

utc-9183

Hi, Scott Rukke

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**FORM V: Gas OM/Procedures**

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UTC O&M/Procedures Inspection Report  
Intrastate GAS  
FORM V Gas OM/Procedures: State-Specific Requirements

**\*\* THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE PROCEDURES" MODULE IN THE MOST CURRENT WA-SPECIFIC GD QUESTION SET**

PRINT Form (select "save and keep working" first)

PHMSA Advisory Bulletins

**Inspector and Operator Information**

Inspection ID	Inspection Link	Inspector - Lead	Inspector - Assist
8258	<a href="#">8258</a>	Rukke, Scott	
Operator	Unit	Records Location - City & State	
Cascade Natural Gas Co.	Headquarters	Kennewick, WA	
Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date	
01-25-2021	01-27-2021	02-02-2021	

You must include the following in your inspection summary:

- \* Inspection Scope and Summary
- \* Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

**Inspection No. 8258**

This is a comprehensive Operations and Maintenance Procedures Manual review. Conducted in CNG's Kennewick headquarters.

**AFOD days**

1/25-1/27 = 3

**ISSUES**

No issues identified

Contacts for this inspection:

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Records location:

8113 W Grandridge Blvd, Kennewick, WA 99336

**Instructions and Ratings Definitions**

**INSTRUCTIONS**

**INSPECTION RESULTS**

S - Satisfactory	Satisfactory Responses	Satisfactory List	Unanswered Questions	Unanswered Questions List
	36	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31,32,33,34,35,36,	0	
U - Unsatisfactory	Unsatisfactory Responses	Unsatisfactory List		
	0			
Area Of Concern	Area of Concern Responses	Area of Concern List		
	0			

N/A- Not Applicable (does not apply to this operator or system)	Not Applicable Responses	Not Applicable List 37
	1	

N/C - Not Checked/Evaluated (was not inspected during this inspection)	Not Checked / Evaluated Responses	Not Checked / Evaluated List
	0	

**\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the "PROCEDURES: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.**

## INTRASTATE GAS OPERATOR PROCEDURES

### MAPPING PROCEDURES

#### Question 1

Do procedures require accurate maps (or updates) of pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

#### Q1 Reference

RCW 81.88.080

#### Q1 Result

Satisfactory

#### Q1 Notes

OPS 10 section 16.1

#### Question 2

Do procedures require that NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

#### Q2 Reference

PHMSA ADB 08-07

#### Q2 Result

Satisfactory

#### Q2 Notes

OPS 10 section 6.1

### REPORTING PROCEDURES

#### Question 3

Do procedures specify that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?

#### Q3 Reference

WAC 480-93-018(5)

#### Q3 Result

Satisfactory

#### Q3 Notes

CP 870.041

#### Question 4

Do procedures require the submission of an annual report (Due March 15 for the preceeding calendar year) on construction defects and material failures that resulted in leaks?

#### Q4 Reference

WAC 480-93-200(10)(b)

#### Q4 Result

Satisfactory

#### Q4 Notes

OPS 10 section 3.1 and 3.3

#### Question 5

Do procedures require the operator to submit updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities? Do the procedures require immediate notification to the commission and municipal authorities if an emergency point of contact changes?

#### Q5 Reference

WAC 480-93-200(11)

#### Q5 Result

Satisfactory

## Q5 Notes

OPS 10 section 7

## Question 6

Do procedures require submission of a written report, within 5 days of completion of the failure analysis of any incident or hazardous condition due to construction defects or material failures?

## Q6 Reference

WAC 480-93-200(6)

## Q6 Result

Satisfactory

## Q6 Notes

CP 722 section 8.9

## Question 7

Do procedures describe the process for damage reporting requirements outlined in RCW 19.122.053(3) and WAC 480-93-200 (7), (8) and (9)?

## Q7 Reference

RCW 19.122.053

## Q7 Reference 2

WAC 480-93-200(7) (8) and (9)

## Q7 Result

Satisfactory

## Q7 Notes

CP 835 section 8.4.6.1.2

## Question 8

Do procedures require that the operator file with the commission, not later than March 15 of each year, applicable to the preceding calendar year: copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety

## Q8 Reference

WAC 480-93-200(10)

## Q8 Result

Satisfactory

## Q8 Notes

OPS 10 section 2.1

## DAMAGE PREVENTION PROCEDURES

## Question 9

Are operator's locating and excavation procedures in compliance with all RCW 19.122 requirements for facility operators?

## Q9 Reference

RCW 19.122

## Q9 Result

Satisfactory

## Q9 Notes

## CP 836 section 4

CP 836 8.5 marking

## Question 10

Do the procedures require that the operator provide the following information to excavators who damage pipeline facilities? Notification requirements for excavators under RCW 19.122.050(1) A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 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.

## Q10 Reference

RCW 19.122

## Q10 Reference 2

WAC 480-93-200(8)

## Q10 Result

Satisfactory

## Q10 Notes

CP 835 8.4.6.1 and .2 and .3

## Question 11

Do the procedures outline a process by which the operator reports to the commission when the operator or its contractor observes or becomes aware of any 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; A person intentionally damages or removes marks indicating the location or presence of pipeline facilities.

## Q11 Reference

RCW 19.122

## Q11 Result

Satisfactory

## Q11 Notes

CP 835 section 8.4.7.1 and .2

## Question 12

Do procedures include the use of a quality assurance program for monitoring the locating and marking of facilities? Does the procedure require regular field audits of the performance of locators/contractors and implementing appropriate corrective action when necessary?

## Q12 Reference

PHMSA State Program Question

## Q12 Result

Satisfactory

## Q12 Notes

CP 799 section 8.4.5 for company personnel

As a note, CNG does all locating with CNG employees. No contractors are used.

## Question 13

Do procedures outline a process by which locator and excavator personnel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

## Q13 Reference

WAC 480-93-013

## Q13 Result

Satisfactory

## Q13 Notes

CP 836 section 4.

CNG's OQ program qualifies locators. All locating is done by CNG personnel.

## Question 14

Does the operator have sufficiently detailed directional drilling/boring procedures which include taking actions necessary to protect their facilities from dangers posed by drilling/other trenchless technologies?

## Q14 Reference

PHMSA State Programs Emphasis

## Q14 Result

Satisfactory

## Q14 Notes

OPS 322 section 1.1.2

## Question 15

Does the operator have a sufficiently detailed procedure to review records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

## Q15 Reference

PHMSA State Programs Emphasis

## Q15 Result

Satisfactory

## Q15 Notes

CP 835 section 8.4.4 requires all damaged facilities to be investigated and documented and 8.5.6.1 (DIRT)

## DESIGN/CONSTRUCTION PROCEDURES

## Question 16

Does the operator have sufficiently detailed procedures to ensure materials meet minimum requirements prescribed for the selection and qualification of pipe and components for use in all of their facilities, as described in Part 192, Subpart B? See 192.51, 192.55(Steel), 192.59(Plastic)

## Q16 Reference

Part 192, Subpart B

## Q16 Result

Satisfactory

## Q16 Notes

CP 601 section 8.2

## Question 17

Does the operator have sufficiently detailed procedures to assure that they are meeting minimum requirements for design of their pipeline systems in accordance with Part 192, Subpart C? Are the procedures consistent with the requirements in parts 192.103, 192.105 for steel and parts 192.121 and 192.123 for plastic?

## Q17 Reference

Part 192, Subpart C

## Q17 Result

Satisfactory

**Q17 Notes**

CP 601 section 8.2

**Question 18**

Does the operator have sufficiently detailed procedures to ensure that notice of proposed new construction, or replacement of existing gas transmission lines greater than 100 feet in length is provided in a complete and timely manner in accordance with WAC 480-93-160?

**Q18 Reference**

WAC 480-93-160

**Q18 Result**

Satisfactory

**Q18 Notes**

OPS 10 section 12.1

**Question 19**

Does the operator have a sufficiently detailed procedure that ensures each new transmission line and each replacement of line pipe, valve, fitting, or other line component of a transmission line is designed and constructed to accommodate the passage of instrumented internal inspection devices?

**Q19 Reference**

WAC 480-93-180

**Q19 Result**

Satisfactory

**Q19 Notes**

CP 601 section 8.21

**Question 20**

Does the operator have sufficiently detailed procedures that account for all Part 192, Subpart D requirements for design of pipeline components?

**Q20 Reference**

Part 192, Subpart D

**Q20 Result**

Satisfactory

**Q20 Notes**

CNG's CP 601 covers design of pipe and pipeline components.

It appears adequate to cover the facilities in CNG's system.

Not all of Subpart D was evaluated as it is comprehensive and much of it was covered in portions of the IA question set.

**Question 21**

Does the operator's welding procedures account for all requirements specified in WAC 480-93-080 and all applicable Part 192, Subpart E requirements?

**Q21 Reference**

WAC 480-93-080

**Q21 Reference 2**

Part 192, Subpart E

**Q21 Result**

Satisfactory

**Q21 Notes**

CNG's CP 760 covers welding procedures which are comprehensive in nature.

It appears adequate to cover all of the welding requirements in code. CNG is 100% API 1104.

Not all of Subpart E was evaluated as it is comprehensive and much of it was covered in portions of the IA question set. CNG is currently undergoing a comprehensive procedure manual merge with MDU manuals.

**Question 22**

Does the operator have a sufficiently detailed procedure that requires plastic pipe joiners to be re-qualified within 1 year/NTE 15months? Are procedures required to be located on site where plastic joining is performed? Does the procedure require plastic pipe joiners to re-qualify if no joints made during any 12 month period? Does the procedure specify the process the operator uses to track production joints or re-qualify joiners within the annual requirement?

**Q22 Reference**

WAC 480-93-080(2)

**Q22 Result**

Satisfactory

**Q22 Notes**

CP 607 section 8.23.1

**Question 23**

Does the operator have sufficiently detailed procedures to ensure compliance with construction requirements for transmission lines and mains in accordance with Part 192, Subpart G?

**Q23 Reference****Q23 Result**

Satisfactory

Part 192, Subpart G

**Q23 Notes**

CP 601

CNG's CP 601 covers construction requirements.

It appears adequate to cover the construction of facilities in CNG's system.

Not all of Subpart G was evaluated as it is comprehensive and much of it was covered in portions of the IA question set. CNG is currently undergoing a major procedures manual modification as they merge their manual with MDU procedures.

**Question 24**

Does the operator have sufficiently detailed procedures to ensure protection of plastic pipe in accordance with WAC 480-93-178?

**Q24 Reference****Q24 Result**

Satisfactory

WAC 480-93-178

**Q24 Notes**

OPS 11 section 1

**Question 25**

Does the operator's procedure ensure the siting, installation, testing and maintenance of service regulators is in compliance with WAC 480-93-140 and Part 192, Subpart H?

**Q25 Reference****Q25 Reference 2****Q25 Result**

Satisfactory

WAC 480-93-140

Part 192, Subpart H

**Q25 Notes**

CP 685 section 8.6.1

CP 683 section 8.6.1.2 flow and lock up pressures

**CORROSION CONTROL PROCEDURES****Question 26**

Do the operator's cathodic protection procedures contain sufficient detail to explain how CP-related surveys, reads, and tests will be conducted in accordance with WAC 480-93-110? Do procedures include recording the condition of all underground metallic facilities each time the facility is exposed? Does the procedure require CP test reads on all exposed facilities where the coating has been removed?

**Q26 Reference****Q26 Result**

Satisfactory

WAC 480-93-110

**Q26 Notes**

CP 755 section 8.3.5 - requirement to take a CP read when the coating is removed

Other CP requirements were addressed in IA and earlier questions.

**Question 27**

Does the operator have a sufficiently detailed written program for monitoring atmospheric corrosion, with required timeframes for completing remedial action? Does the operator have a written program to monitor for indications of internal corrosion? Does the IC program contain remedial action requirements for areas where IC is detected?

**Q27 Reference****Q27 Result**

Satisfactory

WAC 480-93-110

**Q27 Notes**

CP 754

**Question 28**

Do the operator's corrosion control procedures specify the testing intervals for casings (NTE 15 months), confirmatory follow-up on shorted casings within 90 days of discovery, leak surveys of shorted casings (NTE 7.5 months) and test equipment accuracy checks in accordance with WAC 480-93-110(3) and (5)?

**Q28 Reference****Q28 Result**

Satisfactory

WAC 480-93-110 (3) and (5)

## Q28 Notes

CP 755 section 8.6.3.1

## OPERATIONS &amp; MAINTENANCE PROCEDURES

## Question 29

Does the operator's procedure specify detailed gas leak investigation, evaluation, classification, and remedial action/repair prioritization steps in sufficient detail in order to ensure compliance with WACs 480-93-185, -186, and -18601?

## Q29 Reference

WAC 480-93-185

## Q29 Reference 2

WAC 480-93-186

## Q29 Reference 3

WAC 480-93-18601

## Q29 Result

Satisfactory

## Q29 Notes

CP 750

## Question 30

Does the operator have sufficiently detailed procedures for pressure testing and test records composition/retention requirements to ensure compliance with WAC 480-93-170 and Part 192 Subpart J?

## Q30 Reference

WAC 480-93-170

## Q30 Reference 2

Part 192 Subpart J

## Q30 Result

Satisfactory

## Q30 Notes

CP 665

Most all of the testing requirements were looked at through IA. Subpart J is a comprehensive testing code. CNG has adequate procedures to address the requirements.

## Question 31

Do the operator's procedures contain sufficient detail to comply with the required entries for all gas leak records according to the criteria outlined in WAC 480-93-187(1-13)?

## Q31 Reference

WAC 480-93-187

## Q31 Result

Satisfactory

## Q31 Notes

CP 750

## Question 32

Does the operator's leak survey procedure contain sufficient detail to assure compliance with instrumentation accuracy, survey intervals, records retention, and self-audits of the leak survey program as specified in WAC 480-93-188?

## Q32 Reference

WAC 480-93-188

## Q32 Result

Satisfactory

## Q32 Notes

CP 715

OPS 10

## Question 33

Does the operator have sufficiently detailed procedures that detail service valve maintenance consistent with the requirements in WAC 480-93-100 and Part 192, Subpart M? Do the procedures prescribe service valve maintenance intervals of 1 per yr/ NTE 15months? Is the maintenance selection criteria consistent with WAC 480-93-100(2)(a-f)?

## Q33 Reference

WAC 480-93-100

## Q33 Reference 2

Part 192 Subpart M

## Q33 Result

Satisfactory

## Q33 Notes

CP 604

OPS 703 section 3.3

**Question 34**

Do the operators procedures specify detailed steps to comply with the proximity consideration requirement in WAC 480-93-020?

**Q34 Reference**

WAC 480-93-020

**Q34 Result**

Satisfactory

**Q34 Notes**

OPS 10 section 13

**Question 35**

Does the operator's OQ plan/procedure identify "New Construction" activities as covered tasks in accordance with WAC 480-93-013?

**Q35 Reference**

WAC 480-93-013

**Q35 Result**

Satisfactory

**Q35 Notes**

OPS 800 under Scope second section (b)

**Question 36**

Do the operator's procedures specify use of odorant testing instrumentation, calibration, and applicable intervals in accordance with WAC 480-93-015? Does the procedure mandate retention of records of tests performed and equipment calibration for 5 years?

**Q36 Reference**

WAC 480-93-015

**Q36 Result**

Satisfactory

**Q36 Notes**

OPS 612

**PROCEDURES: SUMMARY OF REQUIRED COMMENTS**

PROCEDURE REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

CNG is currently undergoing a major procedures manual update as they merge procedures with MDU's.

**ADDITIONAL HEADER TEMPLATE****Question 37**

Template for additional questions

**Q37 Reference**

WAC 480-75-330

**Q37 Result**

Not Applicable

**Q37 Notes**

Comments Template for additional comment boxes