



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-090003

**CERTIFIED MAIL**

September 8, 2010

Eldon N. Book  
Executive Vice President  
Chief Operating Officer  
Cascade Natural Gas  
555 South Cole Road  
PO Box 7608  
Boise, ID 83707

Dear Mr. Book:

**RE: 2009 Natural Gas Standard Inspection – Kitsap County**

The Washington Utilities and Transportation Commission (UTC) staff conducted a natural gas safety standard inspection from November 2-5 and November 9-10, 2009, of Cascade Natural Gas (CNG) – Kitsap County District pipeline system. The inspection included a review of records, procedures and pipeline facilities. Staff conducted an exit interview with CNG General Manager (GM) and Compliance Manager on November 10, 2009.

Our inspection indicated 19 probable violations as noted in the enclosed report. Staff also noted 3 areas of concern, which unless corrected, could lead to future violations of state or federal pipeline safety rules.

We have decided not to conduct additional enforcement action at this time due to the extreme time lag in issuing this findings letter. We advise you however to take any steps necessary to correct the items identified in the attached report. Docket number PG-090003 will be closed as of September 8, 2010.

If you have any questions, please contact Stephanie Zuehlke, Pipeline Safety Engineer at (360) 664-1318. Please refer to docket number PG-090003 in any future correspondence regarding this inspection.



Cascade Natural Gas-Kitsap County  
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Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe Schol for David Lykken".

David D. Lykken  
Pipeline Safety Director

Enclosure

cc. Daniel E. Meredith, CNG  
Chanda Marek, P.E. CNG

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2009 Natural Gas Pipeline Safety Inspection**  
**Cascade Natural Gas – Kitsap County**  
**Docket PG-090003**

The following probable violation(s) and areas of concern of Title 49, CFR Part 192, WAC 480-90 and WAC 480-93 were noted as a result of the inspection of Cascade Natural Gas (CNG) – Kitsap County. The inspection included a random selection of records, operation and maintenance, emergency response, inventory and field inspection of the pipeline facilities.

**PROBABLE VIOLATIONS**

**1. WAC 480-90-328 Meter identification.**

*Gas utilities must identify each meter by a unique series of serial numbers, letters, or combination of both, placed in a conspicuous position on the meter, along with the utility's name or initials. Utilities must update the name or initials on its meters within three years of a name change.*

**Finding (s):**

CNG did not identify meters in accordance with this rule. Examples follow:

- a. W. National Ave. & W. E St. Bremerton (Westside Improvement Club, Inc.)
  - i. No company identification
- b. Meter 410623 (Between 333 & 329 Callow, Bremerton)
  - i. No company identification
- c. Meter 197601 (Bremerton)
  - i. No company identification
- d. 3519 Arsenal Rd. (Bremerton)
  - i. No company identification
  - ii. No unique number
- e. 4710 Auto Center Blvd., Bremerton Bar code 02 28519842
  - i. No company identification
- f. NE corner NW Plaza Rd. & Randall Way NW (Shopping Center - Round Table Pizza, Silverdale)
  - i. No company identification
  - ii. No unique number

**2. WAC 480-93-018 Records.**

- (1) *Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.*

- (5) *Each gas pipeline company must update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.*

**Finding (s):**

1. Atmospheric corrosion monitoring records are insufficient to demonstrate compliance. The 12.21.05 Atmospheric Corrosion records contain multiple inspections documented on the same form – unable to determine outcome from this documentation.

a.	3401 Arsenal Way		12.21.05	11.30.06
b.	3411 Arsenal Way	08.21.02	12.21.05	11.30.06
c.	3517 Arsenal Way	08.21.02	12.21.05	11.30.06
d.	3519 Arsenal Way	08.21.02	12.21.05	11.30.06
e.	3715 Arsenal Way	08.21.02	12.21.05	11.30.06
f.	3708 Arsenal Way	08.21.02	12.21.05	11.30.06
g.	3709 Arsenal Way	08.21.02	12.21.05	11.30.06
h.	3737 Arsenal Way	08.21.02	12.21.05	11.30.06
i.	242 S. Yantic Ave.		12.21.05	11.30.06

2. Atmospheric corrosion monitoring records are insufficient to demonstrate compliance. CNG did not provide the two most recent inspection records.

- a. 937/939 Callow Ave., Bremerton
- b. 641 Callow St., Bremerton
- c. N of 2706 6<sup>th</sup> St., Bremerton – (N. of Meter 273904)
- d. W of 347 N Callow Ave., Bremerton – (W. of Meter 241073)
- e. Meter 109802 – N Callow Ave., Bremerton
- f. Meter 152328 – Callow Ave., Bremerton
- g. 9987 Silverdale Way Northwest, Silverdale - Meter 179895
- h. 4303 Kitsap Way, Bremerton
- i. Meters 685707, 598593, & 234429
- j. 10710 Hillsboro Dr. NW, Silverdale – Meter 236942
- k. 10790 Hampton Ave. NW, Silverdale – Meter 569244
- l. 10792 Hampton Ave. NW, Silverdale – Meter 127053
- m. 10794 Hampton Ave. NW, Silverdale – Meter 239492
- n. 10798 Hampton Ave. NW, Silverdale – Meter 236324
- o. 10830 NW Hampton Ave., Silverdale – Meter 221830
- p. 10838 Hampton Ave. NW, Silverdale – Meter 238511

3. Atmospheric corrosion monitoring records are insufficient to demonstrate compliance. Atmospheric corrosion monitoring records printed on 12.21.05 show handwritten CNG inspection dates which occur approx. 3 years before the 12.21.05 form print date.

- a. 3519 Arsenal Way 08.21.02

b.	3517 Arsenal Way	08.21.02
c.	3715 Arsenal Way	08.21.02
d.	3713 Arsenal Way	08.21.02
e.	3709 Arsenal Way	08.21.02
f.	3708 Arsenal Way	08.21.02
g.	3737 Arsenal Way	08.21.02
h.	4710 Auto Center Blvd.	09.06.02
i.	4901 Auto Center Blvd.	09.06.02
j.	4907 Auto Center Blvd.	09.06.02
k.	4921 Auto Center Blvd.	09.06.02
l.	4940 Auto Center Blvd.	09.06.02
m.	4949 Auto Center Blvd.	09.06.02
n.	4949-1/2 Auto Center Blvd.	09.06.02
o.	250 Wilkes Ave.	09.06.02
p.	5008 Auto Center Blvd.	09.06.02
q.	4091 Country Ln. NW #2	09.19.02
r.	2417 NW Greenhaven Pl.	09.19.02
s.	4091 Country Ln. NW #1	09.19.02
t.	4091 Country Ln. NW Lndry.	09.19.02
u.	6708 Kitsap Way	09.06.02
v.	6710 Kitsap Way #A	09.06.02
w.	6710 Kitsap Way #B	09.06.02
x.	6720 Kitsap Way	09.06.02
y.	6722 Kitsap Way	09.06.02
z.	6724 Kitsap Way	09.06.02

4. Maps kept in service vehicles which are utilized by service personnel have not been updated. During OQ field review, staff noted that maps utilized in the field by two CNG employees were dated May 2007.
5. Incomplete OQ records were provided for a construction employee/welder (Employee initials: D.M.). CNG records identify there are two active welders in this district.

3. **WAC 480-93-110 Corrosion Control.**

- (3) *Cathodic protection equipment and instrumentation must be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then instruments must be tested for accuracy at an appropriate schedule determined by the gas pipeline company.*
- (9) *Each gas pipeline company must have a written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action.*

**Finding (s):**

1. CNG did not provide complete atmospheric corrosion records at time of inspection. The following records were received after the inspection. CNG exceeded the remediation time period identified in CNG Procedure CP 754.037. *All* inspection dates listed below identify that the location "Needs Paint" and was not remediated.

a.	925 Adele Ave.	11.21.06	01.28.09
b.	911 Adele Ave.	11.21.06	01.28.09
c.	652 Adele Ave.		01.28.09
d.	650 Adele Ave.		01.28.09
e.	648 Adele Ave.		01.28.09
f.	646 Adele Ave.		01.28.09
g.	3401 Arsenal Way	11.30.06	06.10.09
h.	333 Bertha Ave.	11.21.06	
i.	331 Bertha Ave.	11.21.06	
j.	646 Bertha Ave.	11.21.06	
k.	317 N Callow Ave.		01.08.07 07.13.09
	(07.13.09 inspection shows "Good" but no evidence of remediation to "Needs Paint" for inspection of 01.08.07)		
l.	320 Callow Ave. N		01.08.07
m.	321 N Callow Ave.	11.28.06	04.28.09
n.	327 N Callow Ave.	11.29.06	04.28.09
o.	327-1/2 N. Callow Ave.	11.28.06	04.28.09
p.	325 N Callow Ave.	11.28.06	04.28.09
q.	330 Callow Ave. N		01.08.07
r.	332 Callow Ave. N #A		01.08.07
s.	333 N Callow Ave.	11.28.06	04.28.09
t.	335 N Callow Ave.	11.28.06	04.28.09
u.	337 N Callow Ave.	11.28.06	04.28.09
v.	337 Callow Ave. N #B	11.28.06	04.28.09
w.	339 N Callow Ave.	11.28.06	04.28.09
	(04.28.09 inspection shows "Good" but no evidence of remediation to "Needs Paint" for inspection of 11.28.06)		
x.	343 N Callow Ave.	11.28.06	04.28.09
y.	347 N Callow Ave.	11.28.06	04.28.09
z.	617 N Callow Ave.	11.16.06	
aa.	619 Callow Ave. N	11.16.06	
	(McGavins Bakery)		
bb.	621 Callow Ave. N	11.16.06	
cc.	625 Callow Ave. N	11.16.06	
dd.	927 Cambrian Ave.	11.16.06	
ee.	4128 D St.	11.21.06	
ff.	4133 D St.	11.21.06	
gg.	4128 E St.		12.17.08
hh.	2810 Kitsap Way Upr #C	11.16.06	
ii.	2804 Kitsap Way	11.16.06	

jj.	2810 Kitsap Way (Lwr)	11.16.06	
kk.	2820 Kitsap Way	11.16.06	
ll.	3235 Kitsap Way		01.28.09
mm.	3711 Kitsap Way	11.21.06	01.28.09
nn.	911 Mead Ave.	11.16.06	
oo.	921 Mead Ave. N	11.16.06	
pp.	917 Mead Ave. N	11.16.06	
qq.	1103 National Ave.	11.21.06	12.17.08
rr.	1011 S. National Ave.	11.21.06	12.17.08
ss.	1110 Wilbert Ave.	11.21.06	01.28.09
	(01.28.09 inspection shows "Good" but no evidence of remediation to "Needs Paint" for inspection of 11.21.06)		
tt.	2706 6 <sup>th</sup> St.	11.16.06	
uu.	2709 6 <sup>th</sup> St.		04.28.09
vv.	2711 6 <sup>th</sup> St.		04.28.09
ww.	2713 6 <sup>th</sup> St.	11.29.06	04.28.09
	(04.28.09 inspection shows "Good" but no evidence of remediation to "Needs Paint" for inspection of 11.29.06)		
xx.	2712 9 <sup>th</sup> St.	11.16.06	
yy.	2714 9 <sup>th</sup> St. #3	11.16.06	
zz.	3605 9 <sup>th</sup> St.	11.21.06	
aaa.	3411 11 <sup>th</sup> St.	11.21.06	
bbb.	3400 11 <sup>th</sup> St.	11.21.06	01.28.09
	(The Dunes Motel)		
ccc.	3317 11 <sup>th</sup> St.,	11.21.06	01.28.09
ddd.	639 N Wycoff Ave.	11.16.06	
eee.	641 Wycoff Ave.	11.16.06	
fff.	631 Wycoff Ave. #A	11.16.06	
ggg.	631-B N Wycoff Ave.	11.16.06	

2. The following records were available during the inspection. CNG exceeded the atmospheric corrosion remediation time period identified in CNG Procedure CP 754.037. The inspection dates listed below identify that the location "Needs Paint" and was not remediated.

a.	10710 Hillsboro Dr. NW, Silverdale – Meter 236942	05.07.08
b.	10790 Hampton Ave. NW, Silverdale – Meter 569244	05.07.08
c.	10792 Hampton Ave. NW, Silverdale – Meter 127053	05.07.08
d.	10794 Hampton Ave. NW, Silverdale – Meter 239492	05.07.08
e.	10798 Hampton Ave. NW, Silverdale – Meter 236324	05.07.08
f.	10838 Hampton Ave. NW, Silverdale – Meter 238511	05.07.08

3. CNG did not have or did not provide calibration records for contractor voltmeters for 2008 and 2009. They did provide records for 2007.

4. **WAC 480-93-124 Pipeline markers.**

- (5) *Each gas pipeline company must replace markers that are reported damaged or missing within forty-five days.*

**Finding (s):**

CNG does not have a process/procedure for tracking reported damaged or missing pipeline markers which demonstrate that marker replacements occur within forty-five days.

5. **WAC 480-93-140 Service Regulators.**

- (1) *To ensure proper operation of service regulators, each gas pipeline company must install, operate, and maintain service regulators in accordance with federal and state regulations, and in accordance with the manufacturer's recommended installation and maintenance practices.*

**Finding(s):**

1. The sideways orientation of the regulator vent/relief vent terminal(s) does not provide adequate protection.
  - a. Between 333 & 329 Callow, Bremerton - Meter 410623
  - b. 4650 Werner Rd., Bremerton
  - c. 3567 Randall Way NW, Silverdale - Meter 159595
  - d. 3201 NW Randall Way, Silverdale – Meter 565762
  - e. 11<sup>th</sup> St, Bremerton (The Dunes Motel)
  
2. The following regulator vent(s) were found missing vent screens:
  - a. 9833 Poplars Ave. NW Ste. 105, Silverdale (Towne Centre Shopping Complex)
  - b. 3201 NW Randall Way, Silverdale – Meter 565762

6. **WAC 480-93-180 Plans and procedures.**

- (1) *Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system.*

**Finding(s):**

CNG procedure CP 760.091 requires that each weld will be visually inspected by the person making the weld. CNG records identify there are two active welders in this district. Only one of the two welders OQ/visual certifications record was provided.

7. **WAC 480-93-186 Leak evaluation.**

- (1) *Based on an evaluation of the location and/or magnitude of a leak, the gas pipeline company must assign one of the leak grades defined in WAC 480-93-18601 to establish the leak repair priority. A gas pipeline company may use an alphabetical grade classification, i.e., Grade A for Grade 1, Grade B for Grade 2, and Grade C for Grade 3 if it has historically used such a grading designation. Each gas pipeline*



*company must apply the same criteria used for initial leak grading when reevaluating leaks.*

**Finding(s):**

1. Leaks have not been assigned a grade at the scene by personnel completing the leak evaluation. Leaks have been graded by the GM.
2. Leak investigation is a covered task: field personnel are not grading their found leaks. The practice of field staff contacting the General Manager to grade found leaks is inconsistent with this training.
3. No leak grade was assigned for the leak at 1108 Montgomery/2516 11<sup>th</sup> St., Bremerton (split svc.) dated 02.12.08.

8. **WAC 480-93-186 Leak evaluation.**

- (3) *The gas pipeline company must check the perimeter of the leak area with a combustible gas indicator. The gas pipeline company must perform a follow-up inspection on all leak repairs with residual gas remaining in the ground as soon as practical, but not later than thirty days following the repair.*

**Finding(s):**

CNG records do not show documentation that follow-up inspections for residual gas were completed on the following leak repairs.

- |    |                                    |          |
|----|------------------------------------|----------|
| a. | 315 Bryan Ave., Bremerton          | 06.22.09 |
| b. | 13550 Ridgelane Dr. NW, Silverdale | 06.12.09 |

9. **WAC 480-93-187 Gas leak records.**

*Each gas pipeline company must prepare and maintain permanent gas leak records. The leak records must contain sufficient data and information to permit the commission to assess the adequacy of the gas pipeline company's leakage program. Gas leak records must contain, at a minimum, the following information:*

- (1) *Date and time the leak was detected, investigated, reported, and repaired, and the name of the person conducting the investigation;*
- (2) *Location of the leak (sufficiently described to allow ready location by other qualified personnel);*
- (3) *Leak grade;*
- (4) *Pipeline classification (e.g., distribution, transmission, service);*
- (5) *If reported by an outside party, the name and address of the reporting party;*
- (6) *Component that leaked (e.g., pipe, tee, flange, valve);*
- (7) *Size and material that leaked (e.g., steel, plastic, cast iron);*
- (8) *Pipe condition;*
- (9) *Type of repair;*
- (10) *Leak cause;*
- (11) *Date pipe installed (if known);*
- (12) *Magnitude and location of CGI readings left; and*

- (13) *Unique identification numbers (such as serial numbers) of leak detection equipment.*

**Finding(s):**

1. CNG gas leak records do not identify serial numbers of leak detection equipment used.
  - a. 315 Bryan Ave., Bremerton 06.22.09
  - b. 6790 Harris Rd., Port Orchard 11.19.08
  - c. 2516 11<sup>th</sup> St., Bremerton 02.12.08
2. Gas leak records identify the magnitude of CGI reads as % only and do not include a unit label. It is unknown whether the % read indicates LEL or gas to air.

10. **WAC 480-93-188 Gas leak surveys.**

- (1) *Each gas pipeline company must perform gas leak surveys using a gas detection instrument covering the following areas and circumstances:*
- (a) *Over all mains, services, and transmission lines including the testing of the atmosphere near other utility (gas, electric, telephone, sewer, or water) boxes or manholes, and other underground structures;*
  - (b) *Through cracks in paving and sidewalks;*
  - (c) *On all above ground piping (may be checked with either a gas detection instrument or with a soap solution);*
  - (d) *Where a gas service line exists, the gas pipeline company must conduct a leak survey at the building wall at the point of entrance, using a bar hole if necessary; and*
  - (e) *Within all buildings where gas leakage has been detected at the outside wall, at locations where escaping gas could potentially migrate into and accumulate inside the building.*

**Finding(s):**

1. In 2008, CNG neglected to leak survey a gas main located in Section 1, Bremerton - Hwy 303 and McWilliams in Silverdale. CNG documentation shows that this area was surveyed in both 2007 and 2009.
2. Leak survey records lack sufficient documentation to demonstrate that leak surveys occurred over the pipeline and services. Leak survey maps provide a general indication of mains and services. They are shown as a line on the maps and do not contain information to identify the specific location of the mains and services:

11. **49 CFR §192.161 Supports and anchors.**

- (c) *Each support or anchor on an exposed pipeline must be made of durable, noncombustible material and must be designed and installed as follows:*
- (1) *Free expansion and contraction of the pipeline between supports or anchors may not be restricted.*
  - (2) *Provision must be made for the service conditions involved.*

- (3) *Movement of the pipeline may not cause disengagement of the support equipment.*

**Finding(s):**

The following meters are supported by combustible material:

- a. 8340 Barney White Rd., Gorst
- b. 9987 Silverdale Way NW, Silverdale Meter 179895 (Wok on Fire)

12. **49 CFR §192.353 Customer meters and regulators: Location.**

- (a) *Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.*

**Finding(s):**

The following meters are in contact with the soil or other potentially corrosive materials:

- a. NE corner NW Plaza Rd. & Randall Way NW, Silverdale (Shopping Center)
- b. 641 Callow St., Bremerton – Meter 288165
- c. Meter 197601
- d. 3670 Chico Way NW, Bremerton Meter 182956 (Chico Alliance Church)
- e. Meter 234080
- f. 8564 Silverdale Way NW, Silverdale – Meter 609272
- g. Meter 591524 (N. of 2 Margaritas, Silverdale)
- h. Meter 569409 (State Farm Insurance)
- i. 2890 Ridgetop Blvd. NW, Silverdale – Meter 536533

13. **49 CFR §192.355 Customer meters and regulators: Protection from damage.**

- (b) *Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must:*
- (1) *Be rain and insect resistant;*
  - (2) *Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and,*
  - (3) *Be protected from damage caused by submergence in areas where flooding may occur.*

**Finding(s):**

The vent location for the meter manifold (meters 270409 and 624238) on 325 N Callow Ave., Bremerton is placed in a deeply set covered enclosure. The present vent terminal location does not meet code requirements.

14. **49 CFR §192.353 Customer meters and regulators: Locations.**

- (a) *Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.*

**Finding(s):**

1. Meter and service regulator protection/barricades have sustained vehicular damage and no longer provide equipment protection:
  - a. Meter 576058
  - b. Meter 580140
  - c. 3745 G St., Bremerton (W. National Ave. at W. G St.)

15. **49 CFR §192.365 Service lines: Location of valves.**

- (b) *Outside valves. Each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building.*

**Finding(s):**

1. The service valves at the following locations were found buried or partially buried:
  - a. 2890 Ridgetop Blvd. NW, Silverdale – Meter 536533
  - b. Meter 197601
  - c. 3519 Arsenal Rd., Bremerton
  - d. 3463 Kitsap Way, Bremerton

16. **49 CFR §192.479 Atmospheric corrosion control: General.**

- (a) *Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.*
- (b) *Coating material must be suitable for the prevention of atmospheric corrosion.*
- (c) *Except portions of pipelines in offshore splash zones or soil-to-air interfaces, the operator need not protect from atmospheric corrosion any pipeline for which the operator demonstrates by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will-*
  - (1) *Only be a light surface oxide; or*
  - (2) *Not affect the safe operation of the pipeline before the next scheduled inspection.*

**Finding(s):**

The following locations have above-ground uncoated piping.

1. 937/939 Callow, Bremerton
2. 641 Callow, Bremerton
3. Meter 289160 (Bakery on Callow, Bremerton)
4. 347 N Callow Ave., Bremerton - Meter 241073
5. W of 347 N Callow Ave., Bremerton W side of Alley - W. of Meter 241073
6. 339 N Callow Ave., Bremerton - Meter 244498
7. Meter 179895 (Wok on Fire)
8. 325 N Callow Ave., Bremerton - Meter 270409
9. 3201 NW Randall Way, Silverdale
10. 4303 Kitsap Way, Bremerton (Quality Inn) – Meterless riser on E. side of Laundry/Maintenance Bldg. off main driveway

17. **49 CFR §192.481 Atmospheric corrosion control: Monitoring**

(a) *Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:*

<u><i>If the pipeline is located:</i></u>	<u><i>Then the frequency of inspection is:</i></u>
Onshore	At least once every 3 calendar years, but with intervals not exceeding 39 months
Offshore	At least once each calendar year, but with intervals not exceeding 15 months

(b) *During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.*

(c) *If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479.*

**Finding(s):**

1. The following locations were found with damaged or missing interface coating:

- a. 9857 Silverdale Way, Silverdale – Meter 662198
- b. 2890 Ridgetop Blvd. NW, Silverdale – Meter 536533
- c. 4907 Auto Center Blvd., Bremerton – Meter 276858
- d. 4920 Auto Center Blvd., Bremerton
- e. 288 Wilkes, Bremerton
- f. 3519 Arsenal Rd., Bremerton – Double cut located near street

2. CNG atmospheric corrosion monitoring records are insufficient to demonstrate compliance. Records show the last atmospheric corrosion inspection occurred on the following dates thereby exceeding the required inspection frequency.

- |    |                     |          |
|----|---------------------|----------|
| a. | 3975 State Hwy 3 W  | 08.30.04 |
| b. | 3987 State Hwy 3 W  | 08.30.04 |
| c. | 6204 W State Hwy 3  | 08.30.04 |
| d. | 4121 State Hwy 16 W | 08.30.04 |
| e. | 4135 State Hwy 16 W | 08.30.04 |
| f. | 228 S Marion Ave.   | 12.21.05 |

18. **49 CFR §192.616 Public awareness.**

(a) *Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see § 192.7).*

- (b) *The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.*
- (c) *The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.*
- (d) *The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:*
  - (1) *Use of a one-call notification system prior to excavation and other damage prevention activities;*
  - (2) *Possible hazards associated with unintended releases from a gas pipeline facility;*
  - (3) *Physical indications that such a release may have occurred;*
  - (4) *Steps that should be taken for public safety in the event of a gas pipeline release; and*
  - (5) *Procedures for reporting such an event.*
- (e) *The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.*
- (f) *The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.*
- (g) *The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.*
- (h) *Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. The operator of a master meter or petroleum gas system covered under paragraph (j) of this section must complete development of its written procedure by June 13, 2008. Upon request, operators must submit their completed programs to PHMSA or, in the case of an intrastate pipeline facility operator, the appropriate State agency.*
- (i) *The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.*

**Finding(s):**

CNG did not have or did not provide staff with information regarding their public awareness program.

19. **49 CFR §192.743 Pressure limiting and regulating stations: Capacity of relief devices.**
- (a) *Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.*

- (b) *If review and calculations are used to determine if a device has sufficient capacity, the calculated capacity must be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates. After the initial calculations, subsequent calculations need not be made if the annual review documents that parameters have not changed to cause the rated or experimentally determined relieving capacity to be insufficient.*
- (c) *If a relief device is of insufficient capacity, a new or additional device must be installed to provide the capacity required by paragraph (a) of this section.*

**Finding(s):**

CNG records provided to staff as evidence of CNG's regulator and relief capacity review for 2007 and 2008 is incomplete. Records do not include equipment capacity data nor do they indicate whether capacity changes occurred in CNG's system.

**AREAS OF CONCERN OR FIELD OBSERVATIONS**

1. **49 U.S.C. 60132, Subsection (b).**  
CNG did not update National Pipeline Mapping System (NMPS) every 12 months indicating that no system modifications have occurred.
2. **49 CFR §192.615 Emergency plans.**  
CNG documentation identified that some manner of liaison with local officials had been completed. However, no frequency regarding the exchange of that information and the updating of required contact information has been established.
3. **49 CFR §192.709 Transmission lines: Record keeping.**  
Regulator Station #127 located on Old Belfair Hwy, Gorst was found with the relief valve flag tripped and the relief valve reading 3psig over the documented set pressure. This information was not recorded on the CNG Facility Maintenance & Inspection Record – Regulator Station form. The calibration date for the gauge used for this inspection was recorded as 12.11.09 but the date of the inspection (11.05.09) occurs chronologically before this date.

The Operation & Maintenance Request Form for R-127, dated 09.24.08, identifies the relief set pressure as 40 psig but the Regulator Station Facility Maintenance & Inspection Record form dated of the same date identifies the relief set pressure as 41psig.