

## APPENDIX C

### PG-070132 2007 Natural Gas Standard Inspection

By December 2008, the following procedures will be inserted and addressed in Agrium's Operations and Maintenance Manual:

1. A procedure to annually review the Operations and Maintenance manual for effectiveness annually, as required by 49 CFR 192.605(a).
2. A procedure to periodically review the work done by operator personnel to determine the effectiveness of procedures used in normal operation and maintenance and taking corrective action where deficiencies are found, as required by 49 CFR 192.605(b)(8).
3. A procedure to update reporting requirements in WAC 480-93-200(2)(a-d).
4. A procedure to provide a written report to the Commission within five days of receiving a failure analysis of any incident or hazardous condition that was due to construction defects or material failures, as required by WAC 480-93-200(6).
5. A procedure to require the operator to submit damage statistics annually to the Commission, as required by WAC 480-93-200(7)(b)(iii).
6. A procedure to annually report construction defects and material failures resulting in leakage, as required by WAC 480-93-200(7)(c).
7. A procedure to file emergency contact information with the Commission and appropriate municipal contacts, as required by WAC 480-93-200(8).
8. A procedure to send daily construction and repair reports to the Commission, as required by WAC 480-93-200(9).
9. A procedure to submit appropriate drug and alcohol information to the U.S. Department of Transportation's Office of Pipeline Safety and the Commission, as required by WAC 480-93-200(10).
10. A procedure to refer to the following specific design and construction requirements:
  - a. 49 CFR 192.55 - steel pipe manufacturing
  - b. 49 CFR 192.143 - general design requirements
  - c. 49 CFR 192.144 - qualification of components
  - d. 49 CFR 192.145 - valve design requirements
  - e. 49 CFR 192.147 - flange design requirements
  - f. 49 CFR 192.150 - passage of internal inspection devices
  - g. 49 CFR 192.153 - components fabricated by welding
  - h. 49 CFR 192.155 - welded branch connection design
  - i. 49 CFR 192.159 - pipeline flexibility design
  - j. 49 CFR 192.161 - pipeline support and anchor design
  - k. 49 CFR 192.179 - transmission valve design, or 49 CFR 192.181 - distribution valve requirements
  - l. 49 CFR 192.195 - accidental overpressure design
  - m. 49 CFR 192.199 - design of pressure relief and limiting devices

- n. 49 CFR 192.201 - capacity of pressure relieving and limiting stations
  - o. 49 CFR 192.303 - compliance with specifications and standards for construction activity
  - p. 49 CFR 192.307 - construction inspections
  - q. 49 CFR 192.307 - inspection of materials during construction
  - r. 49 CFR 192.309 - repair of steel pipe
  - s. 49 CFR 192.313 - bends and elbows
  - t. 49 CFR 192.315 - wrinkle bends in steel pipe
  - u. 49 CFR 192.317 - protection from hazards
  - v. 49 CFR 192.319(a-b) - installation of pipe in a ditch
  - w. 49 CFR 192.323 - casings
  - x. WAC 480-93-115 - casings
  - y. 49 CFR 192.325 - underground clearance
  - z. 49 CFR 192.327(a-e) - pipeline cover
11. A procedure to require that weld procedures be qualified under section 5 of API 1104(19<sup>th</sup> edition) or section IX of the ASME Boiler and Pressure Vessel Code, as required by 49 CFR 192.225(a).
  12. A procedure to comply with weld procedures and retain tests and procedures, as required by 49 CFR 192.225.
  13. A procedure to address qualification of welders, as required by 49 CFR 192.227.
  14. A procedure to describe welder testing and qualifications, measurement of essential variables and documentation of results, as required by WAC 480-93-080(1)(b).
  15. A procedure requiring that weld procedures be on-site when welding is being performed, as required by WAC 480-93-080(1)(d).
  16. A procedure to require welders to carry identification and qualification cards, as required by WAC 480-93-080(3).
  17. A procedure that requires that welders may not weld with a particular process unless he or she has welded with that process within the previous six months, as required by 49 CFR 192.229(b).
  18. A procedure that addresses welder qualifications and associated testing, as required by 49 CFR 192.229(c).
  19. A procedure to address protection from weather during welding, as required by 49 CFR 192.231.
  20. A procedure prohibiting or addressing miter joints, as required by 49 CFR 192.233.
  21. A procedure addressing weld preparation, as required by 49 CFR 192.235.
  22. A procedure describing the inspection and testing of welds, as required by 49 CFR 192.241.
  23. A procedure addressing the nondestructive testing of welds, as required by 49 CFR 192.243(a-f).

24. A procedure addressing repair and removal of weld defects, as required by 49 CFR 192.245.
25. A procedure requiring that corrosion design, installation and maintenance activities required by rule be under the direction of a person qualified in corrosion control methods, as required by 49 CFR 192.453.
26. A procedure addressing aluminum installations near pipelines, as required by 49 CFR 192.455(e).
27. A procedure addressing cathodic protection evaluation, as required by WAC 480-93-110(4).
28. A procedure requiring that pipe-to-soil readings be collected when a buried pipe has been exposed and the coating removed, as required by WAC 480-93-110(8).
29. A procedure addressing atmospheric corrosion control, as required by 49 CFR 192.479.
30. A procedure addressing casing monitoring and response to shorted conditions, as required by WAC 480-93-110(5).
31. A procedure addressing calibration of cathodic protection equipment and instrumentation, as required by WAC 480-93-110(3).
32. A procedure addressing environmental protection and safety during pressure testing, as required by 49 CFR 192.515.
33. A procedure addressing Washington state pressure testing requirements, as required by WAC 480-93-170.
34. A procedure addressing state uprating requirements, as required by WAC 480-93-155, or a statement that uprating will not be done.
35. A procedure requiring a public education program consistent with 49 CFR 192.616(a).
36. A procedure addressing Washington state odorization requirements, as required by WAC 480-93-015(1-4).
37. A procedure to address gas leak investigation requirements, as required by WAC 480-93-185.
38. A procedure to address leak evaluation requirements, as required by WAC 480-93-186.
39. A procedure to address gas leak record requirements, as required by WAC 480-93-187.
40. A procedure to address gas leak surveys, as required by WAC 480-93-188.
41. A procedure to address pipeline marker requirements, as required by WAC 480-93-124.
42. A procedure to address the requirement for prompt remedial action to correct inoperable valves, as required by 49 CFR 192.745(b) and 49 CFR 192.747(b).
43. A procedure to address the prevention of accidental ignition, as required by 49 CFR 192.751.

44. A procedure to require that new construction be identified as a covered task, as required by WAC 480-93-013.
45. A procedure to file design, construction, specification and construction with the Commission if those plans do not conform to existing Company standards, as required by WAC 480-93-017.
46. A procedure to require that records resulting from construction activity be updated within six months, as required by WAC 480-93-018.
47. A procedure to address proximity consideration requirements, as required by WAC 480-93-020.