Washington Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Records Review and Field Inspection

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Senior Engineer within 30 days from completion of the inspection.

Inspection Report			
Docket Number	PG-070010		
Inspector/Submit Date	12/4/2007		
Sr. Eng Review/Date	12/12/2007		
Operator Information			
Name of Operator:	Inland Empire Paper Co.	**OP ID #:**	117
Name of Unit(s):	Headquarters		
Records Location:	Spokane, WA		
Date(s) of Last (unit) Inspection:	10/5-6/2004	**Inspection Date(s):**	11/12/2007 to 11/15/2007

Inspection Summary:

Reviewed procedures and maintenance records from 2005 to present. Made field visits to all 3 regulator stations and both relief systems. Emergency valve located at Williams' tap was partially operated and various CP reads were taken along the system.

HQ Address:	**System/Unit Name & Address:**
3220 N Argonne Spokane, WA 99212-2099	Same
Co. Official: Wayne Anderson, President **Phone No.:** 509-924-1911 **Fax No.:** **Emergency Phone No.:**	**Phone No.:** **Fax No.:** **Emergency Phone No.:**

Persons Interviewed	Title	Phone No.
Kevin Davis	Superintendant	509-924-1911
Ray Allen	Consultant	509-467-3911

UTC staff conducted abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.

(check one below and enter appropriate date)

☐	Team inspection was performed (Within the past five years.) or,	**Date:**	
☒	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	**Date:**	11/15/2007

Washington Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Records Review and Field Inspection

GAS SYSTEM OPERATIONS			
Gas Supplier	William's Pipeline		
Number of reportable safety related conditions last year 0		Number of deferred leaks in system 0	
Number of non-reportable safety related conditions last year 0		Number of third party hits last year 0	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 1			
Operating Pressure(s):		**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:	811	811 see notes	170
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	no		

Pipe Specifications:			
Year Installed (Range)	1988	Pipe Diameters (Range)	4-inch
Material Type	steel	Line Pipe Specification Used	5L X42 Grade A
Mileage	3.5	SMYS %	6.4% SMYS
Supply Company		Class Locations	1-3

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 2, Feb 06) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq **Date Completed:**

	REPORTING RECORDS		S	U	N/A	N/C
1.	191.5	Telephonic reports to NRC (800-424-8802) **No reports since last inspection**			X	
2.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within **2 hours**) for events which; (eff 6/02/05)			X	
3.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization;			X	
4.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars;			X	
5.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas; (eff 6/02/05)			X	
6.	480-93-200(1)(d)	Results in the unintentional ignition of gas;			X	
7.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;			X	
8.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; (eff 6/02/05)			X	
9.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or			X	
10.	480-93-200(1)(h)	Results in the news media reporting the occurrence, even though it does not meet the criteria of (a) through (e) of this subsection.			X	
11.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within **24 hours**) for;			X	
12.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; (eff 6/02/05)			X	
13.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; (eff 6/02/05) **Out of service once in 2005. Dave Lykken was notified by phone.**	X			
14.	480-93-200(2)(c)	A pipeline or system operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or (eff 6/02/05)			X	
15.	480-93-200(2)(d)	A pipeline or system pressure exceeding the MAOP (eff 6/02/05)			X	
16.	191.15	Written incident reports; supplemental incident reports (DOT Form RSPA F 7100.2)			X	
17.	480-93-200(4)	Written incident reports (within 30 days); supplemental incident reports			X	
18.	480-93-200(5)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure (eff 6/02/05)			X	
19.	191.17(a)	Annual Report (DOT Form PHMSA F-7100.2-1)	X			
20.	480-93-200(6)(a)	To the Commission a copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety (eff 6/02/05)	X			
21.	480-93-200(6)(b)	Annual Damage Prevention Statistics Report (eff 6/02/05) **filed for 2006 after Dave Lykken called.**	X			
22.	480-93-200(6)(c)	Annual report on construction defects or material failures (eff 6/02/05) **filed for 2006 after Dave Lykken called.**	X			
23.	480-93-200(7)	Providing updated emergency contact information to the Commission and appropriate officials	X			
24.	480-93-200(8)	Providing daily construction and repair activities reports (eff 6/02/05)	X			
25.	480-93-200(9)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required (eff 6/02/05) **not submitted to us for 2005 or 2006,**		X		
26.	191.23	Safety related condition reports			X	
27.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports			X	

Documentation Reviewed:

Document Title	Document Number	Revision Date	Date Range Reviewed	Pct of Data Reviewed

Comments:

191.5 – no reports required
480-93-200(1-5) – no incidents requiring notification since last inspection
480-93-200(9) – did not submit MIS form to the Commission even though PHMSA required it (<50 employees)
191.23 – no safety related conditions
192.727(g) – no offshore

CONSTRUCTION RECORDS			S	U	N/A	N/C
28.	192.225	Test Results to Qualify Welding Procedures	X			
29.	192.227	Welder Qualification	X			
30.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables (eff 6/02/05)	X			
31.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 (eff 6/02/05)	X			
32.	480-93-115(3)	Sealing ends of casings or conduits on Transmission lines and main (eff 6/02/05) **no new casings since last inspection**				X
33.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services (eff 6/02/05)			X	
34.	192.241(a)	Visual Weld Inspector Training/Experience	X			
35.	192.243(b)(2)	Nondestructive Technician Qualification **relocate was done by a level 2 technician recommend that they add a procedure to record a copy of the NDT technicians qualifications**	X			
36.	192.243(c)	NDT procedures **all contractor recommend that IE keep a copy of the NDT procedures**	X			
37.	192.243(f)	Total Number of Girth Welds **fifteen welds were made on the re-locate**	X			
38.	192.243(f)	Number of Welds Inspected by NDT **100%**	X			
39.	192.243(f)	Number of Welds Rejected **no welds rejected**	X			
40.	192.243(f)	Disposition of each Weld Rejected **none**			X	
41.	192.303	Construction Specifications	X			
42.	192.325	Underground Clearance			X	
43.	192.327	Amount, Location, Cover of each Size of Pipe Installed			X	
44.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length (eff 6/2/05)			X	
45.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines [redacted] **verify pressure, did not meet 192.507 test requirements of a 1 hour leak test prior to the strength test. Review 6.09 test procedures in their at 1350 the line was stressed to 38.5% Need better test procedures if not using a contractor, no length specified**		X		
46.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers Recom or Operators schedule) eff 6/2/05 reviewed records for relocate **no calibration records testing was completed on August 25th and 26th of 2005. Approximately 240'**		X		
47.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig (eff 6/2/05)			X	
48.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig (eff 6/2/05)			X	
49.	192.455	Cathodic Protection	X			

Documentation Reviewed:

Document Title	Document Number	Revision Date	Date Range Reviewed	Pct of Data Reviewed

Comments:

480-93-115(3) – no new casings since last inspection
480-93-115(4) – no services
192.243(f) – no rejected welds
192.325 – no construction
192.327 – no construction
480-93-160(1) – no construction
480-93-170(3) – did not test appropriately (no leak test), poor procedures
480-93-170(10) – no procedures or calibration records
480-93-175(1) – nothing moved or lowered since last inspection
480-93-175(4) – nothing moved or lowered since last inspection

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
50.	192.16	Customer Notification (**Verification – 90 days – and Elements**)			X	
51.	192.603(b)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) .605(a)	X			
52.	192.603(b)	Abnormal Operations .605(c)			X	
53.	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3)	X			
54.	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8)	X			
55.	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4)			X	
56.	192.709	Damage Prevention (**Miscellaneous**) .614	X			
57.	192.709	Class Location Study (**If Applicable**) .609			X	
58.	192.603(b)	Location Specific Emergency Plan .615(b)(1)	X			
59.	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2)	X			
60.	192.603(b)	Employee Emergency activity review, determine if procedures were followed. .615(b)(3)			X	
61.	192.603(b)	Liaison Program with Public Officials .615(c)	X			
62.	192.603(b)	Public Awareness .616				X
63.	192.517	Pressure Testing do **with #45**	X			
64.	192.709	Maximum Allowable Operating Pressure (**MAOP**) .619	X			
65.	192.709	Odorization of Gas .625	X			
66.	480-93-015(2)	Monthly Odorant Testing (eff 6/02/05)	X			
67.	480-93-015(3)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) (eff 6/02/05) **calibrated in September 2007, no prior calibration record**		X		
68.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on (eff 6/02/05)			X	
69.	480-93-155(1)	Uprating of system MAOP to greater than 60 psig? Procedures and specifications submitted 45 days prior? (eff 6/02/05) **Can't uprate, maop is the same as the supplier**			X	
70.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained **no leaks, I reviewed all odor calls**	X			
71.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained			X	
72.	480-93-187	Gas Leak records **no leaks since operation**			X	
73.	480-93-188(1)	Gas Leak surveys	X			
74.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) eff 6/2/05 **Ultra-Trak no calibration records (provided b y consultant) CGI had good records (owned by IE)**		X		
75.	480-93-188(3)	Leak survey frequency **(Refer to Table Below)**	X			

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C

Business Districts (By 6/02/07)	**1/yr (15 months)**
High Occupancy Structures	**1/yr (15 months)**
Pipelines Operating ≥ 250 psig	**1/yr (15 months)**
Other Mains: CI, WI, copper, unprotected steel	**2/yr (7.5 months)**

76.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs			X	
77.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred			X	
78.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected			X	
79.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions			X	
80.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in			X	
81.	480-93-188(5)	Gas Survey Records	X			
82.	480-93-188(6)	Leak Survey Program/Self Audits			X	
83.	192.709	Patrolling **(Refer to Table Below)** .705	X			

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	**2/yr (7½ months)**	**1/yr (15 months)**
3	**4/yr (4½ months)**	**2/yr (7½ months)**
4	**4/yr (4½ months)**	**4/yr (4½ months)**

84.	192.709	Leak Surveys **(Refer to Table Below)** .706	X			

Class Location	Required	Not Exceed
1 and 2	**1/yr**	**15 months**
3	**2/yr**	**7½ months**
4	**4/yr**	**4½ months**

85.	192.603b/.727g	Abandoned Pipelines; Underwater Facility Reports .727			X	
86.	192.709	Compressor Station Relief Devices **(1 per yr/15 months)** .731(a)			X	
87.	192.709	Compressor Station Emergency Shutdown **(1 per yr/15 months)** .731(c)			X	
88.	192.709	Compressor Stations – Detection and Alarms **(Performance Test)** .736(c)			X	
89.	192.709	Pressure Limiting and Regulating Stations **(1 per yr/15 months)** .739	X			
90.	192.709	Pressure Limiting and Regulator Stations – Capacity **(1 per yr/15 months)** .743	X			
91.	192.709	Valve Maintenance **(1 per yr/15 months)** .745	X			
92.	192.709	Vault Maintenance **(≥200 cubic feet)(1 per yr/15 months)** .749			X	
93.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751			X	
94.	192.603(b)	Welding – Procedure .225(b)	X			
95.	192.603(b)	Welding – Welder Qualification .227/.229	X			
96.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2)	X			
97.	192.709	NDT Records **(Pipeline Life)** .243(f)	X			
98.	192.709	Repair: pipe **(Pipeline Life)**; Other than pipe **(5 years)**			X	

Documentation Reviewed:				
Document Title	**Document Number**	**Revision Date**	**Date Range Reviewed**	**Pct of Data Reviewed**

Comments:

191.17 – repeat of #19
192.16 – no customers
192.603(b) – no abnormal operations since last inspection
192.603(b) – review of procedures – no abnormal operations since last inspection
192.709 – not high enough SMYS
192.603(b) – emergency procedures review – no emergencies since last inspection
192.603(b) – public awareness reviewed during another inspection
480-93-015(3) – equipment not calibrated per manufacturer – no procedures
480-93-140(2) – no services
480-93-155(1) – can't uprate – supplier and operator at same MAOP
480-93-185(3) – no leaks
480-93-187 – no leaks
480-93-188(2) – equipment not calibrated per manufacturer – no procedures
480-93-188(4)(a-e) – no special leak surveys required since last inspection
480-93-188(6) – no leaks
192.603b/.727g – no abandoned facilities
192.709 – no compression, vaults or repairs

CORROSION CONTROL RECORDS			S	U	N/A	N/C
99.	192.491	Maps or Records .491(a)	X			
100.	192.491	Examination of Buried Pipe when Exposed .459 **exposed in August of 2005 when the line was re-located.**	X			
101.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed (eff 6/02/05)	X			
102.	192.491	Annual Pipe-to-soil Monitoring **(1 per yr/15 months)** .465(a)	X			
103.	192.491	Rectifier Monitoring **(6 per yr/2½ months)** .465(b)	X			
104.	192.491	Interference Bond Monitoring – Critical **(6 per yr/2½ months)** .465(c)			X	
105.	192.491	Interference Bond Monitoring – Non-critical **(1 per yr/15 months)** .465(c)			X	
106.	192.491	Prompt Remedial Actions .465(d)				
107.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas **(1 per 3 cal yr/39 months)** .465(e)			X	
108.	192.491	Electrical Isolation **(Including Casings)** .467	X			
109.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months (eff 6/02/05)	X			
110.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods (eff 6/02/05)			X	
111.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days (eff 6/02/05)			X	
112.	480-93-110(5)(c)	Casing shorts cleared when practical (eff 6/02/05)			X	
113.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months (eff 6/02/05)			X	
114.	192.491	Interference Currents .473			X	
115.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)			X	
116.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) **can't find. Will look for this and get it to me.**		X		
117.	192.491	Internal Corrosion Control Coupon Monitoring **(2 per yr/7½ months)** .477			X	
118.	192.491	Atmospheric Corrosion Control Monitoring **(1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore)** .481	X			
119.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485			X	

CORROSION CONTROL RECORDS			S	U	N/A	N/C
120.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) (eff 6/02/05) **half cells not tested. Volt meters are tested but no records are kept. volt meter procedure is 3.11 (no frequency)**		X		

Documentation Reviewed:

Document Title	Document Number	Revision Date	Date Range Reviewed	Pct of Data Reviewed

Comments:
192.491- no interference bond monitoring
192.491 – no unprotected pipelines
480-93-110(5)(a) – all casings have test leads
480-93-110(5)(b-d) – no shorted conditions
192.491 – no interference currents or corrosive gas transported
192.491 – was unable to provide records showing that the internal surface of a segment of removed pipeline was removed
192.491 – no coupons
192.491 – no remedial actions required since last inspection
480-93-110(3) – CP equipment not calibrated per manufacturers recommendations – no procedures

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
121.	192.161	Supports and anchors	X			
122.	192.179	Valve Protection from Tampering or Damage	X			
123.	480-93-015(1)	Odorization	X			
124.	192.463	Levels of Cathodic Protection	X			
125.	192.465	Rectifiers	X			
126.	192.467	CP - Electrical Isolation	X			
127.	192.469	Test Stations (Sufficient Number)	X			
128.	192.479	Pipeline Components Exposed to the Atmosphere	X			
129.	192.481	Atmospheric Corrosion - monitoring	X			
130.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992)	X			
131.	192.605	Knowledge of Operating Personnel	X			
132.	480-93-124	Pipeline Markers	X			
133.	192.751	Warning Signs	X			
134.	192.719	Pre-pressure Tested Pipe **(Markings and Inventory)**				X
135.	192.739	Pressure Limiting and Regulating Devices **(Mechanical)**	X			
136.	192.743	Pressure Limiting and Regulating Devices **(Capacities)**	X			
137.	192.745	Valve Maintenance	X			
138.	192.801 - 192.809	Operator qualification questions – Refer to OQ Field Inspection (Protocol 9) Form	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
Gate station		Williams tap
Over pressure protection (downstream)		At Avista metering station and plant piping

Comments:

Recent Pipeline Safety Advisory Bulletins:

OPS, PHMSA DB-06-03 dated 11/17/2006 **Notice to Operators of Natural Gas and Hazardous Liquid Pipelines to Accurately Locate and Mark Underground Pipelines Before Excavation Activities Commence Near the Pipelines**
Excavation damage continues to be one of the three leading causes of pipeline damage. PHMSA continues to find pipeline operators damaging regulated pipelines, production and gathering pipelines, and other utilities adjacent to where construction and maintenance is being performed. This damage jeopardizes the safety of excavators, pipeline employees, construction personnel, and others in the vicinity of the excavation. To guard the integrity of buried pipelines and prevent injury, death, and property and environmental damage, PHMSA advises pipeline operators to take the 15 damage prevention measures outlined in this notice.

OPS, PHMSA ADB-06-01 dated 1/17/06 **Integrate Operator Qualification Regulations into Excavation Activities**
Although excavation is not explicitly addressed in 49 CFR parts 192 and 195, excavation is considered a covered task under the pipeline operator qualifications regulations. These regulations require that pipeline operators and contractors be qualified to perform pipeline excavation activities. This advisory reminds operators to ensure all procedures and processes to perform excavation and backfilling are followed. Only qualified personnel must oversee all marking, trenching, and backfilling operations. Y/N Y

OPS, PHMSA ADB-05-06 dated 8/05/05 **Counter Measures to Prevent Human Fatique in the Control Room**
The purpose of this advisory is to help operators ensure that controllers are not assigned to shift duties while fatigued, to advise pipeline operators on considerations which could cause a reduction of mental alertness or decision making ability, and to encourage safe management practices. Y/N _____

OPS, PHMSA ADB-05-03 dated 5/17/05 **Pipeline Safety: Planning for Coordination of Emergency Response to Pipeline Emergencies**
Concerns alerting pipeline operators about the need to preplan for emergency response with utilities whose proximity to the pipeline may impact the response. Coordination with electric and other utilities may be critical in responding to a pipeline emergency. Preplanning would facilitate actions that may be needed for safety, such as removing sources of ignition or reducing the amount of combustible material. Y/N _____

WUTC PSS AB 04-01 dated 10/24/04 **Maintenance of Impressed Current Cathodic Protection Systems**
Is the operator aware of the advisory bulletin, and has the operator reviewed their Plans and Procedures to determine whether adequate processes are in pace to ensure that impressed current cathodic protection systems are configured and labeled correctly? Y/N _____

Comments: