

# Form A- Annual Review 8616

UTC Standard Annual Review Inspection Report  
Intrastate Operators  
FORM A: Annual Review

## Inspector and Operator Information

<b>Inspection ID</b> 8616	<b>Inspection Link</b> 8616	<b>Inspector - Lead</b> Derek Norwood	<b>Inspector - Assist</b> Hoxit, Jason
<b>Operator</b> Petrogas West LLC	<b>Unit</b> Ferndale Storage Terminal	<b>Records Location - City &amp; State</b> Ferndale, WA	
<b>Inspection Start Date</b> 12-21-2023	<b>Inspection Exit Interview Date</b> 12-21-2023	<b>Engineer Submit Date</b> 12-28-2023	

## Inspection Summary

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 Scope and Summary

This inspection was conducted remotely via Microsoft Teams on December 21, 2023. The inspection type is Annual Review and included a review of the 2022 annual report along with changes to operator manuals. There are no violations or concerns from this inspection.

### Facilities visited and Total AFOD

Conducted remotely via MS Teams, No facilities visited

1 AFOD

### Summary of Significant Findings

There are no violations or concerns from this inspection.

### Primary Operator contacts and/or participants

Michael Evans, Operations Supervisor

Cody Treavor, Operations Manager

## Instructions and Ratings Definitions

### INSPECTION RESULTS: Annual Review

<b>Satisfactory Responses</b> 19	<b>Satisfactory List</b> 1,3,8,9,10,13,14,15,16,17,18,24,26,27,28,31,32,37,	<b>Number of Unanswered Questions</b> 0	<b>Unanswered List</b>
<b>Unsatisfactory Responses</b> 0	<b>Unsatisfactory List</b>		
<b>Area of Concern Responses</b> 0	<b>Area of Concern List</b>		
<b>Not Applicable Responses</b> 21	<b>Not Applicable List</b> 4,5,6,7,12,19,20,21,22,23,25,29,30,35,38,39,40,41,42,43,44		
<b>Yes Responses</b> 1	<b>Yes List</b> 36,	<b>No Responses</b> 1	<b>No List</b> 34,
<b>Not Checked / Evaluated Responses</b> 0	<b>Not Checked / Evaluated List</b>		

\*\*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 also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

## ANNUAL REPORT: ACCURACY/TRENDS

<b>Question #1.</b> Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.	<b>1. Result</b> Satisfactory
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### 1. Notes

Manual update tasks in Intalex

Pipeline Facility Manual updated this year

Need to include Michael Evans as Regulatory Contact and CC Formal Correspondence

### Access to Complete Distribution Annual Report

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No Report records found					

### Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
No Report records found			

### Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group
2022	Petrogas West LLC	HVL
2021	Petrogas West LLC	HVL
2020	Petrogas West LLC	HVL
2019	Petrogas West LLC	HVL

## DAMAGE PREVENTION

**Annual Report Damage Prevention data**

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks per 1,000 Miles of MAIN
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No Damages records found

**DIRT data on mismarks for prior year**

Damage Cause	Number of Reports
No Report records found	

**DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.**

SubmitCompanyID - UTCfinalName	Number of Reports
No Report records found	

**Question #2.**

Review the following damage prevention items:

**Q2. Is the damage prevention information in the annual report complete?**

Yes, no damages

**Q2.b. Is the annual report damages root cause information complete and accurate?**

N/A, no damages

**Q2.d. Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?**

N/A

**Q2.e. Is the operator or its contractor qualified and following procedures for locating and**

Reviewed OQs during the standard inspection

**Q2.g. What is the number of damages resulting from mismarks?**

0

**Q2.h. What is the number of damages resulting from not locating within the time require**

0

**Q2.j. Are mapping corrections timely and according to written procedures?**

N/A, no mapping errors discovered

**Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavati**

N/A, no such events have occurred

**2. Notes**

**NPMS SUBMISSIONS/CHANGES**

**Question #3.**

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission? Satisfactory

**3. Result**

**3. Notes**

Submitted June 2023 for 2022

**INCIDENT/SRC/AOC REPORTS REVIEW**

**Question #4**

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

**4. Results**

Not Applicable

**4. Notes**

No federally reportable incidents

**Q4: Federally reportable incidents**

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
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NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No Incident Notification records found									

**Question #5.**

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Result**  
Not Applicable

**5. Notes**

No accidents or failures

**Question #6.**

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
No Incident Notification records found						

**6. Result**  
Not Applicable

**6. Notes**

No incidents

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No Incident Notification records found							

**7. Result**  
Not Applicable

**7. Notes**

No SRCs

**Question #8.**

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**  
Satisfactory

**8. Notes**

MOV 650 on Butane line not functioning in April 2022, created temporary operating procedure

Used manual isolation valve and left MOV open

Valves at tank are also associated with ESDs so system still could have been shut down

Bay Valve worked on MOV

Bad Thrust Base, tested torque and made repairs

## O&M & EMERGENCY PROGRAMS

**Question #9.**

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

**9. Result**  
Satisfactory

**9. Notes**

Up to date manuals in Sharepoint

**Question #10.**

If changes to the O&M were made, are changes acceptable?

**10. Result**  
Satisfactory

**10. Notes**

No major changes identified but annual review is completed and tracked through Intellex

**Question #11.**

Were emergency plans changed during the previous year?

**11. Result**

Satisfactory

**11. Notes**

Emergency Action Plan to be updated to Altagas document next, no revisions this year

**Question #12.**

Were any changes to emergency plans satisfactory?

**12. Result**

Not Applicable

**12. Notes**

No revisions this year

## INTEGRITY MANAGEMENT PROGRAMS

**Question #13**

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

**13. Result**  
Satisfactory

**13. Notes**

Altagas uses a program called All Assets and assigns PM Tasks to Petrogas

Significant changes go through MOC Process, changed to overarching process for company wide during aquisition

**Question #14.**

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

**14. Result**  
Satisfactory

**14. Notes**

Altgas system wide Facility Integrity Program  
 Reporting org chart updated  
 Update to how inspections are completed  
 Annual reviews and ongoing, code committees to ensure document is current

**Question #15** **15. Results**  
 Are IMP program changes acceptable? Satisfactory

**15. Notes**  
 Changes are acceptable

**Question #16** **16. Results**  
 Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities) Satisfactory

**16. Notes**  
 Reviewed FIP Form 001 - Inspection Scope Form

**Question #17** **17. Results**  
 Does the operator's HCA location data correspond to the positional data located in UTC GIS? Satisfactory

**17. Notes**  
 Entire facility and pipeline is included in Facility Integrity Plan

**Question #18** **18. Results**  
 What assessment work is planned for the upcoming year? Satisfactory

**18. Notes**  
 UT Inspections planned for 2024 on propane and butane pipelines

**Question #19** **19. Results**  
 Within the operator's DIMP, are low pressure systems evaluated for overpressure threats? Not Applicable

**19. Notes**  
 Not a distribution operator

**Question #20** **20. Results**  
 Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section) Not Applicable

**20. Notes**  
 Not a distribution operator

**Question #21** **21. Results**  
 Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans? Not Applicable

**21. Notes**  
 Not a distribution operator

**Question #22** **22. Results**  
 Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities) Not Applicable

**22. Notes**  
 Not a distribution operator

**Question #23** **23. Results**  
 What DIMP remediation work is anticipated for upcoming year? Not Applicable

**23. Notes**  
 Not a distribution operator

▼ **OQ PROGRAM**

**Question #24** **24. Results**  
 Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe. Satisfactory

**24. Notes**  
 Document migration through Altgas happening in 2024, no changes this year, reviewed annually

**Question #25** **25. Results**  
 Are the OQ plan updates satisfactory? Not Applicable

**25. Notes**  
 No changes

**Question #26** **26. Results**  
 Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan? Satisfactory

**26. Notes**  
 Using EWN, reviewed records during Standard Inspection

▼ **PUBLIC AWARENESS PROGRAM**

**Question #27** **27. Results**  
 Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year? Satisfactory

**27. Notes**  
 Updated this week, updated stakeholder list, no major changes

**Question #28** **28. Results**  
 Are changes to the PA program satisfactory? Satisfactory

**28. Notes**  
 Revision completed and provided to UTC

▼ **CONTROL ROOM PROGRAM**

**Question #29**

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

**29. Results**

Not Applicable

**29. Notes**

No Part 195 control room

**Question #30**

Are the CRM program changes satisfactory?

**30. Results**

Not Applicable

**30. Notes**

No Part 195 control room

**SAFETY MANAGEMENT SYSTEM API 1173****Question #31**

Is the operator developing and implementing an API 1173 Safety Management System?

**31. Results**

Satisfactory

**31. Notes**

Another form of Intelex that tracks HazIDs, incidents, near misses, etc.

Overseen by Petrogas and Altagas

Plan, Do, Check, Act information in Facility Integrity Program

**INSPECTOR ASSESSMENT OF INSPECTION UNITS****Question #32**

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

**32. Results**

Satisfactory

**32. Notes**

One unit, no changes recommended

**Q32: List of current inspection units**

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	Operator - OPID	Unit ID
<b>Petrogas West LLC (1 Unit)</b>					
Petrogas - Ferndale Storage Terminal	Hazardous Liquid	Intrastate	Liquid	39663	Petrogas - Ferndale Storage Terminal

**OPERATOR'S PUBLIC WEB PAGE****Question #33**

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

**33. Results**

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.C Pipe Location Information ; Q33.D How to get additional information ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.K Pipeline Location Information ; Q33.M Emergency Preparedness

**33. Notes**

Reviewed AltaGas website and found information for items listed

**ADVISORY BULLETIN REVIEW****Question #34**

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

**ADB 2019-01**

ADB 2019-01 Flood Mitigation

**34. Results**

NO

**34. Notes**

No river or streams nearby

**Question #35**

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

**ADB 2019-01**

ADB 2019-01: Flood Mitigation

**35. Results**

Not Applicable

**35. Notes**

No river or streams nearby

**Question #36**

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

**ADB 2019-02**

ADB 2019-02: Earth Movement/Geological Hazards

**36. Results**

YES

**36. Notes****Question #37**

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

**ADB 2019-02**

ADB 2019-02: Earth Movement/Geological Hazards

**37. Results**

Satisfactory

**37. Notes**

Checklist for operations to review in event of earthquake

Earthquake Operations Checklist

Include checking flanges, skid, connections to tank, tank foundation, insulation, etc.

**Question #38**

Does the operator have any indoor meter sets or regulators in their system?

**ADB 2020-01**

ADB 2020-01 Inside Meter Sets

**38. Results**

Not  
Applicable

**38. Notes**

Not a distribution operator

**Question #39**

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

**ADB 2020-01**

ADB 2020-01 Inside Meter Sets

**39. Results**

Not  
Applicable

**39. Notes**

Not a distribution operator

**Question #40**

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

**ADB 2020-01**

ADB 2020-01 Inside Meter Sets

**40. Results**

Not  
Applicable

**40. Notes**

Not a distribution operator

**Question #41**

Does the operator have any low pressure systems?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**41. Results**

Not  
Applicable

**41. Notes**

Not a distribution operator

**Question #42**

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**42. Results**

Not  
Applicable

**42. Notes**

Not a distribution operator

**Question #43**

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**43. Results**

Not  
Applicable

**43. Notes**

Not a distribution operator

**Question #44**

Does the operator include all low-pressure system risks in their DIMP program appropriately?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**44. Results**

Not  
Applicable

**44. Notes**

Not a distribution operator

**SUMMARY OF REQUIRED COMMENTS**

**COMMENTS:** Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.