

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

PART A – INSPECTION IDENTIFICATION

CPF #: click here to enter	<input checked="" type="checkbox"/> Gas <input type="checkbox"/> LNG <input type="checkbox"/> Hazardous Liquid	Date of Inspection: Aug. 24-27, 2009 Sept. 8-11, 2009
---	--	--

PART B – OPERATOR INFORMATION

Pipeline operator/owner: TransCanada Gas Transmission Northwest Corporation	OPID: 15014	Inspection location: Rosalia District Spokane, Washington	Inspection Unit #: 66685
Company Official name, title, telephone, FAX#: Jeff Rush Vice President & General Manager U.S. Western Pipe Region		Mailing address of Company Official: 1400 SW 5 th Ave Suite 900 Portland, OR 97201	
Nature and size of operator’s system (total miles, HCA miles, products, environmental conditions, employees): Rosalia District includes approximately 201 miles of gas transmission pipelines. Pipelines located in HCA including a 36 and 42-inch diameter, each approximately 21 miles in length.			
Portion of system inspected (locations and facilities): The sections of pipeline inspected include a 36-inch and two 42-inch diameter pipelines from the Washington/Idaho border (MP 106.8) to the Spokane Gate Station (MP 108.2) and two south bound pipelines including 36-inch and 42-inch from the Spokane Gate Station to the Snake River crossing (MP 206.7). The compressor station located at Rosalia, includes a Mars Solar (14K Hp), Titan Solar (19.5K Hp), and a LM-1500, GE (12.5K Hp) turbines. Meter Station located at Spokane, Mica, Spangle, Rosalia, St. John, and LaCrosse were inspected for regulator lockup, set point, overpressure protection, and the facilities in general. During the right-of-way inspection, the line markers were inspected for emergency information, at C/P test sites include: casings, rectifier units and numerous pipe-to-soil readings (See Field Data Report for details).			

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

PART C – VIOLATION and CIVIL PENALTY INFORMATION

Note: Information shown in Part C of this Pipeline Safety Violation Report relates to probable violations, proposed compliance orders, and proposed civil penalties

VIOLATION NUMBER 1

Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii). Enter only one regulation:

192.465 (d) External corrosion control: Monitoring

How did the operator violate the regulation?:

TransCanada did not take prompt remedial action to correct deficient pipe-to-soil value at the Spokane Gate/Meter Station that was identified during the 2007 inspection.

Provide additional detail regarding the violation, including the duration and extent of the violation:

The 6-inch piping has been deficient in cathodic protection for over two years.

Describe the evidence:

During the 2007 field inspection at the Spokane Gate/Meter Station, the 6-inch diameter buried looped piping located between the heater unit and the meter building had a pipe-to-soil value of approximately, -443 mVDC, on. The pipes are coated, located near concrete footings, and approximately 60 feet in length. In 2006 the native potential at this location was measured at approximately -229 mVDC.

During the 2009 field inspection, the same 6-inch looped pipe had a pipe-to-soil potential of -210 mVDC, off. The rectifier was off for approximately the past four weeks to measure the District's native potentials.

How might this violation have impacted public safety? (If an accident or release of product occurred, describe the actual impact on public safety). Was this potential/actual impact in an HCA?

The Spokane Gate/Meter Station is located within a HCA (Class 3 location).

How might this violation have impacted the environment? (If an accident or release of product occurred, describe the actual impact on the environment). Was this potential/actual impact in an HCA?

The release of natural gas would not impact the environment, but would impact gas delivery to the City of Spokane and the county road adjacent to the facility.

Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]:

Mr. Kurt Smith is TransCanada's Pipe Regulatory Specialist. Mr. Smith has completed corrosion courses from the National Association of Corrosion Engineers and understands the importance of cathodic protection for steel pipelines.

Comments of person(s) interviewed regarding the violation:

Mr. Smith said a work order was scheduled for this year, 2009, to install anodes in proximity to the looped pipes and no remediation on the piping has been completed since 2007.

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the Enforcement Guidance for Liquid and Gas Transmission IM)

- Area Finding: [click here to enter](#)
- Risk Category (A-E) [click here to enter](#)

Proposed action: (check one)	<input type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input checked="" type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>	Other: [describe - click here]

Civil Penalty Assessment Considerations For This Violation:

<Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>

C1 — Degree of the operator’s culpability:

C2 — Good faith in attempting to achieve compliance:

C3 — Additional comments applicable to civil penalty:

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

VIOLATION NUMBER [click here to enter]				
Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii). Enter only one regulation: click here to enter				
How did the operator violate the regulation?: click here to enter				
Provide additional detail regarding the violation, including the duration and extent of the violation: click here to enter				
Describe the evidence: click here to enter				
How might this violation have impacted public safety? (If an accident or release of product occurred, describe the actual impact on public safety). Was this potential/actual impact in an HCA? click here to enter				
How might this violation have impacted the environment? (If an accident or release of product occurred, describe the actual impact on the environment). Was this potential/actual impact in an HCA? click here to enter				
Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]: click here to enter				
Comments of person(s) interviewed regarding the violation: click here to enter				
For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the <i>Enforcement Guidance for Liquid and Gas Transmission IM</i>)				
<ul style="list-style-type: none"> • Area Finding: click here to enter • Risk Category (A-E) click here to enter 				
Proposed action: (check one)	<input type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>	Other: [describe - click here]
Civil Penalty Assessment Considerations For This Violation: <Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>				
C1 — Degree of the operator's culpability: click here to enter				
C2 — Good faith in attempting to achieve compliance: click here to enter				
C3 — Additional comments applicable to civil penalty:				

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

[click here to enter](#)

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

VIOLATION NUMBER [click here to enter]				
Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii). Enter only one regulation: click here to enter				
How did the operator violate the regulation?: click here to enter				
Provide additional detail regarding the violation, including the duration and extent of the violation: click here to enter				
Describe the evidence: click here to enter				
How might this violation have impacted public safety? (If an accident or release of product occurred, describe the actual impact on public safety). Was this potential/actual impact in an HCA? click here to enter				
How might this violation have impacted the environment? (If an accident or release of product occurred, describe the actual impact on the environment). Was this potential/actual impact in an HCA? click here to enter				
Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]: click here to enter				
Comments of person(s) interviewed regarding the violation: click here to enter				
For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the <i>Enforcement Guidance for Liquid and Gas Transmission IM</i>)				
<ul style="list-style-type: none"> • Area Finding: click here to enter • Risk Category (A-E) click here to enter 				
Proposed action: (check one)	<input type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>	Other: [describe - click here]
Civil Penalty Assessment Considerations For This Violation: <Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>				
C1 — Degree of the operator's culpability: click here to enter				
C2 — Good faith in attempting to achieve compliance: click here to enter				
C3 — Additional comments applicable to civil penalty: click here to enter				

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

VIOLATION NUMBER [click here to enter]			
Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii). Enter only one regulation: click here to enter			
How did the operator violate the regulation?: click here to enter			
Provide additional detail regarding the violation, including the duration and extent of the violation: click here to enter			
Describe the evidence: click here to enter			
How might this violation have impacted public safety? (If an accident or release of product occurred, describe the actual impact on public safety). Was this potential/actual impact in an HCA? click here to enter			
How might this violation have impacted the environment? (If an accident or release of product occurred, describe the actual impact on the environment). Was this potential/actual impact in an HCA? click here to enter			
Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]: click here to enter			
Comments of person(s) interviewed regarding the violation: click here to enter			
For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the <i>Enforcement Guidance for Liquid and Gas Transmission IM</i>)			
<ul style="list-style-type: none"> • Area Finding: click here to enter • Risk Category (A-E) click here to enter 			
Proposed action: (check one)	<input type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>
	<input type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>
			<input type="checkbox"/> Other: [describe - click here]
Civil Penalty Assessment Considerations For This Violation: <Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>			
C1 — Degree of the operator's culpability: click here to enter			
C2 — Good faith in attempting to achieve compliance: click here to enter			
C3 — Additional comments applicable to civil penalty:			

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

[click here to enter](#)

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

VIOLATION NUMBER [click here to enter]				
Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii). Enter only one regulation:				
click here to enter				
How did the operator violate the regulation?:				
click here to enter				
Provide additional detail regarding the violation, including the duration and extent of the violation:				
click here to enter				
Describe the evidence:				
click here to enter				
How might this violation have impacted public safety? (If an accident or release of product occurred, describe the actual impact on public safety). Was this potential/actual impact in an HCA?				
click here to enter				
How might this violation have impacted the environment? (If an accident or release of product occurred, describe the actual impact on the environment). Was this potential/actual impact in an HCA?				
click here to enter				
Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]:				
click here to enter				
Comments of person(s) interviewed regarding the violation:				
click here to enter				
For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the Enforcement Guidance for Liquid and Gas Transmission IM)				
<ul style="list-style-type: none"> • Area Finding: click here to enter • Risk Category (A-E) click here to enter 				
Proposed action:	[]	NOPV w/ civil penalty	[]	NOPV w/ civil penalty & compliance order
(check one)	[]	NOPV w/ compliance order	[]	Other: [describe - click here]
Civil Penalty Assessment Considerations For This Violation:				
<Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>				
C1 — Degree of the operator's culpability:				
click here to enter				
C2 — Good faith in attempting to achieve compliance:				
click here to enter				
C3 — Additional comments applicable to civil penalty:				

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

[click here to enter](#)

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

PART D – History of Prior Offenses

Note: Complete Part D only if at least one of the probable violations has a proposed civil penalty

PRIOR OFFENSES				
(for the 5 year period prior to the approx. date of this inspection's NOPV letter)				
Date of Final Order	CPF #	What type of enforcement action(s) (CO, CP) are in the Final Order ?	Number of offenses in Final Order	Identify the regulation(s) violated (Part, Section, and specific Paragraph)
[click]	[click]	[click here to enter]	[click]	[click here to enter]
[click]	[click]	[click here to enter]	[click]	[click here to enter]
[click]	[click]	[click here to enter]	[click]	[click here to enter]
[click]	[click]	[click here to enter]	[click]	[click here to enter]

Press TAB in the cell above to add rows

Inspector's signature & organization

Date:

PHMSA Region Director's signature

Date:

(Rev. 1/09)

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

Evidence Exhibit A

Name of Operator: [\[click here to enter\]](#)

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

Press TAB in above cell for more rows

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

Evidence Exhibit B

Name of Operator: [\[click here to enter\]](#)

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

Press TAB in above cell for more rows

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

Evidence Exhibit C

Name of Operator: [click here to enter]

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

Press TAB in above cell for more rows

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

Evidence Exhibit D

Name of Operator: [click here to enter]

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

Press TAB in above cell for more rows