

Inspection Output (IOR)

Generated on 2022.May.04 16:23

Report Filters

Assets All, excluding items not linked to any asset.

Results All

Inspection Information

Inspection Name	2022-36 AVA GCC Section 114 DIST	Operator(s)	AVISTA CORP (31232) Lead Paulo Pinto	Plan Submitted	03/01/2022
Status	PLANNED	Team Members	David Hoy, Cody Cox	Plan Approval	03/01/2022 by Kevin Hennessy
Start Year	2022	Observer(s)	Scott Rukke, Bruce Perkins	All Activity Start	02/25/2022
System Type	GD	Director	Kevin Hennessy	All Activity End	12/30/2022
Protocol Set ID	GD.2022.02			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

This inspection will consist of review of company policies and procedures associated with Section 114 updated requirements.

Operator and OPUC Staff (Present During Inspection)

Avista (AVA) Personnel:

- Randy Bareither

Oregon Public Utility Commission (OPUC) Staff:

- David Hoy - Senior Pipeline Safety Analyst
- Cody Cox - Senior Pipeline Safety Analyst
- Paulo Pinto - Damage Prevention Analyst
- Kevin Hennessy - Chief Pipeline Safety, Manager

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 2022-36 AVA	2022-36 AVA GCC Section 114 DIST	unit	88921	--	20	20	20	20	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	2022-36 AVA	--	114.GD	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	2022-36 AVA GCC Section 114 DIST	--	02/25/2022	12/30/2022	--	all planned questions	2022- all 36 AV types A	20	20	20	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".
3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

This inspection has no Form data entry.

Results (all values, 20 results)

40 (instead of 20) results are listed due to re-presentation of questions in more than one sub-group.

114.GD: Section 114 - Gas Distribution

1. Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S**, (also presented in: 114.MM)
 Question Text *What are your assets comprised of?*
 Assets Covered **2022-36 AVA**
 Result Notes **Natural Gas Transmission and Distribution Facilities (GT and GD)**
2. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.MM)
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*
 Assets Covered **2022-36 AVA**
 Result Notes **Avista transports natural gas only**
3. Question Result, ID, References **NA, SRN.114.DRIVERENGINE.S**, (also presented in: 114.MM)
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*
 Assets Covered **2022-36 AVA**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

Avista has no engines/compressors in Oregon
4. Question Result, ID, References **NIC, SRN.114.NGUSE.S**, (also presented in: 114.MM)
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*
 Assets Covered **2022-36 AVA**
 Result Notes **Avista utilizes natural gas as fuel for inline heaters.**
5. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*

Assets Covered 2022-36 AVA

Result Notes Avista Gas Standards Manual (GSM) Section 5.11 Leak Survey (Rev. 21)

DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

6. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

GSM Section 3.17 Purging Pipelines (Rev. 14)

7. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*

Assets Covered 2022-36 AVA

Result Notes Avista Gas Emergency and Service Handbook (GESH) Section 2 Leak and Odor Investigation (Rev. 22)

8. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

9. Question Result, ID, References Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

10. Question Result, ID, References Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*

Assets Covered 2022-36 AVA

Result Notes Avista Gas Standards Manual (GSM) Section 5.11 Leak Survey (Rev. 21)

DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

11. Question Result, ID, References Sat, 114.114.LKMITRPRLAUF.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

12. Question Result, ID, References Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*

Assets Covered 2022-36 AVA

Result Notes GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

13. Question Result, ID, References Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*

Assets Covered 2022-36 AVA

Result Notes GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

14. Question Result, ID, References Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*

Assets Covered 2022-36 AVA

Result Notes GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

15. Question Result, ID, References Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*

Assets Covered 2022-36 AVA

Result Notes GSM Section 3.17 Purging Pipelines (Flaring of Natural Gas) (Rev. 14)

16. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*

Assets Covered 2022-36 AVA

Result Notes GSM Section 5.12 Regulator and Relief Inspection (Rev. 18)

17. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

18. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

19. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

Example - Plastic Pipe Replacement Programs (Adyl A)

20. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*

Assets Covered 2022-36 AVA

Result Notes DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)

114.MM: Section 114 - Master Meter

21. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GD)

Question Text *What are your assets comprised of?*

Assets Covered 2022-36 AVA

Result Notes **Natural Gas Transmission and Distribution Facilities (GT and GD)**

22. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.GD)
Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*
Assets Covered **2022-36 AVA**
Result Notes **Avista transports natural gas only**
23. Question Result, ID, References **NA, SRN.114.DRIVERENGINE.S**, (also presented in: 114.GD)
Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*
Assets Covered **2022-36 AVA**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

Avista has no engines/compressors in Oregon
24. Question Result, ID, References **NIC, SRN.114.NGUSE.S**, (also presented in: 114.GD)
Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*
Assets Covered **2022-36 AVA**
Result Notes **Avista utilizes natural gas as fuel for inline heaters.**
25. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*
Assets Covered **2022-36 AVA**
Result Notes **Avista Gas Standards Manual (GSM) Section 5.11 Leak Survey (Rev. 21)**

DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)
26. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*
Assets Covered **2022-36 AVA**
Result Notes **DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)**

GSM Section 3.17 Purging Pipelines (Rev. 14)
27. Question Result, ID, References **Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*
Assets Covered **2022-36 AVA**
Result Notes **Avista Gas Emergency and Service Handbook (GESH) Section 2 Leak and Odor Investigation (Rev. 22)**
28. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
Assets Covered **2022-36 AVA**
Result Notes **DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)**
29. Question Result, ID, References **Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*
Assets Covered **2022-36 AVA**
Result Notes **DIMP Appendix D (Leak Detection and Repair (LDAR) Process Review)**

30. Question Result, ID, References [Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [Avista Gas Standards Manual \(GSM\) Section 5.11 Leak Survey \(Rev. 21\)](#)
[DIMP Appendix D \(Leak Detection and Repair \(LDAR\) Process Review\)](#)
31. Question Result, ID, References [Sat, 114.114.LKMITRPLAUF.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [DIMP Appendix D \(Leak Detection and Repair \(LDAR\) Process Review\)](#)
32. Question Result, ID, References [Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [GSM Section 5.12 Regulator and Relief Inspection \(Rev. 18\)](#)
33. Question Result, ID, References [Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [GSM Section 5.12 Regulator and Relief Inspection \(Rev. 18\)](#)
34. Question Result, ID, References [Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [GSM Section 5.12 Regulator and Relief Inspection \(Rev. 18\)](#)
35. Question Result, ID, References [Sat, 114.114.FLARE.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [GSM Section 3.17 Purging Pipelines \(Flaring of Natural Gas\) \(Rev. 14\)](#)
36. Question Result, ID, References [Sat, 114.114.GNLDSGCNCFG.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [GSM Section 5.12 Regulator and Relief Inspection \(Rev. 18\)](#)
37. Question Result, ID, References [Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
 Assets Covered [2022-36 AVA](#)
 Result Notes [DIMP Appendix D \(Leak Detection and Repair \(LDAR\) Process Review\)](#)
38. Question Result, ID, References [Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108\(a\)](#) (also presented in: 114.GD)
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered [2022-36 AVA](#)

Result Notes [DIMP Appendix D \(Leak Detection and Repair \(LDAR\) Process Review\)](#)

39. Question Result, ID, References [Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108\(a\)](#) (also presented in: [114.GD](#))

Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*

Assets Covered [2022-36 AVA](#)

Result Notes [DIMP Appendix D \(Leak Detection and Repair \(LDAR\) Process Review\)](#)

[Example - Plastic Pipe Replacement Programs \(Adyl A\)](#)

40. Question Result, ID, References [Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108\(a\)](#) (also presented in: [114.GD](#))

Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*

Assets Covered [2022-36 AVA](#)

Result Notes [DIMP Appendix D \(Leak Detection and Repair \(LDAR\) Process Review\)](#)

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

Inspection Results (IRR)

Generated on 2022.May.04 16:21

- 2022-36 AVA (40)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 2022-36 AVA

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
1.	2022-36 AVA	NIC	2	114.GD	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
2.	2022-36 AVA	NIC	2	114.GD	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
3.	2022-36 AVA	NA	2	114.GD	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
4.	2022-36 AVA	NIC	2	114.GD	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
5.	2022-36 AVA	Sat	2	114.GD	5. 114.114.LKRLSID.P	49 U.S.C. 60108(a)	Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?
6.	2022-36 AVA	Sat	2	114.GD	6. 114.114.LKRLSVENT.P	49 U.S.C. 60108(a)	Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
7.	2022-36 AVA	Sat	2	114.GD	7. 114.114.LKRLSUNEXPCTVENT.P	49 U.S.C. 60108(a)	Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?
8.	2022-36 AVA	Sat	2	114.GD	8. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
9.	2022-36 AVA	Sat	2	114.GD	9. 114.114.LKRLSDETECTLK.P	49 U.S.C. 60108(a)	Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?
10.	2022-36 AVA	Sat	2	114.GD	10. 114.114.LKRLSIDMITRPR.P	49 U.S.C. 60108(a)	Do procedures define a process to identify, classify, mitigate and repair leaks?
11.	2022-36 AVA	Sat	2	114.GD	11. 114.114.LKMITRPLAUF.P	49 U.S.C. 60108(a)	Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 2022-36 AVA

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							actions to reduce the associated volume?
12.	2022-36 AVA	Sat	2	114.GD	12. 114.114.REGSTATIONOM.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?
13.	2022-36 AVA	Sat	2	114.GD	13. 114.114.REGSTATIONCONFIG.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?
14.	2022-36 AVA	Sat	2	114.GD	14. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
15.	2022-36 AVA	Sat	2	114.GD	15. 114.114.FLARE.P	49 U.S.C. 60108(a)	Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
16.	2022-36 AVA	Sat	2	114.GD	16. 114.114.GNLDSGNCNFG.P	49 U.S.C. 60108(a)	Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
17.	2022-36 AVA	Sat	2	114.GD	17. 114.LEAKPRONE.LKRLS.P	49 U.S.C. 60108(a)	What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
18.	2022-36 AVA	Sat	2	114.GD	18. 114.LEAKPRONE.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
19.	2022-36 AVA	Sat	2	114.GD	19. 114.LEAKPRONE.LKMITGRPREXAMPLE.P	49 U.S.C. 60108(a)	Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
20.	2022-36 AVA	Sat	2	114.GD	20. 114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a)	Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?
21.	2022-36 AVA	NIC	2	114.MM	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 2022-36 AVA

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
22.	2022-36 AVA	NIC	2	114.MM	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
23.	2022-36 AVA	NA	2	114.MM	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
24.	2022-36 AVA	NIC	2	114.MM	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
25.	2022-36 AVA	Sat	2	114.MM	5. 114.114.LKRLSID.P	49 U.S.C. 60108(a)	Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?
26.	2022-36 AVA	Sat	2	114.MM	6. 114.114.LKRLSVENT.P	49 U.S.C. 60108(a)	Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
27.	2022-36 AVA	Sat	2	114.MM	7. 114.114.LKRLSUNEXPCTVENT.P	49 U.S.C. 60108(a)	Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?
28.	2022-36 AVA	Sat	2	114.MM	8. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
29.	2022-36 AVA	Sat	2	114.MM	9. 114.114.LKRLSDETECTLK.P	49 U.S.C. 60108(a)	Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?
30.	2022-36 AVA	Sat	2	114.MM	10. 114.114.LKRLSIDMITRPR.P	49 U.S.C. 60108(a)	Do procedures define a process to identify, classify, mitigate and repair leaks?
31.	2022-36 AVA	Sat	2	114.MM	11. 114.114.LKMITRPLAUF.P	49 U.S.C. 60108(a)	Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?
32.	2022-36 AVA	Sat	2	114.MM	12. 114.114.REGSTATIONOM.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?
33.	2022-36 AVA	Sat	2	114.MM	13. 114.114.REGSTATIONCONFIG.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures contain measures for identifying potential

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 2022-36 AVA

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							configuration changes that would reduce natural gas releases from regulators?
34.	2022-36 AVA	Sat	2	114.MM	14. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
35.	2022-36 AVA	Sat	2	114.MM	15. 114.114.FLARE.P	49 U.S.C. 60108(a)	Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
36.	2022-36 AVA	Sat	2	114.MM	16. 114.114.GNLDSGNCNCFG.P	49 U.S.C. 60108(a)	Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
37.	2022-36 AVA	Sat	2	114.MM	17. 114.LEAKPRONE.LKRLS.P	49 U.S.C. 60108(a)	What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
38.	2022-36 AVA	Sat	2	114.MM	18. 114.LEAKPRONE.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
39.	2022-36 AVA	Sat	2	114.MM	19. 114.LEAKPRONE.LKMITGRPREXAMPLE.P	49 U.S.C. 60108(a)	Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
40.	2022-36 AVA	Sat	2	114.MM	20. 114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a)	Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

Report Parameters: All non-empty Results

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection

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