STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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Ref. No. Docket PG-110017

CERTIFIED MAIL

September 20, 2011

Gary W. Kaiser
Vice President
Georgia Pacific Consumer Products (Camas) LLC
401 NE Adams Street
Camas, WA 98607

Dear Mr. Kaiser:

RE: 2011 Natural Gas Transmission Standard Inspection – Georgia Pacific Camas

The Washington Utilities and Transportation Commission (UTC) staff conducted a natural gas safety standard inspection on July 11-13 and July 18-20, 2011, of Georgia Pacific (GP) Camas District transmission pipeline system. The inspection included a review of records, procedures and pipeline facilities. Staff conducted a formal exit interview with GP-Camas on July 20, 2011, during which time GP-Camas reviewed the inspection findings.

Staff documented 33 state and federal safety code violations and 12 areas of concern (AOC). The AOC, which unless corrected, could lead to future violations of state or federal pipeline safety rules.

GP is responsible for ensuring that they are in full compliance with all applicable state and federal pipeline safety regulations and maintain and operate their pipeline system so that it is safe, reliable, and efficient.

The attached report presents staff's decisions regarding probable violations and does not constitute a finding of violation by the commission at this time. The report is not necessarily the position or opinion of the commission, should it be called upon to rule on these issues in an appropriate proceeding.

Your response needed
Please review the attached report and respond in writing by October 21, 2011.

What happens after you respond to this letter?
The attached report presents staff's decisions regarding probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Assess an administrative penalty under RCW 81.88.040, or
- Issue a complaint, seeking monetary penalties, changes in the company's, practices, or other relief authorized by law, and justified by the circumstances, or
- Consider the matter resolved without further commission action.

If you have any questions, please contact Stephanie Zuehlke, Pipeline Safety Engineer at (360) 664-1318. Please refer to docket number PG-110017 in any future correspondence regarding this inspection.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

David D. Lykken
Pipeline Safety Director

Enclosure

cc. Steve Ringquist, Reliability Leader, GP
Roy Rogers, Consultant Cathodic Protection Engineering, Inc.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2011 Natural Gas Pipeline Safety Inspection
Georgia Pacific – Camas
Docket PG-110017

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 Georgia Pacific (GP) – Camas. 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 480-93-015 Odorization of gas.**

   (4) Each gas pipeline company must follow the odorant testing instrument manufacturer's recommendations for maintaining, testing for accuracy, calibrating and operating such instruments. When the manufacturer does not provide a recommendation, each gas pipeline company must conduct accuracy checks and calibrate such instruments at least once annually, if the instrument is outside specified tolerances.

   (5) Each gas pipeline company must keep all records of odorant usage, sniff tests performed, and odorant testing instrument calibration for five years.

   Finding(s):
   GP failed to provide annual calibration records for their Heath Odorator for 2009.

2. **WAC 480-93-017 Filing requirements for design, specification, and construction procedures.**

   (2) Except in an emergency, a gas pipeline company must submit to the commission for review, at least forty-five days prior to construction, any construction plans that do not conform with a gas pipeline company's existing and accepted construction procedures, designs, and specifications on file with the commission.

   Finding(s):
   GP's April 2010 construction design and specifications failed to conform to their existing and accepted construction procedures, design, and specifications. Example: GP procedures Section 4.6 Materials, requires a minimum fitting grade specification of Y-52 fittings. GP's design and construction records both specify Y-42 fittings for the April 2010 SR-14 transmission pipeline project.

3. **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.

(2) *Each gas pipeline company must give the commission access to records for review during an inspection and must provide the commission copies of records upon request.*

(3) *Each gas pipeline company must maintain a list of forms and data bases, including examples where applicable, that specify what records the company maintains. Each gas pipeline company must make this list available to the commission upon request.*

(4) *Each gas pipeline company must record and maintain records of the actual value of any required reads, tests, surveys or inspections performed. The records must include the name of the person who performed the work and the date the work was performed. The records must also contain information sufficient to determine the location and facilities involved. Examples of the values to be recorded include, but are not limited to, pipe to soil potential reads, rectifier reads, pressure test levels, and combustible gas indicator reads. A gas pipeline company may not record a range of values unless the measuring device being used provides only a range of values.*

(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.*

(6) *If a gas pipeline company believes a record provided to the commission is confidential as that term is defined in WAC 480-07-160(2), the gas pipeline company must follow the procedures in WAC 480-07-160 for designating and treating that record as confidential.*

1. **Finding (s):**
GP failed to provide records which demonstrate their pipeline contractor employees from Alaska Continental Pipeline Company complied with the operator qualifications required by WAC 480-93-018 for the SR-14 construction project on their transmission line in 2010.

2. **Finding(s):**
GP failed to maintain records which identify their non-destructive testing contractor employees from Oregon Washington Laboratories complied with the operator qualifications required by WAC 480-93-018 for the SR-14 construction project on their transmission line in 2010. GP only obtained copies of these records from their contractor during the inspection at staff's request.

3. **Finding(s):**
GP failed to provide accurate construction records detailing the line pipe ordered and used for the construction of SR-14 transmission line project in 2010. Construction records do not clearly identify line pipe details such as wall thickness, diameter, and pipe grade.

4. **Finding(s):**
GP failed to provide records showing that they jeeped their SR-14 transmission line project.

5. **Finding(s):**
GP failed to provide staff with a copy of their annual report. Staff requested GP's annual report multiple times for review during the inspection.

6. **Finding(s):**
GP failed to keep accurate design, construction, and/or installation records for their SR-14 pipeline project. GP's Design Documents dated 04.14.10, Construction Notification Filing with the Commission dated 04.06.10, and Construction and installation records vary as to the pipe grade, wall thicknesses, pipe diameter, %SMYS, testing, etc. Examples follow:

a. **04.14.10 Design Document and post-construction records identify:**
   i. Replacement pipeline
      1. Grade X-42 yet GP incorrectly defined a yield strength of 52,000psi
      2. Operating at 26.9%SMYS [staff notes w/X-42 pipe it is operating at over 33%SMYS]
      3. Hydrostatically tested to 1363 psi at 46%SMYS [staff notes w/X-42 pipe it was tested to 57%SMYS]
      4. Design document was not compiled until the date of the hydrostatic test
      5. Use of an unapproved welding procedure specification No. GP CAMAS-01

b. **04.06.10 GP notification of construction letter to commission state:**
   i. Existing pipeline
      1. Grade X-42,
      2. 10 diameter pipe,
      3. 0.307 wall thickness,
      4. Hydrostatically tested to 1200psi,
      5. Design press. of 800psi.,
      6. Class III,
      7. MAOP 250
   ii. Replacement pipeline
      1. Identical materials as existing pipe,
      2. Hydrostatically testing to 1200psi,
      3. 100% x-ray,
      4. Normal operating pressure of 235psi
   iii. Approved welding procedure specification No. GP CAMAS-01

c. **03.01.10 GP Construction Documents state:**
   i. Materials provided by GP and staged within 1 mile of project site:
      1. API 5L, 10"dia, .307 wt (or .365 wt) grade X-42 pipe. 40ft joint length, QTY 364ft.
      2. Hydrostatically tested to 1363psi

7. **Finding(s):**
GP failed to provide records identifying their contact and liaison program information with public officials for the purposes of meeting 49 CFR §192.615 and .603 requirements.

8. **Finding(s):**
GP failed to provide records which evidence the content and delivery of their Public Awareness stakeholder messages.

9. **Finding(s):**
GP failed to update their maps within 6 months of when it completed any construction activity. GP completed construction on SR-14 occurred in April 2010. Maps were not updated as of July 21, 2011.

10. **Finding(s):**
GP failed to record their Odorator calibration and periodic test in accordance with Section 3 Appendix B Calibration and Periodic Test Records.

11. **Finding(s):**
GP failed to maintain their valve inspection records for 2008, 2009, 2010 and 2011, in accordance with WAC 480-93-018. Records provided for staff review were summaries. No inspection records recorded at the time of inspection were available.

4. **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.

1. **Finding(s):**
GP failed to provide recalibration records for their multi-meters for the calendar years 2009, 2010, and 2011.

2. **Finding(s):**
GP failed to provide accuracy check records for their copper/copper sulfate half-cells for the calendar years 2009, 2010, and 2011.

5. **WAC 480-93-110 Corrosion control.**
(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):
Since 1993, GP has failed to inspect and/or monitor for atmospheric corrosion beneath 4 metallic pipe supports located at their SR-14 Williams Pipeline West Metering Station and Pig launcher access at the Mill End of the transmission pipeline. Three supports were removed for inspection in July 2011. As of July 20, 2011, one support has yet to be removed. The corrosion inspector, R.R. identified he measured a minor amount of pipe loss but failed to document this inspection and pipe loss measurement.

6. **WAC 480-93-160 Reporting requirements of proposed construction.**

(1) Each gas pipeline company must file a proposed construction report with the commission at least forty-five days prior to construction or replacement of any segment of a gas transmission pipeline equal to or greater than one hundred feet in length. Emergency repairs are exempt from this section.

Finding(s):
GP failed to file their proposed construction report with the commission at least forty-five days prior to the replacement of their transmission pipeline running parallel to SR-14 in Camas. GP's report is dated April 6, 2010; report was received by the commission on April 9, 2010. GP construction records identify that construction began as early as April 9, 2010. This replacement was not an emergency.

7. **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. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

(2) The manual must be filed with the commission forty-five days prior to the operation of any gas pipeline. Each gas pipeline company must file revisions to the manual with the commission annually. The commission may, after notice and opportunity for hearing, require that a manual be revised or amended. Applicable portions of the manual related to a procedure being performed on the pipeline must be retained on-site where the activity is being performed.

(3) The manual must be written in detail sufficient for a person with adequate training to perform the tasks described. For example, a manual should contain specific, detailed, step-by-step instructions on how to maintain a regulator or rectifier, conduct a leak survey or conduct a pressure test.

1. **Finding(s):**
GP failed to record details of their leaks and leak investigations for 2008, 2009, and 2010. Form titled O&M Manual, Gas Leak and Repair Report was to be used for recording this data in accordance with GP procedures.

2. **Finding(s):**
GP failed to follow their Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(1) Contractor Monitoring – Qualifying Potential Contractor(s). GP did not have records or documentation showing that their contractor's and/or sub-contractor's AMPP were submitted and did not review them prior to allowing them to become eligible to bid on company contract work and prior to completing the performance of a covered function. This particular section of the manual requires GP to have provided written correspondence to the contractor(s) to advise them whether or not their AMPP plan is acceptable or in need of further additions, deletions, revisions, or clarifying language.

a. Alaska Continental Pipeline Company
b. Oregon Washington Laboratories
c. R.L.D., Construction and Welding Inspector
d. R.R., Principal Engineer of Cathodic Protection Engineering, Inc.

3. **Finding(s):**
GP failed to follow their Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(2) Contractor Monitoring – Monitoring Contractor's Compliance. GP did not have records or documentation showing that contractors and/or sub-contractors provided information on their employees who will perform covered functions for the operator.

a. Alaska Continental Pipeline Company
b. Oregon Washington Laboratories
c. R.L.D., Construction and Welding Inspector

4. **Finding(s):**
GP failed to follow their Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(4) Contractor Monitoring – Statistical Record Retention. GP failed to maintain a complete file on each contractor(s) statistical alcohol testing data reports.

a. Alaska Continental Pipeline Company
b. Oregon Washington Laboratories
c. R.R., Contractor and Principal Engineer of Cathodic Protection Engineering, Inc.

5. **Finding(s):** *(Repeat probable violation from docket PG-080098)*
GP failed to update their O&M manual with the correct API 1104 reference. GP's June 30, 2011, O&M manual Sections 4.0 Reference Codes, 4.7.3 Welder Qualifications, and 4.8 Testing NDT, reference the API 1104 19th Edition. The correct reference is API 1104, "Welding of Pipelines and Related Facilities" 20th edition, October 2005, errata/addendum, (July 2007) and errata 2 (2008) which replaced API 1104 19th edition, 1999, including errata October 31, 2001. The effective date of this final rule is October 1, 2010.

As a result of GP's September 2008 inspection, staff notified GP, "It is the responsibility of the company to ensure that company welding procedures and welders are qualified to the most current referenced standard before performing welding activities on the GP Camas Mill pipeline."

6. **Finding(s):**
GP failed to follow their procedures in Section 4.6 Materials which requires a minimum fitting grade specification Y-52. GP's design documents and construction documents both specify Y-42 fittings for the April 2010 SR-14 transmission pipeline project.

7. **Finding(s):**
GP failed to follow their procedures regarding contractor requirements for Permanent Repairs in Section 4 of Appendix dated 04.09.09 which requires GP to review, approve, and maintain OQ records/documentation. GP failed to provide evidence of compliance.

8. **Finding(s):**
GP failed to follow their Section 11.0 Radiographic Procedures Details dated 04.09.09, which requires GP to provide their radiographer with all necessary information regarding materials to be radiographed. The radiographers have identified the SR-14 pipeline project with an undetermined grade of pipe with varying pipe outside diameters (10, 10.5, and 1.75), and varying wall thicknesses ranging from (.307 to .365). Varying wall thicknesses were welded together with no records or procedures identifying measured tolerances.

9. **Finding(s):** *(Repeat probable violation PG-080098)*
GP failed to update their procedures with the correct API Standard 1104, "Welding of Pipelines and Related Facilities" (20th Edition, October 2005, errata/addendum, (July 2007) and errata 2 (2008)). The effective date of the 20th edition is October 1, 2010.

10. **Finding(s):**
GP failed to follow their procedure Section 4.16 by not filing a proposed construction report with the commission at least forty-five days prior to construction or replacement of their transmission pipeline.

11. **Finding(s):**
GP did not file procedural manual revisions with the commission annually. No updates were provided for 2010. GP made revisions to their procedural manual in 2010.

12. **Finding(s):**
GP failed to record their Odorator periodic test records every 30 days and annually (re-calibration requirement) in accordance with GP Procedures Section 3 Appendix B Calibration and Periodic Test Records.

13. **Finding(s):**
GP failed to follow their procedure OQ-006 for patrolling. Patrolling records are in a summary format and actual patrol inspection records were not available. All items to be reviewed during patrolling were not included in the summary leaving no way to verify whether all items were reviewed during patrols conducted in January 2010 and February 2010.

14. **Finding(s):**
GP failed to use the Valve Inspection and Repair Form required by procedure Section 3.1.5 Valve Inspection Form. "One form is to be completed for each valve, each time it is inspected, repaired, or replaced . . ."

15. **Finding(s):**
GP failed to follow PA Program Procedure 10.0 Program Documentation and Record Keeping. GP failed to provide records that show the completion of their Public Awareness Program Evaluation occurred on or prior to June 20, 2010.

16. **Finding(s):**
GP failed to follow PA Program Procedure 11.0 Program Evaluation. GP failed to provide records or documentation to support their PA program effectiveness conclusions.

8. **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. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

(2) The manual must be filed with the commission forty-five days prior to the operation of any gas pipeline. Each gas pipeline company must file revisions to the manual with the commission annually. The commission may, after notice and opportunity for hearing, require that a manual be revised or amended. Applicable portions of the manual related to a procedure being performed on the pipeline must be retained on-site where the activity is being performed.

(3) The manual must be written in detail sufficient for a person with adequate training to perform the tasks described. For example, a manual should contain specific, detailed, step-by-step instructions on how to maintain a regulator or rectifier, conduct a leak survey or conduct a pressure test.

1. **Finding(s):**
GP's procedures failed to detail step-by-step instructions and/or to reference the manufacturer's procedures for the installation of Plidco fittings/clamps for welded (permanent repair) and non-welded installations.

2. **Finding(s):**
GP does not have a procedure for jeeping, calibration of the jeeping equipment, and the documentation (Forms) and record requirements.

3. **Finding(s):**
GP does not have a procedure for the review and acceptance criteria of hydrostatic tests.

4. **Finding(s):**
GP does not have a procedure establishing minimum cover requirements.

5. **Finding(s):**
GP does not have a procedure identifying the pressure testing equipment they use and the calibration frequency requirements for that equipment. Their Procedure 4.8(7) and (8) only mimic's WAC 480-93-170(10) for procedures dated April 9, 2009, and June 30, 2011.

6. **Finding(s):**
GP's procedural manual fails to identify which records they will retain for the purposes of proving their compliance with their Damage Prevention Program including a list of excavators and the public in the vicinity of their pipeline.

7. **Finding(s):**
GP's procedures fail to include sufficient detail required for administering, contacting and completing their liaison program with public officials. For those public officials that are continually invited but will not attend a meeting, PHMSA Office of Pipeline Safety has suggested that compliance can be demonstrated through documentation of records such as, a roster of invited entities, meeting minutes, an attendance list and return receipts indicating the minutes were sent to those not attending.

8. **Finding(s):**
GP's procedures do not identify recalibration intervals/requirements for their odorant testing equipment.

9. **Finding(s):**
GP does not have a procedure to ensure the replacement of damaged or missing pipeline markers occurs within 45 days from the date of notification.

10. **Finding(s):**
GP does not have a procedure for checking the accuracy and calibration of their half-cells.

11. **Finding(s):**
GP's atmospheric corrosion control procedures Section 3.3.6.4 failed to include sufficient detail and clear and concise direction for conducting, remediating,

monitoring and recording pipeline atmospheric corrosion control inspections/issues. GP also failed to include remediation time frames.

12. **Finding(s):**
GP procedures Section 3.3.7 failed to include sufficient detail and clear and concise direction required for conducting remediation of atmospheric corrosion control. GP also failed to include remediation time frames.

13. **Finding(s):**
GP failed to correct their IMP procedures Section 8.7 Preventative and Mitigative Measures after the disconnection of remote controlled shut-off valves on February 24, 2009.

9. **WAC 480-93-185 Gas leak investigation.**

(1) Each gas pipeline company must investigate any odor, leak, explosion, or fire, which may involve its gas pipelines, promptly after receiving notification. Where the investigation reveals a leak, the gas pipeline company must grade the leak in accordance with WAC 480-93-186, and take appropriate action. The gas pipeline company must retain the leak investigation record for the life of the pipeline.

(2) In the event of an explosion, fire, death, or injury, the gas pipeline company must not remove any suspected gas facility until the commission or the lead investigative authority has designated the release of the gas facility. Once the situation is made safe, the gas pipeline company must keep the facility intact until directed by the lead investigative authority.

(3) When leak indications are found to originate from a foreign source (for example, a gasoline tank, a sewer, a marsh or customer-owned piping), and the situation is ongoing and potentially hazardous, the gas pipeline company must:

(a) Take appropriate action regarding its own facilities to protect life and property; and

(b) Report the leak promptly to the source facility owner or operator and, where appropriate, to the police department, fire department, or other appropriate governmental agency. If the property owner or an adult person occupying the premises is not available, the gas pipeline company must, within twenty-four hours of the leak investigation, send by first-class mail, addressed to the person occupying the premises, a letter explaining the results of the investigation. The gas pipeline company must keep a record of each letter sent for five years.

Finding (s):
GP failed to retain leak investigation records (for the life of the pipeline) for foreign leaks and the detail necessary to verify that gas detected during their annual leak surveys originated from a foreign source on October 25, 2008, September 19, 2009, and October 2, 2010, or October 16, 2010 (exact survey date unknown).

10. **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.

(2) Each gas pipeline company must establish a procedure for evaluating the concentration and extent of gas leakage. When evaluating any leak, the gas pipeline company must determine and document the perimeter of the leak area. If the perimeter of the leak extends to a building wall, the gas pipeline company must extend the investigation inside the building. Where the reading is in an unvented, enclosed space, the gas pipeline company must consider the rate of dissipation when the space is ventilated and the rate of accumulation when the space is resealed.

(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.

(4) Grade 1 and 2 leaks can only be downgraded once to a Grade 3 leak without a physical repair. After a leak has been downgraded once, the maximum repair time for that leak is twenty-one months.

Finding(s):

GP failed to use a CGI for leaks discovered during their annual leak surveys conducted in October 25, 2008, September 19, 2009, and October 2, 2010 or October 16, 2010 (exact survey date unknown).

11. **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):
GP failed to record the magnitude and/or location of CGI reads taken during leak investigations on October 25, 2008, September 19, 2009, and October 2, 2010, or October 16, 2010 (exact date unknown).

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

(2) Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.

(5) Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:
(a) Description of the system and area surveyed (including maps and leak survey logs);
(b) Survey results;
(c) Survey method;
(d) Name of the person who performed the survey;
(e) Survey dates; and
(f) Instrument tracking or identification number.

Finding(s):
GP's leak survey records failed to include maps for the following annual leak survey inspections which occurred on October 25, 2008, September 19, 2009, and October 2, 2010 or October 16, 2010, (exact date unknown).

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

(6) Each gas pipeline company must perform self audits of the effectiveness of its leak detection and recordkeeping programs. Each gas pipeline company must maintain records of the self audits for five years. Self audits must be performed as frequently as necessary, but not to exceed three years between audits. At a minimum, self audits should ensure that:

(a) *Leak survey schedules meet the minimum federal and state safety requirements for gas pipelines;*
(b) *Consistent evaluations of leaks are being made throughout the system;*
(c) *Repairs are made within the time frame allowed;*
(d) *Repairs are effective; and*
(e) *Records are accurate and complete.*

Finding(s):
GP failed to perform effective self-audits ensuring their records were accurate and complete. GP procedures specify they use leak investigation forms titled "O&M Manual, Gas Leak and Repair Report" GP failed to use these forms. Other records did not contain the detail necessary to determine compliance.

14. **49 CFR §192.105 Design formula for steel pipe.**

(a) *The design pressure for steel pipe is determined in accordance with the following formula:*

$$P = (2\ St/D) \times F \times E \times T$$

P = Design pressure in pounds per square inch (kPa) gage.
S = Yield strength in pounds per square inch (kPa) determined in accordance with §192.107.
D = Nominal outside diameter of the pipe in inches (millimeters).
t = Nominal wall thickness of the pipe in inches (millimeters). If this is unknown, it is determined in accordance with §192.109. Additional wall thickness required for concurrent external loads in accordance with §192.103 may not be included in computing design pressure.
F = Design factor determined in accordance with §192.111.
E = Longitudinal joint factor determined in accordance with §192.113.
T = temperature derating factor determined in accordance with §192.115.

Finding(s):
GP failed to complete their design calculations in accordance with this regulation. The pipe grade used for their SR-14 has been specified as X-42 but the yield strength in psi used in the formula is 52,000 psi.

PHMSA Interpretation 192.105 - 6 dated July 25, 1973, states, "As stated in §192.101, Subpart C prescribes minimum requirements for the design of pipe. If the formula of §192.105(a) is not used, the requirements are not being met. Whenever design pressure for steel pipe must be calculated for use in connection with any of the Federal gas pipeline safety standards, it must be determined as a regulatory matter in accordance with the formula given in §192.105(a). Any substitution of expressions which are at variance with those given in the formula will not result in values for design pressure which can be used for purposes of the regulations."

15. **49 CFR §192.225 Welding Procedures.**

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

1. **Finding(s):**
GP failed to qualify their welding procedures in accordance with CFR §192.225. The welding procedure qualification records do not contain required information for essential variables, such as travel time, time lapse between passes, and valid pre-heat requirements. Example: pre-heat requirements are identified as "Ambient to >50°F" and "Ambient to >75°F".

2. **Finding(s):**
GP construction documents contain a welding procedure WPS GP CAMAS-01 dated 09.19.02. This welding procedure is not identified as a qualified welding procedure in the GP procedures manual. GP failed to provide records evidencing this procedure as a qualified welding procedure.

16. **49 CFR §192.227 Qualification of Welders**

(a) Except as provided in paragraph (b) of this section, each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see § 192.7) or section IX of the ASME Boiler and Pressure Vessel Code (incorporated by reference, see § 192.7). However, a welder qualified under an earlier edition than listed in § 192.7 of this part may weld but may not re-qualify under that earlier edition.

(b) A welder may qualify to perform welding on pipe to be operated at a pressure that produces a hoop stress of less than 20 percent of SMYS by performing an acceptable test weld, for the process to be used, under the test set forth in section I of Appendix C of this part. Each welder who is to make a welded service line connection to a main must first perform an acceptable test weld under section II of Appendix C of this part as a requirement of the qualifying test.

Finding(s):
GP failed to provide records showing qualification of welders for CFR 192.227. The welder qualification test report records for Alaska Continental Pipeline employee with the initials P.H. show:

a. GP failed to complete the welder qualification process for this welder until well after the completion of the SR-14 pipeline construction project.

i. The welder qualification test was taken on 04.09.10
ii. The welder qualification test was not NDT completed and reviewed until 04.23.10

b. GP failed to identify a qualified procedure used.
c. GP failed to include face/root bend and nick break test details.
d. GP failed to include essential variables:
   i. Travel time
   ii. Pre-heat temperatures
   iii. Time lapse between passes

17. **49 CFR §192.241 Inspection and test of welds.**

(a) Visual inspection of welding must be conducted by an individual qualified by appropriate training and experience to ensure that:
(1) The welding is performed in accordance with the welding procedure; and
(2) The weld is acceptable under paragraph (c) of this section.

Finding(s):

GP failed to provide records evidencing that the following people completing visual inspection of welding on GP's April 2010 SR-14 construction project were qualified to visually inspect welds:

a. R.L.D., GP's Contract Welding and Construction Inspector
b. P.H., Alaska Continental Pipeline Employee

18. **49 CFR §192.515 Environmental protection and safety requirements.**

(a) In conducting tests under this subpart, each operator shall insure that every reasonable precaution is taken to protect its employees and the general public during the testing. Whenever the hoop stress of the segment of the pipeline being tested will exceed 50 percent of SMYS, the operator shall take all practicable steps to keep persons not working on the testing operation outside of the testing area until the pressure is reduced to or below the proposed maximum allowable operating pressure.
(b) The operator shall insure that the test medium is disposed of in a manner that will minimize damage to the environment.

Finding(s):

GP construction documents do not indicate that additional steps were taken to protect its employees and the general public in the testing area until the pressure was reduced to or below the proposed MAOP of 250 psi. Design and construction records identify (in multiple locations) that the tested pipe installed was grade X-42 and not X-42/X-52. Given a yield strength (S) of 42,000 psi, pipe diameter (D) of 10.75, and a wall thickness (t) of .307 inches, GP exceeded 50% SMYS and with a hydrostatic test conducted at 1363 psi. (50% SMYS = 1199 psi)

19. **49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies.**

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Finding(s):

GP exceeded the review and update frequency interval for their manuals from March 2009 to December 2010.

20. **49 CFR §192.614 Damage prevention program.**

(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.

Finding(s):

GP's Natural Gas Pipeline Maintenance, Operations, and Procedures Manual Damage Prevention Section 3.7 failed to identify a current list of excavators.

21. **49 CFR §192.614 Damage prevention program.**

(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

(2) Provides for notification of the public in the vicinity of the pipeline and actual notification of the persons identified in paragraph (c)(1) of this section of the following as often as needed to make them aware of the damage prevention program:

(i) The program's existence and purpose; and

(ii) How to learn the location of underground pipelines before excavation activities are begun.

Finding(s):

GP's Natural Gas Pipeline Maintenance, Operations, and Procedures Manual under Section 3.7 Damage Prevention failed to identify the public located in the vicinity of the pipeline.

22. **49 CFR §192.615 Emergency plans.**

(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:

(1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;

(2) *Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;*

(3) *Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,*

(4) *Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.*

Finding(s):

GP failed to identify those public officials that it liaisons with and the liaison frequency.

23. **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.

1. **Finding(s):**
GP failed to implement and deliver their baseline message information in accordance with their written program. Although notification was provided on 03.16.09, GP identified the following stakeholder audiences were not provided all of the information content described under Section 7.1 Determination of Message Type and Content for Each Stakeholder Group. There are no records documenting this notification other than a USPS mailing receipt.

   a. Section 7.1.1 The Effected Public
   b. Section 7.1.2 State and Local Emergency Services
   c. Section 7.1.3 Local Public Officials and Governing Councils
   d. Section 7.1.4 Excavation Contractors
      i. Northwest Natural Gas Pipeline Company is not included in this listing
      ii. Williams Pipeline Company is not included in this listing

2. **Finding(s):**
GP failed to provide records that show the completion of their Public Awareness Program Evaluation occurred on or prior to June 20, 2010. They failed to follow PA Program Procedure 10.0 Program Documentation and Record Keeping.

3. **Finding(s):**
GP failed to provide records or documentation to support their PA program effectiveness conclusions. They failed to follow PA Program Procedure 11.0 Program Evaluation.

24. **49 CFR §192.805 Qualification program.**
Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) Identify covered tasks;

(b) Ensure through evaluation that individuals performing covered tasks are qualified;

(c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;

(d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191;

(e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;

(f) Communicate changes that affect covered tasks to individuals performing those covered tasks; and

(g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed.

Finding(s):

GP failed to provide documentation to show that they had completed an evaluation process to qualify and/or to determine the qualifications of their pipeline Construction and Welding Inspector, R.L.D. and his ability to perform covered tasks, including but not limited to welding inspection, welder qualification testing, and depth of cover.

25. **49 CFR §192.807 Recordkeeping.**

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

(1) Identification of qualified individual(s);

(2) Identification of the covered tasks the individual is qualified to perform;

(3) Date(s) of current qualification; and

(4) Qualification method(s).

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

1. **Finding(s):**

GP did not have the following records that demonstrate operator qualification compliance for their pipeline contractor, Alaska Continental Pipeline Company. GP records list the names of 12 employees for this company.

a. Identification of the qualified individuals
b. Identification of the covered tasks the individual is qualified to perform
c. Date(s) of current qualifications
d. Qualification method

2. **Finding(s):**

GP did not have the following records that demonstrate operator qualification compliance for their non-destructive testing contractor, Oregon Washington Laboratories. GP records list the names of 2 employees for this company.

a. Identification of the qualified individuals
b. Identification of the covered tasks the individual is qualified to perform
c. Date(s) of current qualifications
d. Qualification method

3. **Finding(s):**
GP did not have the following records that demonstrate operator qualification compliance for their construction inspector, R. D., who performed covered functions.

a. Identification of the qualified individuals
b. Identification of the covered tasks the individual is qualified to perform
c. Date(s) of current qualifications
d. Qualification method

26. **49 CFR §192.905 How does an operator identify a high consequence area?**

(a) General. To determine which segments of an operator's transmission pipeline system are covered by this subpart, an operator must identify the high consequence areas. An operator must use method (1) or (2) from the definition in § 192.903 to identify a high consequence area. An operator may apply one method to its entire pipeline system, or an operator may apply one method to individual portions of the pipeline system. An operator must describe in its integrity management program which method it is applying to each portion of the operator's pipeline system. The description must include the potential impact radius when utilized to establish a high consequence area. (See appendix E.I. for guidance on identifying high consequence areas.)

Finding(s):
GP failed to extend their existing HCA area to coincide with the relocation/replacement of their 10" transmission pipeline located near SR-14 and Union St., Camas.

27. **49 CFR §192.935 What additional preventive and mitigative measures must an operator take?**

(a) General requirements. An operator must take additional measures beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area. An operator must base the additional measures on the threats the operator has identified to each pipeline segment. (See § 192.917) An operator must conduct, in accordance with one of the risk assessment approaches in ASME/ANSI B31.8S (incorporated by reference, see § 192.7), section 5, a risk analysis of its pipeline to identify additional measures to protect the high consequence area and enhance public safety. Such additional measures include, but are not limited to, installing Automatic Shut-off Valves or Remote Control Valves, installing computerized monitoring and leak detection systems, replacing pipe segments with pipe of heavier wall thickness, providing additional training to personnel on response procedures, conducting drills with local emergency responders and implementing additional inspection and maintenance programs.

(c) Automatic shut-off valves (ASV) or Remote control valves (RCV). If an operator determines, based on a risk analysis, that an ASV or RCV would be an efficient means of adding protection to a high consequence area in the event of a gas release, an operator must install the ASV or RCV. In making that determination,

an operator must, at least, consider the following factors--swiftness of leak detection and pipe shutdown capabilities, the type of gas being transported, operating pressure, the rate of potential release, pipeline profile, the potential for ignition, and location of nearest response personnel.

4. **Finding(s):**
GP failed to conduct a re-evaluation of their risk analysis additional measures after the disconnection of remote controlled valves on February 24, 2009.

5. **Finding(s):**
GP failed to re-evaluate efficiency based upon changes in their shutdown capabilities, including response time, after the disconnection of their remote controlled valves on February 24, 2009.

28. **49 CFR §199.105 Drug tests required.**

(5) The selection of employees for random drug testing shall be made by a scientifically valid method, such as a random number table or a computer-based random number generator that is matched with employees' Social Security numbers, payroll identification numbers, or other comparable identifying numbers. Under the selection process used, each covered employee shall have an equal chance of being tested each time selections are made.

Finding(s):
GP failed to ensure all applicable personnel were included in a random drug testing pool.

a. GP failed to provide records showing their Construction and Welding Inspector, R.L.D., who performed covered tasks, was included in a selection pool.
b. GP failed to provide records showing GP employee, J.S., (who was evaluated and determined to be OQ qualified to perform covered tasks) was included in a random testing selection pool.

29. **49 CFR §199.113 Employee assistance program.**

(c) Training under each EAP for supervisory personnel who will determine whether an employee must be drug tested based on reasonable cause must include one 60-minute period of training on the specific, contemporaneous physical, behavioral, and performance indicators of probable drug use.

Finding(s):
GP did not have or did not provide reasonable cause training records for any of their supervisory personnel. GP identified the following supervisory positions subject to training:

a. Reliability Leader
b. North Side Maintenance Leader
c. Salaried personnel assigned to maintenance weekend duty

30. **49 CFR §199.115 Contractor employees.**

With respect to those employees who are contractors or employed by a contractor, an operator may provide by contract that the drug testing, education, and training required by this part be carried out by the contractor provided:

(a) The operator remains responsible for ensuring that the requirements of this part are complied with; and

(b) The contractor allows access to property and records by the operator, the Administrator, and if the operator is subject to the jurisdiction of a state agency, a representative of the state agency for the purpose of monitoring the operator's compliance with the requirements of this part.

1. **Finding(s):**

GP failed to provide and maintain records which identify that their pipeline contractor, Alaska Continental Pipeline Company, complied with the drug testing, education, and training required by this part during their construction of their transmission line in 2010. (Additionally, GP failed to provide records showing GP had made an arrangement with their consortium to maintain their information.)

2. **Finding(s):**

GP failed to maintain records which identify that their non-destructive testing contractor, Oregon Labs, complied with the drug testing, education, and training required by this part during their construction of their transmission line in 2010. (Additionally, GP failed to provide records showing GP had made an arrangement with their consortium to maintain their information.)

3. **Finding(s):**

GP failed to provide and maintain records which identify that their contractor, R. R., Principal Engineer of Cathodic Protection Engineering, Inc., complied with the drug testing, education, and training required by this part for 2009, 2010, and 2011. GP also failed to provide records showing GP had made an arrangement with their consortium to maintain their information.

4. **Finding(s):**

GP failed to provide and maintain records which identify that their pipeline construction inspector, R. L.D. (who performed covered tasks) complied with the drug testing, education, and training required by this part during the construction of their transmission line in 2010. Functions performed to replace or relocate an existing pipeline segment or to tie in a newly constructed pipeline to an existing pipeline involve operation or maintenance of an existing pipeline. Performance of regulated functions associated with such replacement, relocation, or tie-in subject this person to drug testing under Part 199.

31. **49 CFR §199.227 Retention of records.**

(6) Records related to education and training:

(i) Materials on alcohol misuse awareness, including a copy of the operator's policy on alcohol misuse.

(ii) Documentation of compliance with the requirements of §199.231.
(iii) Documentation of training provided to supervisors for the purpose of qualifying the supervisors to make a determination concerning the need for alcohol testing based on reasonable suspicion.
(iv) Certification that any training conducted under this subpart complies with the requirements for such training.

1. **Finding(s):**
GP failed to provide records showing training was provided to supervisors which qualify them to make a determination concerning the need for alcohol testing based on reasonable suspicion.

2. **Finding(s):**
GP failed to provide records certifying that training was conducted under CFR §199.227 which complies with the requirements for such training.

32. **49 CFR §199.241 Training for supervisors.**
Each operator shall ensure that persons designated to determine whether reasonable suspicion exists to require a covered employee to undergo alcohol testing under §199.225(b) receive at least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

Finding(s):
GP failed to provide records which identify that training was provided to any of their designated supervisory personnel qualifying them to make a determination concerning the need for alcohol testing based upon reasonable suspicion. GP identified the following supervisory positions are subject to training:

a. Reliability Leader
b. North Side Maintenance Leader
c. Salaried personnel assigned to maintenance weekend duty

33. **49 CFR §199.245 Contractor employees.**
(a) With respect to those covered employees who are contractors or employed by a contractor, an operator may provide by contract that the alcohol testing, training and education required by this subpart be carried out by the contractor provided:
(b) The operator remains responsible for ensuring that the requirements of this subpart and part 40 of this title are complied with; and
(c) The contractor allows access to property and records by the operator, the Administrator, any DOT agency with regulatory authority over the operator or covered employee, and, if the operator is subject to the jurisdiction of a state agency,

1. **Finding(s):**
GP failed to provide and maintain records which identify that their pipeline contractor employees from Alaska Continental Pipeline Company, complied with the alcohol testing, education, and training required by this part during the

construction of their transmission line in 2010. GP also failed to provide records showing GP had made an arrangement with their consortium to maintain their information.

2. **Finding(s):**
GP failed to provide and maintain records which identify that their non-destructive testing (NDT) contractor employees from Oregon Washington Laboratories, complied with the alcohol testing, education, and training required by this part during the construction of their transmission line in 2010. GP also failed to provide records showing GP had made an arrangement with their consortium to maintain their information.

3. **Finding(s):**
GP failed to provide and maintain records which identify that their contractor, R. R., Principal Engineer of Cathodic Protection Engineering, Inc., complied with the alcohol testing, education, and training required by this part for 2009, 2010, and 2011. R. R. identified he was part of a consortium but no records were provided or maintained by GP.

4. **Finding(s):**
GP failed to provide and maintain records which identify that their pipeline construction inspector, R. L.D. (who completed covered tasks), complied with the alcohol testing, education, and training required by this part during the construction of their transmission line in 2010.

AREAS OF CONCERN

1. **WAC 480-93-018 Records.**
GP leak survey records lack attention to accuracy/detail. Example: 2010 Annual Pipeline Leakage Inspection correspondence with GP is dated October 2, 2010, but describes the survey completion on October 16, 2010, with an attached FI calibration record dated October 11, 2010.

2. **WAC 480-93-110 Corrosion Control.**
GP Procedure 3.3.9 Remedial Action states that GP will make arrangements to correct the problem within 90 days. This procedure should be corrected to state remedial action shall be completed within 90 days.

3. **WAC 480-93-180 Plans and procedures.**
GP does not have detailed procedures for the acceptance/review and monitoring of hydrostatic tests.

4. **WAC 480-93-180 Plans and procedures.**
GP's Public Awareness Procedures Sections 2.1, 2.2, and 2.3 incorrectly references Section 3.4 Pipeline Marking Plan rather than the intended Section 2.4 Safety Considerations.

5. **WAC 480-93-185 Gas leak investigation.**
Correct GP Procedure 3.2.3 to include the "property owner or adult occupant" language in accordance with this rule.

6. **49 CFR §199.3 Definitions.**
GP's definition for "Operator" is incomplete under this regulation. Operator definition shall read as defined under this regulation: "Operator means a person who owns or operates pipeline facilities subject to part 192, 193, or 195 of this chapter."

7. **49CFR §192.105 Design formula for steel pipe.**
Records show that GP failed to design for their transmission pipeline until after they completed pipeline construction on 04.14.10. (Note: this is the same day (04.14.10) GP began their hydrostatic test on the pipeline.)

8. **49 CFR §192.225 Welding Procedures.**
Section IX of ASME (July 2007) requires Qualified Welding Procedures to be updated (without requiring re-qualification of the procedure) to reflect change in ownership and acceptance of the procedure. GP procedures identify James River Corp. as the company name.

9. **49 CFR §192.229 Limitations on welders.**
GP has not consistently re-qualified their own welders without exceeding the regulation mandated 6 calendar month time requirement. However, staff found no indication that GP employees welded on the pipeline.

10. **49 CFR §199.101 Anti-drug plan.**
GP failed to post their Alcohol Misuse and Anti-drug Plans in the manner identified in the plans. GP states the plans shall be posted, in their entirety, on various work location bulletin boards. GP identified that they will revise this language by removing the requirement to post the entire plan on bulletin boards. GP shall identify the exact location where their plans are displayed, notify all covered employees of this location and ensure that the location is accessible to these employees.

11. **49 CFR §199.202 Alcohol misuse plan.**
GP's Alcohol Misuse Prevention Plan IV(A)(1) Alcohol Tests Required – Pre-Employment Plan mimics the regulation. GP should correct their Plan by specifically identifying the optional pre-employment requirements they will apply under this regulation.

12. **WAC 480-93-110 Corrosion control.**

Each gas pipeline company must have a written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action.