveys conducted according to the minimum frequencies outlined under 480-93-188(3)(a-d) *****Notes - OMM Section 9.2.2**	X			
270.		Surveys conducted under the following circumstances outlined under 480-93-188(4)(a-e) *****Notes - OMM Section 9.2.8**	X			
271.		Survey records must be kept for a minimum of five years and contain information required under 480-93-188(5)(a-f) *****Notes - OMM Section 9.2.10**	X			
272.		Self audits as necessary, but not to exceed three years between audits and meet the criteria outlined under 480-93-188(6)(a-e) *****Notes - OMM Section 10.1.9**	X			

Comments:

	SUBPART - M VALVE AND VAULT MAINTENANCE PROCEDURES		**S**	**U**	**N/A**	**N/C**
		Service Valves	**S**	**U**	**N/A**	**N/C**
273.	480-93-180(1) / 192.605 (b)	Written service valve installation and maintenance program detailing the valve selection process, inspection, maintenance, and operating procedures. Does the program consider the criteria listed under 480-93-100(2)(a-f)? *****Notes - OMM Section 9.4**	X			
274.		Service valve maintenance **(1 per yr/15 months)** 480-93-100(3) *****Notes - OMM Section 9.4**	X			
275.		Service valve installation and maintenance program fully implemented by 6/01/07**?** 480-93-100(6)	X			
		Vaults				

Comments:

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SUBPART N — QUALIFICATION of PIPELINE PERSONNEL			S	U	N/A	N/C
Date of last UTC staff OQ plan review July 24, 2019						
276.	480-93-180(1)	Have "New Construction" activities been identified and included in the operator's covered task list? 480-93-013 *****Notes - OMM Section 13.2 (Appendix A)**	X			

Comments:

FILING REQUIREMENTS for DESIGN, SPECIFICATION, and CONSTRUCTION			S	U	N/A	N/C
277.	480-93-180(1)	Submittal of construction procedures, designs, and specifications used for each pipeline facility prior to operating the pipeline. All procedures must detail the acceptable types of materials, fittings, and components for the different types of facilities in the operator's system. 480-93-017(1) *****Notes - OMM Section 1.2.14**	X			
278.	480-93-180(1)	Construction plans not conforming with a gas company's existing and accepted construction procedures, designs, and specifications on file with the commission, submitted to the commission for review at least forty-five days prior to the initiation of construction activity. 480-93-017(2) *****Notes - OMM Section 1.2.14**	X			

MAPS, DRAWINGS, and RECORDS of GAS FACILITIES			S	U	N/A	N/C
279.	480-93-180(1)	Records updated no later then **6 months** from completion of construction activity and made available to appropriate personnel. 480-93-018(3) *****Notes - OMM Section 1.2.4**	X			

PROXIMITY CONSIDERATIONS			S	U	N/A	N/C
280.	480-93-180(1)	Each operator must submit a written request and receive commission approval prior to: Operating any gas pipeline facility at greater than five hundred psig that is within five hundred feet of any of the following places: 480-93-20 (1)(a) • A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or : 480-93-20 (1)(a)(i) • A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission; or : 480-93-20(1)(a)(ii) • A public highway, as defined in RCW 81.80.010(3). 480-93-20 (1)(a)(iii)			X	
281.	480-93-180(1)	Operating any gas pipeline facility at greater than two hundred fifty psig, up to and including five hundred psig, that is operated within one hundred feet of either of the following places: 480-93-20(1)(b) • A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or: 480-93-20(1)(b)(i) • A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission. 480-93-20(1)(b)(ii) For proposed new construction, document evidence to demonstrate that it is not practical to select an alternate route that will avoid areas or which demonstrates that the operator has considered future development of the area and has designed their pipeline facilities accordingly. 480-93-20(2)			X	

Comments:
Item 280-281 – CoE has no pipelines that will operate over 250/500 psig

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Attachment 1
Alternative Maximum Allowable Operating Pressure

For additional guidance refer to http://primis.phmsa.dot.gov/maop/faqs.htm
For FAQs refer to http://primis.phmsa.dot.gov/maop/faqs.htm

Recent PHMSA Advisory Bulletins (Last 2 years)

Number	Date	Subject
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