

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

A completed Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report are to be submitted to the Senior Engineer within 30 days from completion of the inspection.

Inspection Report			
Docket Number	PG-080108		
Inspector Name & Submit Date	Stephanie Zuehlke 9/9/09		
Sr. Eng Name & Review/Date	David Lykken 9/16/09		
Operator Information			
Name of Operator:	Cascade Natural Gas	OP ID #:	31522
Name of Unit(s):	Aberdeen		
Records Location:	Aberdeen 713 W. Wishkah St. 98520		
Date(s) of Last (unit) Inspection:	April 18-21, 2006	Inspection Date(s):	December 1 – 5, 2008

OQ completed 12.04.08 and 12.09.08 – OQ Form uploaded PHMSA 09.08.09 under visit #10254.

HQ Address: 222 Fairview Ave. N Seattle Wa 98109	System/Unit Name & Address: 713 W. Wishkah St. Aberdeen, WA 98520	
Co. Official: Eldon N. Book Phone No.: 208-377-6088 Fax No.: Emergency Phone No.: 206-654-4069 206-654-4029 Gas Control Office 24hrs	District Official: Steve Sorenson, Dist. GM Phone No.: 360-581-5297 Fax No.: 360-562-1072 Emergency Phone No.:	
Persons Interviewed	Title	Phone No.
Sam Hicks	Pipeline Safety Specialist	2063816725
Dustin Knowles	Corrosion Technician	3609415986
Steve Sorensen	District GM	3605815297
Chanda Marek	Sr. Director, Western Region	2063210851
Richard Coy	Field Facilitator – Bremerton	

WUTC staff conducted an 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)

<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	1/22-25/2007

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GAS SYSTEM OPERATIONS			
Gas Supplier		Williams	
Services: Residential 5470 Commercial 1148 Industrial 15 Other			
Number of reportable safety related conditions last year 0		Number of deferred leaks in system 0	
Number of <u>non-reportable</u> safety related conditions last year 1		Number of third party hits last year 8 plus 3 for 2008 to date	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 18.49 miles Class 4		Miles of main within inspection unit (total miles and miles in class 3 & 4 areas) To be provided	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	8" Kitsap Line #1 Transmission 475psi average up to 485psi & 12" Kitsap HP Line # 15 Transmission – same as above 8" Gray's Harbor (McCleary) HP Distr. Inlet R#10 280psig 8" Gray's Harbor (McCleary) HP Distr. Inlet R#08 142psig 4" Elma Primary R#06 134psig 4" Elma R#41 56psig Annual Maint. Completed 01.19.08	499psi 305psig 150psig 150psig 60psig	475psi 11.20.08 260psig-265psig 11.20.08 14psig 11.20.08 132-136psig 56psig
Town:	45psi - 60 psi Shelton from R#17- 23psi Elma from R#07 - 22psi Montessano R# 05 – 22psi Aberdeen R# 01 – 134psi Aberdeen R#2 – 50psig McCleary R#9 – 22psig Shelton R#43 – 23psig Shelton R#13, 15, 17, 19, 18, 27, 30, 32, 33, 34, 39, 38, 40. Average 25psig	60psi 27psi 25psi 25psi 150psi 60psig 25psig 60psig 60psig	45-60psi 11.22.08 22.5psig - 23psi (20.5psi – 18psi) 11.20.08 11.20.08 22psi – 20psi 11.20.08 132psig-134psig 11.20.08 50-54psig 11.20.08 20.5psig-22psig 11.20.08 20.5 – 22.5psig 20psig – 30psig
Other:			
Does the operator have any transmission pipelines?		Yes, see above.	
Compressor stations? Use Attachment 1.		none	

Pipe Specifications:			
Year Installed (Range)	1958-2008	Pipe Diameters (Range)	½" – 12"
Material Type	5L x42, 46, 52 steel, 3408 PE	Line Pipe Specification Used	
Mileage		SMYS %	Transmission 24.88% Highest

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) 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** 9/8/09

REPORTING RECORDS			S	U	N/A	N/C
1.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802) None from Aberdeen District	x			

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REPORTING RECORDS			S	U	N/A	N/C
2.	191.23	Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery None	x			
3.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports None	x			
4.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in; Yes.				
5.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None	x			
6.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; None for 2006 , 2007, or 2008	x			
7.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; 3 evacuations; 02.20.08, 07.17.08	x			
8.	480-93-200(1)(d)	The unintentional ignition of gas;	x			
9.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	x			
10.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; 07.17.07 Design Flaw of Customer Reg. Set.	x			
11.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; None	x			
12.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
13.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;	x			
14.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; None	x			
15.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or None	x			
16.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP Five – 02.02.07, 02.16.07, 07.01.07, 07.17.07, 11.21.08	x			
17.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
18.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; only owners facilities damaged	x			
19.	480-93-200(4)(b)	The extent of injuries and damage; No injuries –	x			
20.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; None	x			
21.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;	x			
22.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
23.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	x			
24.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	x			
25.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			
26.	480-93-200(4)(i) PV	The cost of the incident to the ((operator)) gas pipeline company; no damage to facilities greater than \$50K Providing \$ figure beginning now – had not been provided since 2004.		x		
27.	480-93-200(4)(j)	Line type;	x			
28.	480-93-200(4)(k)	City and county of incident; and	x			
29.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	x			
30.	480-93-200(5)	Submit a supplemental report if required information becomes available Providing \$ for last 3 reports.	x			
31.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure None	x			

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REPORTING RECORDS			S	U	N/A	N/C
32.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
33.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	x			
34.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
35.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; provided in Annual report. 2006=2042, 2007=1970, 2008=1697 to 12.01.08	x			
36.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and 2006=7, 2007=8, 2008=3	x			
37.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: Majority of damage due to no locate. (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Excavator failed to call for a locate.	x			
38.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. Per Sam, defined response re: straps remediation to be completed 2014 which is approximately 20/year.	x			
39.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities Providing new information by December 31, 2008	x			
40.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
41.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	x			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
42.	192.16	New customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator Based upon a new customer turn-on notification – this info is auto generated. Do not find a procedure/process to identify or determine whether this information is actually being generated and sent to the appropriate customers – no auditing or monitoring of this task by CNG.	x			
43.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? CP 647.021 Series 450 EFV for low cap. Green tape; blue tape series 775 med cap.; red series 1800 efv for HP. Lyall EFV's reviewed 5/8" and 1" EFV.	x			
44.	192.383 ID'd under 080109 as an AOC – also applicable to 080108 but not ID'd seperately	Does the operator have a voluntary installation program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? CP 647 page 2 second pp states: EFV's on all newly installed and completely replaced single family residential service lines and split service lines ... The CP incorrectly utilizes the word completely when 192.383 states otherwise.		x		

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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
45.	192.383	If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate?	x			

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

CONSTRUCTION RECORDS			S	U	N/A	N/C
46.	480-93-013 ID'd under 080109 as an AOC – also applicable to 080108 but not ID'd seperately	OQ records for personnel performing New Construction covered tasks Energy world receives data information from training department but information is not audited. Test data is located with energy world and hold the on-line exam. Other than on-line exams information is kept either in division or corporate. Discussed with Sam.		x		
47.	192.225	Test Results to Qualify Welding Procedures Reviewed Kelly Campbell test records for 07.30.08; 09.24.07; 10/12/06; 12.14.05 and Kevin Berner test records for 07.30.08; 09.24.07; 10/12/06; 12.14.05.	x			
48.	192.227 AOC	Welder Qualification: Reviewed OQ for Kevin Berner – 04.25.06, 07.09.07, 10.20.08 Reviewed Kevin Berner for above dates of requal/qual for specification: GB-42-2D-TW-G8-6G. Does not meet Cascade requirements identified in their std. Sam is contacting internal weld inspector to identify issues/problems with dates and OD wall thickness issues. Review procedures to determine matches. In folder.		x		
49.	480-93-080(1)(a)(iv)	Appendix C Welders re-qualified 2/Yr (7.5Months) None	x			
50.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months) (2) Personnel qualified to join plastic pipe must be requalified at least once annually, but not to exceed fifteen months between qualifications. (a) Qualified written plastic joining procedures must be located on-site where plastic joining is being performed. (b) Plastic joiners must be requalified under an applicable procedure, if during any twelve-month period that person has not made any joints under that procedure. (c) In order to ensure compliance with (b) of this subsection and Title 49 CFR Part 192.285(c), each operator must have a method of tracking production joints. This method must be outlined in the operator's procedures manual. Production joints need to be tracked only to the extent that shows compliance with this requirement. Operators may elect not to track production joints, in which case personnel qualified to join plastic pipe must be requalified at a frequency not to exceed twelve months. Sam identified that re-qualification occurs no greater than 12 mos. So don't have to track production joints – per Cascade procedures. Reviewed records for Kelly Campbell for 2006, 2007, & 2008 Chanda is having test records for Campbell and Berner sent to Aberdeen from Yakima for review. Reviewed records for Kevin Berner for 2006, 2007, & 2008	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
51.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period Annual tests	x			
52.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) Requalification see 48 and 50 above.	x			
53.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 Tinker razer utilized since approx. 2001. CP # 755.063. New wires as required identified in CP# 605. No shorted casing requiring remedial action in Aberdeen Distr. Requiring remediation.	x			
54.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains Link seals for metal casing. Drawings in procedure manual CP# 605 (steel) & 607 (PE) No casings installed since effective date 1992.	x			
55.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services CP# 607 PE main & services and CP# 605 Steel, CP# 645 for steel and PE laterals incl. split services.. No records to provide – do not track sleeves on services. None installed on mains since prior to 1992. Sam providing info regarding removal of large number of casing from annual CP list.	x			
56.	192.241(a)	Visual Weld Inspector Training/Experience CP 760 page 29 entitled qualification for visual inspection of production welds. Reviewed Kevin Berner.	x			
57.	192.243(b)(2)	Nondestructive Technician Qualification CP# 760. Contracted out. Review contractor qualifications and approve prior to utilizing contractor. Reviewed by Engineering and Division (special construction staff located in Mt. Vernon and Yakima.)	x			
58.	192.243(c) PV	NDT procedures CP#760 last updated changes in 2006, 2007, and 2008. December 2007 May 2008 NDT procedures were updated . Reviewed existing procedure on “S” Drive and compared to Procedure Manual. Manual contains one page on NDT testing from December 2007. John Hubler’s manual in office (which is not Steve’s Manual – GM) The last update is May 2, 2008 from S drive but did not make it to manual. Per Steve latest and greatest is on S drive not in manual.		x		
59.	192.243(f)	Total Number of Girth Welds – last completed in 2002	x			
60.	192.243(f)	Number of Welds Inspected by NDT last completed 2002 - outside purview of this inspection	x			
61.	192.243(f)	Number of Welds Rejected last none since 2002	x			
62.	192.243(f)	Disposition of each Weld Rejected none since 2002	x			
63.	192.303	Construction Specifications CP#605 Steel CP#766 Transmission repair CP#640 Compliance with Transmission.	x			
64.	192.325	Underground Clearance Transmission clearance 12” and includes proximity details – CP 605	x			
65.	192.327	Amount, location, cover of each size of pipe installed Transmission cover meets requirements CP# 605. Main install other than transmission (IP) 30 in normal and 24 in other.	x			
66.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines \geq 100 feet in length None	x			
67.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: None	x			
68.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; None	x			
69.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. None	x			
70.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed None	x			
71.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; None	x			
72.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. None	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
73.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; None	x			
74.	480-93-160(2)(g)	Welding specifications; and incl. in procedures – none	x			
75.	480-93-160(2)(h)	Bending procedures to be followed if needed. Incl. - None	x			
76.	480-93-170(1)	Commission notified 2 day's prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS? None – last one completed was prior to 2002 but was not in excess or equal to 20% SMYS.	x			
77.	480-93-170(7)	<p>Pressure tests records at a minimum include required information listed under 480-93-170(a-h) WAC 480-93-170 Tests and reports for pipelines.</p> <p>(1) Operators must notify the commission in writing at least two business days prior to the commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength of the pipe used.</p> <p>(a) The pressure tests of any such gas pipeline built in Class 3 or Class 4 locations, as defined in 49 CFR § 192.5, or within one hundred yards of a building, must be at least eight hours in duration.</p> <p>(b) When the test medium is to be a gas or compressible fluid, each operator must notify the appropriate public officials so that adequate public protection can be provided for during the test.</p> <p>(c) In an emergency situation where it is necessary to maintain continuity of service, the requirements of subsection (1) of this section and subsection (1)(a) of this section may be waived by notifying the commission by telephone prior to performing the test.</p> <p>(2) The minimum test pressure for any steel service line or main, regardless of the intended operating pressure, must be determined by multiplying the intended MAOP by a factor determined in accordance with the table located in 49 CFR § 192.619 (a)(2)(ii).</p> <p>(3) Operators must perform pressure tests for all new or replacement pipeline installations.</p> <p>(4) All service lines that are broken, pulled, or damaged, resulting in the interruption of gas supply to the customer, must be pressure tested from the point of damage to the service termination valve (generally the meter set) prior to being placed back into service.</p> <p>(5) Operators may only use pretested pipe when it is not feasible to conduct a pressure test.</p> <p>(6) Operators must perform soap tests at the tie-in joints at not less than the current operating pressure of the pipeline.</p> <p>(7) Operators must keep records of all pressure tests performed for the life of the pipeline and must document the following information:</p> <p>(a) Operator's name; (b) Employee's name; (c) Test medium used; (d) Test pressure; (e) Test duration; (f) Pipe size and length; (g) Dates and times; and (h) Test results.</p> <p>Reviewed data for 2006-2008 for mains and services installation – (in folder).</p>	x			
78.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? None since.	x			

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79.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Recal annually. New dial guage #32 first utilized in 2007 and retired in 2008. Reviewed records for 2006, 2007, and 2008.	x			
80.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig None	x			
81.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig None	x			

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
82.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline None greater than 100psig. However, replacement of R#08 in McCleary is going on right now. 305psig inlet so should be reviewed at next inspection. (Not considered greater than 20%SMYS)	x			
83.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Completed May, June, and July 2008.	x			
84.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel Each serviceman carries truck grid maps. District map available in district clerks office. CAD maps available to district clerk only. Debbie Cox(district Clerk) maps all services and main for this district. Mapping is excellent in office. Keep other records in district for 5 yrs then send to corporate after 5 yrs. Except main and services originals are kept in district.	x			
85.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity?	x			
86.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures Crew inspections by GM and Division and other mgmt. Form used is Construction Inspection Checklist by mgmt for crew review.	x			
87.	192.609	Class Location Study (If pipeline operating at >40% of SMYS) Nothing in Cascade. KB interstate pipeline – Class 4 Operator.	x			
88.	192.614 PV	Damage Prevention (Miscellaneous) Washington One-call? Provide list of district persons who normally engage in excavation activities TC & Aberdeen CNG providing list of excav. For both districts.		x		
89.	192.615(b)(1) ID'd under 080109 as an AOC – also applicable to 080108 but not ID'd seperately	Location Specific Emergency Plan CNG believes that they comply by providing one copy for the GM while at the same time allowing district use of that same copy meets requirement. Copy is located in Aberdeen GM Office. And Tri-Cities Clerks office Emergency call goes to Bellingham and Seattle office Regional Director has copy.		x		

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90.	192.615(b)(2) PV		x		
91.	192.615(b)(3)	x			
92.	192.615(c)	x			
93.	192.616				
94.	192.616(e&f)	x			
95.					
96.	API RP 1162 Baseline* Recommended Message Deliveries				
97.	Stakeholder Audience (LDC's)				
	Baseline Message Frequency (starting from effective date of Plan)				
	Residence Along Local Distribution System	Annual – every other month and complete by years end.			
	LDC Customers	Twice annually			
	Emergency Officials	Annual Meetings provided dates and training.			
	Public Officials	3 years Provided dates and training.			
Excavator and Contractors PV	Annual All excavators from state licensing department were contacted along with one call listing List provided contains 5 excavators – not comprehensive enough				
98.					
99.	192.616(g)	x			
100.	192.617	x			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
101.	192.619	Maximum Allowable Operating Pressure (MAOP) See beginning of Form for details on Specific MAOP – CNG CP = 665.	x			
102.	480-93-015(1)	Odorization of Gas – Concentrations adequate Appears to be consistent usage. McCleary Odorizer #02 - 06.07=26, 07.07=20, 08.07=74, 09.07=88 – Form for August completed bt incorrectly completed. Shelton – Odorizer #01 Reviewed information for monthly usage. Copies in files.	x			
103.	480-93-015(2) PV	Monthly Odorant Sniff Testing Not necessarily testing at the extremities of the system. Need to provide evidence that locations being utilized represent the extremities of the system. Take into account the main extensions and new subdivisions in area. Also, must provide Equipment type and SN on monthly read forms. They identify three locations in each community for monthly reads and take a read at one of these locations on a monthly basis rotating until beginning again. Should be doing monthly testing at all locations if they have been identified as a monthly read location. See forms in file entitled 2008 Grays Harbor District monthly odorant tests and Miles from odorizer to monthly read location. Sniff test locations are not chosen to represent the extremities of the system.		x		
104.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements No issues with under odorization	x			
105.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Aberdeen District has only one Odorometer and reviewed records for 2008, 2007, and 2006. Insturment Repair Calibration Transmittal Form identifies that Heath Odorometer (Odorator) SN 2000507004 has been calibrated annually.	x			
106.	480-93-124(4) PV	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) Missing markers at: <ol style="list-style-type: none"> 1. Wildcat Creek xing – no markers – Elma map 14-B – Missing from Elma Leak Section Survey map as a specific location required. Main installed in 1968 but no as-builts. 2. Damaged marker on Map 14-B west of R46 3. 1820 Main St Elma- marked on leak section survey map but markers missing. No way to determine 45 day missing replacement requirement met. 4. RRxing S. Main St. , Montesano – markers missing – maps identify markers are required this location. 5. Calder Rd. & Monte ElmaRd. (w. of N. 18th St.) Marked on leak section survey map but markers missing. No way to determine 45 day missing replacement requirement met. 6. Bay Ave. and 2nd Ave. RR xing, Hoquiam – markers missing. 7. Markers at R23 R46 and other side of Hwy 8 (S. of R46) and markers at both sides of RRxing S. of R23 do not include appropriate language w/lettering 1” in height. These signs are old, one is bent, and one is covered with vegetation.		x		
107.	480-93-124(5) PV	Markers reported missing or damaged replaced within 45 days? See above. Sam identified that marker locations are reveiwed in quarterly patrol form and log. Unable to identify where markers are located, whether missing markers and remediated within 45 days. Leak survey section maps identify pipeline marker locations by indicating “pipeline marker area” via map key designation. Also, by indicating required marked xings such as RR xing, Scour xings, etc. on their leak survey maps. No way to determine whether last survey noticed that markers were missing or present due to potential for overlooking location requirement.		x		

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108.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on. Completed on-site. Requested new set records to verify. Reviewed service requests for the following: SN for gauges not included on service request form. 419 Ontario St., Hoquiam; 215 N E St, Aberdeen; = 2008 720 W. Wishkah St., Aberdeen 118 S H St., Aberdeen; 20 Niels Ln., Elma Pressure test of set information is not included on forms. CP 685 – meter and reg sets.	x			
109.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None	x			
110.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	x			
111.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; None	x			
112.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? None. CP 750 Leak investigation procedure. Form 435 – automatically generated and letter is attached to WO generated.	x			
113.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? Review R-25 and R-12 – Info in folder.	x			
114.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? None	x			
115.	480-93-187 PV	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) Reviewed records in folder. For 100E. simpson ; 100 S. 3 rd street. Address confusion. McCleary Section #1 Leak report – no equipment id'd for residual gas on WO# 0049724; 0049725		x		

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116.	480-93-188(1) PV	<p>Gas leak surveys (1) Operators must perform gas leak surveys using a gas detection instrument covering the following areas:</p> <p>(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, a survey must be conducted at the building wall at the point of entrance, using a bar hole if necessary; and</p> <p>(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.</p> <p>Reviewed CNG System Surveillance Record for Aberdeen dated 03.20.07 Maps associated with this survey do not indicate on map or otherwise that all main and services have been surveyed – nothing is highlighted to assure that nothing was missed. 7 grade 3 leaks identified – 3 on FT at 4, 5, & 10 Hoffman Rd.; 2852, 2725, & 2824 Wishkah Rd. and also a grade 3 leak in vault R-3. FI SN and calibration info included on survey. Dates identified for FI SN and calibration dates identify when survey was started and when survey completed. Map sizes are small and no way to determine (from maps) that locate is happening over main. Also, markers are highlighted but nothing identified on maps ensures that all main was covered. 2006 no map available for survey of HP Line #6 04.21.06 Unable to determine where main is and whether all of line was located. Markers are normally identified on leak survey maps but now CNG says that form alone is in compliance and meets requirements – I explained the 5 yr record retention and CNG stated that these are their records. 8" HP is still using same method to identify their survey area in 2008 and 2007. 2008 stated that more markers were required between Satsop and McCleary on 10.24.08. Sam providing WO for H99 Markers. Noted that WO was created on 10.31.08 stating that markers must be installed by 12.31.08 – I identified that requirement was 45 days remediation rather than the 60 days identified – they are correcting WO# 0014652. See copy in file and corrected WO. Again, no dimensions on maps. However, maps/records have increasingly improved since 2006.</p>		x		
117.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) In folder for review.	x			
118.	480-93-188(3) PV	Leak survey frequency (Refer to Table Below)		x		

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	Business Districts (implement by 6/02/07)	1/yr (15 months) Implemented in 2006 completed annually.				
	High Occupancy Structures PV	1/yr (15 months) HO structure that were marked for BD annual leak survey were taken off the HO list. But they are able to pull up listing of HO structures off a HO structure survey list by SIC code. The only HO structures identified now is to eliminate BD HO's from being walked more than once per year. CNG and UTC appear to differ in their understanding of HO definition even though both entities contain the exact same verbage. In the time spent reviewing records in Aberdeen there is not adequate time to determine whether HO structures that meet the definition per UTC are understood with the same meaning as is understood by CNG and similar to Tri-cities understanding of this definition. CNG has stated that changes, procedures, etc. are based upon a company wide understanding.				
	Pipelines Operating ≥ 250 psig	1/yr (15 months) Reviewed HP # 2 and HP #6 for 2006 2007 and 2008 all completed within				
	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months) None.				
119.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs Reviewed special post construction for Shelton Basin Sewer Project dated 11.08.07 okay – incl. WO for service repairs post construction.	x			
120.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred See above.	x			
121.	480-93-188(4)(c) PV	Special leak surveys - Unstable soil areas where active gas lines could be affected Contractor contacted 2006 October to remediate exposed 8" HP #2 Line but not able to access yet due to weather and soil conditions. Monitoring on a quarterly basis. Reviewed records for 2007 & 2008. Leak survey annually and patrolled quarterly. Remediation incomplete.		x		
122.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions None	x			
123.	480-93-188(4)(e) PV	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 Review service tie-in. See 3 rd party damage Substructure damage/leak reports in folder.		x		
124.	480-93-188(5) PV	Gas Survey Records Gas Survey Records have insufficient detail. 232 N. Talbot St., Montesano 07.25.08, ; 321 Emerson Ave., Hoquium 10.13.08 ; Shelton Matlock Rd. R-12 – various dates in folder Also no mapping documentation for survey of HP Line #6 dated 04.21.06.		x		
125.	480-93-188(6) PV but identified in 080109 so not identified separately under 080108	Leak program - Self Audits November 2007 was last audit completed. Review forms sent in for Tri-Cities and Aberdeen 2008. CNG did not audit their leak survey/patrolling documentation – no maps for McCleary in BD, HO, or outside BD. Procedures state that surveys to be reviewed by GM for missing documentation but doesn't look like completed per procedure. Also identified as PV under Plan/Procedures.		x		
126.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 Reviewed system surveillance records for HP Line #2 dated 03.12.08; 06.19.08; 08.29.08; 11.06.08 Stating two areas of exposure and potential damage monitored quarterly above. Issues are Satsop HP Line Chehalis River xing: Erosion has continued to expose retired section of underground 4" and Good paint wrap, markers & hangers AND Grays Harbor HP Line #2 at 1,000' W of the Newman Creek Rd.: 4 wheelers causing ROW damage, markers wrap good.	x			

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127.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 Review patrol records for Transmission line labeled HP #2 for 2003 since required to retain records for 5yrs or next patrol whichever is longer. Reviewed patrol records for above dated 12.12.03; a special flood patrol dated 10.121.08; 09.09.03; 06.20.03; and 03.11.03.	x															
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128.	192.603(b) PV	Patrolling Business District (4 per yr/4½ months) Reviewed Section 1 BD for McCleary Completed in 2008. With varying dates of remediation. Add dates from forms during office review. Copies in folder. Remediation has been completed for this BD however time frames have been exceeded in some cases especially with painting remediation. Atmospheric Corrosion survey records do not appear to include or take credit for actual remediation completed and documented in other locations such as this BD leak survey. 2007 BD leak survey identified no leaks but no documentation such as a map is available and same for 2006. Similar documentation or lack of supporting documentation is the same for all other areas in this district. Reviewed quarterly BD patrolling (which includes all outside BD patrolling) for McCleary for 03.09.07; 07.10.07; 10.09.07; 12.14.07; 03.12.08; 06.19.08; 08.29.08; 11.07.08		x														
129.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) See above	x															
130.	192.603(b) PV	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) Reviewed Section 5 "outside BD" for McCleary. Reviewed Section 5 "outside BD" for McCleary dated 03.xx.03 (outside 5 yr reqmt) – no supporting documentation available for this cover sheet such as maps, etc.		x														
131.	192.603(b)	Tests for Reinstating Service Lines 192.725 Reviewed Form 293 Substructure damage. For 2008	x															
132.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 Annual Surveillance Records from 03.2008 state that the Satsop HP 4" at Chehalis River xing is abandoned.	x															
133.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 Reviewed R-10 = McCleary Gate – Transmission. Also R-11 Deegan Rd. @ 8" Kitsap Gate. Info in files. Reviewed R-21, R-29, R-41, R-22. 2008 records indicate an improvement in items reviewed and remediated over 2007 such as addressing appropriate vent direction, pipe to metal contact - addressing strapping issues on above reviewed documents. CNG has 44 Reg Sta in this district. /Dec. of 2007 R-25 at Matlock and Shelton was replaced by R-51 located at Shelton Springs Red. @ Matlock Rd. in Shelton. With 155 inlet and outlet 60psig due to third party damage – car damage -12.26.07 with next annual on 09.09.08.		x														
134.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 No adjustments to district no capacity changes . Requested info on capacity issues with 2006 and 2007 capacity review – wondering why shuts on relief (monitor?).	x															
135.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 One wheel valve with same conditions applying to below ground valves V-01 remaining approx 76 valves. Reviewed annual maintenance for 2007 and 2008. okay	x															

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136.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 Same as above – listed distribution valves in above transmission valve question.	x			
137.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) Two service valves installed in 2008 none in 2007 or 2006 = SV-001 1200 Soule Ave., Hoquiam 2”k PE new 04.11.08 and SV – 002 . = 1430 Shelton Springs Rd. 2” PE New 04.25.08	x			
138.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 None per Steve	x			
139.	192. 603(b)	Welding – Procedure 192.225(b) API 1104 welding procedures,. Kevin Berner is the only certified 1104 welder in district.	x			
140.	192. 603(b)	Welding – Welder Qualification 192.227/.229 Kevin Berner is not qualified to weld on ≥20%SMYS – Division special construction is called upon to do all CNG transmission weling.	x			
141.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) All mag-flux and nuke are contracted and approved by director of engineering. No company employees are NDT qual. – they contract review.	x			
142.	192.709	NDT Records (pipeline life) .243(f) None since 2006 within the perview of this std. inspection. If any records they would be in engineering at corporate.	x			
143.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) None Reviewed 2008, 2007, 2006 documents from reg/gate station maintenance.	x			

Comments:

Reviewed annual odorizer maintenance for 001 = Deegan Rd. at Kitsap , Shelton Reviewed 12.07.07 and 06.09.08
002 Sine Rd. S. of SR-8 Grays Harbor Line McCleary. Reviewed 08.16.07 and 08.29.08
Requested detailed info on time frame for odorizer 001 out of service and checks for proper maintaining odorant in system.
Info in folder.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
144.	192.453	CP procedures (design, installation, operation, and maintenance) carried out by qualified personnel Dustin Knowles NACE Cert No. 8555 Expiration: 01 June 2011 CP III – Cathodic Protection Technology and Internal Corrosion Technologist . OQ Areas - Rectifier Read Qualification-1300DOT ; Pipe to Soil – 1320DOT; CP#755. 1260DOT Coating Protection of Above Ground Structures; 1385DOT id of above gr. Corrosion; 1390 DOT id of corrosion below ground. CP 755 is procedure and CP 605 and CP 645.	x			
145.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) CP 710. Xtrude coat for all new steel pipe. Maintaining coal tar on steel. Pritec Coating utilized for crossings and boring – HD PE	x			
146.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)Yes	x			
147.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) None.	x			

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148.	192.491	Maps or Records .491(a) Bi-monthly monitoring report. CNG utilizes a Negative Lug potential – highest potential possible. Additionally remote reads in system not necessarily the end of system but a selected spot instead of waiting for annual survey that may show low reads. If low read then initiate low CP read form and starts 90 day clock to remediate. Reviewed form for 10.03.08; and 06.04.08 and 04.07.08-04.16.08. A short in system in 03.24.08 in Hoquiam and remediated 04.02.08. AC ground clamp to meter riser. -0.72 potential and when separated went to -1.296. Annual Survey: O&M Request form 04.30.08 due to UTC call reads were taken in Elma and results were okay -1.04 - -1.18. 04.17.-04.18.08 for Annual Survey. Maps: Reviewed maps for Aberdeen identifying location of ground beds – also for Hoquiam. Remote read sites are on new maps but not old.	x			
149.	192.491	Examination of Buried Pipe when exposed .459 Completed and kept internally and forwarded to CP if integrity mgmt. problem. CP 755	x			
150.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed If below -0.9 then complete pipe to soil 90 day remediation form #650CNG. Reviewed services and mains installed in earlier part of this form under #155 and exposed pipe info is on forms for review.	x			
151.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) Annual CP Survey. : okay	x			
152.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Form 294 Rectifier Bi-Monthly which includes Aberdeen, Hoquiam, Montesano, Elma, McCleary, and Shelton. Reviewed 2008 records.	x			
153.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) None	x			
154.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c)	x			
155.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) 2008 Short in Hoquiam 03.24.08 remediated 04.02.08 2007 03.21.07 Shelton remediated 03.26.07 – Shorts due to bypass flange at hospital detected and cleared on 03.21.07 w/CP -0.698 to -0.89 then further remediated after found short at 651 St. Andrews Dr. AC ground clamped to riser -1.386. and Shelton hospital cleared on 03.26.07 to -1.103. 2006 12.06.06 Hoquiam – Simpson & 11 th St. cleared on 01.30.07 due to rectifier stack aged. 2006 05.11.06 Hoquiam- 141 Ecklund Ave. -0.84 06.06.06 -0.943. 2006 05.09.06 Hoquiam – 200 Blaine St. Bldg. E5 – cleared 05.10.06 -0.784 after -0.978 due to no insulators on new riser. 2006 04.19.06 Hoquiam – Emerson School -.0753 and cleared to -0.917 metal cable around meter inlet to outlet. Atmospheric corrosion – object endangering meter	x			
156.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation. Aberdeen Half cell calibration annual report dated 10.29.2007 and 09.26.06 – 2008 not completed at time of inspection. Fluke Voltmeter SN#53160243 = 2007 but in 2006/2008 SN#=53160243 Asked for some 2007 documentation for Kevin Berner use of this voltmeter.	x			
157.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) None	x			
158.	192.491	Electrical Isolation (Including Casings) .467	x			
159.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months. Casing Surveys for 2006 2007 and 2008 in folder. No shorted casings. Extra Survey completed in 11.19.07 but no shorts found in April 07 survey. Total numbers of casings do not match for each year review lost/uncompleted review of casing for annual surveys. CNG identified that some areas were defined as having casings but were then found to not be cased. Unaware of whether there are any new casings added.	x			

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160.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods None	x			
161.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days Yes shorts were remediated within 90 day time frame. No 30 day extension necessary.	x			
162.	480-93-110(5)(c)	Casing shorts cleared when practical None	x			
163.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months None	x			
164.	192.491	Interference Currents .473 None found since 2006 to date.	x			
165.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) Engineering monitors supplier composition reports identifying tariff quality gas. In supplier contracts. If engineering receives report identifying request for internal corrosion check no reports are received. Once receive indication of corrosivity of product then engineering begins checked.	x			
166.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) None. And none on pipe installed after 1972.	x			
167.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 None in this district.	x			

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CORROSION CONTROL RECORDS		S	U	N/A	N/C
168.	<p>Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 CP 754. Completed entirely separately from all others – since 2004. Atmospheric corrosion found in field – & checking last monitor date. I001 Aberdeen & Hoquiam 2006 completed 12.04.06 First time completed I002 Aberdeen & Hoquiam 2006 completed 12.04.06 First time completed I003 Aberdeen & Hoquiam 2006 completed 12.04.06 First time completed I004 Aberdeen & Hoquiam 2006 completed 12.04.06 First time completed 05.20.08 remediated -458 Conger St. #409910 exceeding 6 mos. I005 Elma 2004 completed 12.13.04 First time completed Completed 12.07.07, 2nd time except for 31 not painted meeting 6 mos requirement. I006 Shelton 2005 completed 10.26.05 First time completed I007 Shelton 2005 completed 10.26.05 First time completed I008 – I014 Shelton 2005 completed 10.26.05 First time completed I016 Shelton completed 10.26.05 First time completed I017 McCleary completed 10.26.05 First time completed I018 Montesano Completed 09.08.05 First time completed I019 Shelton completed 10.26.05 First time completed I020 Shelton completed 10.26.05 First time completed I021 (241 Connemara Way) - Shelton completed 10.26.05 First time completed I022 Shelton completed 10.26.05 First time completed I023 Shelton completed 10.26.05 First time completed I024 Shelton completed 10.26.05 First time completed I025 No customers off this underground pipe I026 No customers off this underground pipe I027 No customers off this underground pipe I028 No customers off this underground pipe – water xing I029 Aberdeen No customers I030 Aberdeen completed 12.04.06 First time completed I031 Satsop Industrial Area – with industrial meter set – installed in 2001 <u>(per Sam industrial customers are inspected for atmospheric corrosion separately from atmospheric corrosion survey Sam will find out and notify me/provide me with info.)</u> Meter inspectors assigned to proof measurement verify atmospheric corrosion on industrial loops. Sam providing list for Kennewick. I032 No customers off this underground pipe I033- I036 No customers off this underground pipe Above does not include HP line AC.</p> <p>2008 AC survey not dated as to when begun or when AC issues were identified. Unknown when survey issue. Approximately 322 unremediated services.</p> <ol style="list-style-type: none"> Reg Sta 41 – partially primed in field never completed. AC reviewed on 01.14.08, 01.22.07, and 01.06.06 and paint has been identified as good (not needing paint) however, pipe has been primed only and according to CNG procedures primer is not considered a coating and needs to be painted. Reg Sta 23 – pitting is visible upon inspection 12.08.08. On 05.23.08 serviceman identified AC issues and painting was required. This was not completed. Also states paint needed on 05.22.07, and 09.30.06 but never completed. <p><u>Atmospheric corrosion records. No way to identify when survey was started – the date at the top of the atmospheric corrosion survey is not necessarily when survey was started. Time sheets do not identify the particular type of Atmos. Corrosion Maintenance they are working on or whether it is this years or a previous years (they use a standard number to charge to.) No record of who remediated/repared AC issues.</u></p>				
192.491 PV			x		

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
169.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Distribution HP relocation due to replacement of R08.	x			
170.	192.479 PV	<p>Atmospheric Corrosion control: General. (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere CNG determined that A/C remediation was required at 109 E. 2nd, Aberdeen and identified that A/C remediation had been completed. The pipe was not cleaned and the pipe was not coated per CNG procedures.</p> <p>CNG did not follow their atmospheric corrosion remediation procedures. During pre-field inspection on 05.01.08, staff noted severe atmospheric corrosion with some pitting on the meter loop located at 109 E. 2nd in Aberdeen – meter #247029. Staff and CNG returned to this location to complete an OQ on corrosion identification/pipe loss on 12.09.08. Upon arriving at this site it was noted that loop had been just recently painted. (It was later identified that The following were noted on 12.09.08:</p> <ol style="list-style-type: none"> Loop had been painted without wire-brushing the surface Paint had been built-up in the pitted area and was now level with the surrounding pipe surface. No pit gauge measurement was taken and no documentation of pitting was noted/provided. Weeds at the interface had been painted over indicating that this may not have been reviewed. The underside of the pipe remaining untouched with no remediation/paint with large paint peels still visible and attached to pipe. <p>In a follow-up to this inspection CNG identified the following:</p> <ol style="list-style-type: none"> This loop had been painted on 12.08.08 in response to Service Request # 0052350 generated on 11.17.08 with the instructions: "L/S AOC – Paint Meter. Painted meter set. Turned vent downward." The previous inspection of this loop occurred on an unknown date in 2006 (identified on a print-out dated 12.07.05 but utilized for the survey completed in 2006) by an unknown employee. A handwritten attachment to the above described 2006 inspection wherein it appears to identify that this loop had already been painted on 04.29.08 or on 04.29.08 a noted AOC was identified and painting was requested. Either way, the 6 month remediation timeframe had expired. <p>Cause for speculation as to whether this level of remediation occurs elsewhere within the system.</p>		x		
171.	480-93-110(3)	CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched) CP756 Once per year not to exceed 15 months.	x			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
172.	192.161	Supports and anchors Pipe supports are tack-welded to the above ground meter manifold piping causing a potential restriction of expansion/contraction of the pipe between supports at 709 "J" St., Hoquium. The meter for Broadway Manor located at W. 2 nd & N. Broadway, Aberdeen, has been set on combustible material (2-4x4 wood blocks).		x		
173.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	x			
174.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables		x		

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		The following API 1104 Weld and Coupon Test Data Reports do not contain test data and do not indicate that tests on the welds were conducted: a. API 1104 Weld and Coupon Test Data Report for CNG employee K.B. - submittal date 04.25.06 for Specification: GB-42Y-2D-TW-G8-6G. b. API 1104 Weld and Coupon Test Data Report for CNG employee K.B. – submittal date 07.09.07 for ‘Specification: GB-42-SD-TW-G8-6G’. [sic] c. API 1104 Weld and Coupon Test Data Report for CNG employee K.B. – submittal date 10.20.08 for Specification: GB-42Y-SD-TW-G8-6G.				
175.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	x			
176.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed.	x			
177.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified?	x			
178.	480-93-015(1)	Odorization Sniff test locations potential problem – no eng. Doc to back up/define sniff test loc choice.		x		
179.	480-93-018(5) PV	Updated records, inc maps and drawings made available to appropriate operations personnel? CNG identified their field maps have not been updated since 2006 but that map in office is accurate and updated. Maps also avail. On computer. The maps used in field during site visit were not updated and lacked up-to-date field changes. Ex. Calder Rd. and Monte Elma (W. of N. 18 th St.), Aberdeen		x		
180.	192.179	Valve Protection from Tampering or Damage	x			
181.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	x			
182.	192.463	Levels of cathodic protection	x			
183.	192.465	Rectifiers	x			
184.	192.467	CP – Electrical Isolation	x			
185.	192.479 PV	Pipeline Components exposed to the atmosphere (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere. 1. 109 2 nd , Aberdeen – pitting of pipe noticed during pre-field. Reviewed in field with CNG. When returned at end of std. inspection to do OQ on pipe loss noticed that loop had just been painted and sideways vent had had a nipple and 90 installed and had been primed. Weeds were painted over at the interface and pipe had not been cleaned/wire brushed. Also, underside of pipe still had large peels of paint still on pipe with no paint. CNG did not follow own procedures. Requested info from Sam re: this loop 2. Reg Sta 41 below Nuke Stacks primed >6 mos w/o remediation 3. SW corner W. Main & W. 13 th St., Elma (1301 W. Main) 4. 410 N. Satsop St., Montesano 5. Body & Back Kneads – E. Pioneer Ave., Montesano 6. 113 & 115 Main St., Montesano The following are under order to correct by 2010 but were identified as having not been completed at time of inspection: 1. Reg Sta 5 a. Metal straps on inlet leg between runs needs to be removed b. Metal strap on inlet leg for chart box needs to be removed 2. Reg Sta 4 a. Metal straps same as #15 above		x		
186.	192.481 PV	Atmospheric Corrosion: monitoring (b) During inspection the operator must give particular attention to pipe at soil-to-air interfaces. 1. 1246 Monte Elma Rd., Elma – Seventh Day Adventist Church Meter#290725 a. Loose wrap 2. Meter# 101980 – Newer Bldg. E. of St. John’s Catholic Church 414 E. Broadway St., Montesano a. Damaged wrap 3. Body & Back Kneads – 210 Main St., Montesano a. No wrap – this service remediated prior to site visit w/CNG-okay 4. Meter# 291404, 118 W. Marcy Montesano, no wrap 5. Alley/Parking behind The Vidette, 201 S. Main st. Montesano		x		

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		a. Riser no wrap, etc. 6. 109 Marcy – Alley/Parking behind The Vidette – no interface/coating damaged – built into stucco wall. 7. 313 & 315 S. Main St., Montesano – bad wrap 8. 709 J St., Hoquim – Bad wrap, no wire 9. Meter # 413371 & 154553 Bad wrap				
187.	192.491	Test Stations – Sufficient Number .469	x			
188.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
189.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	x			
190.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	x			
191.	192.605(a) PV ID'd under 080109 not identified under this docket separately	Appropriate parts of manuals kept at locations where O&M activities are conducted Emergency procedures 1 copy located in GM office. ID'd under 192.615 – only one copy not where emergency activity is conducted.		x		
192.	192.605	Knowledge of Operating Personnel	x			
193.	480-93-124 PV	Pipeline markers installed Missing markers several locations. See letter/pre-field for detail issues		x		
194.	480-93-124(4) PV	Markers reported missing or damaged replaced within 45 days ? Same as above – 193.		x		
195.	192.707 PV	Warning Signs See pre-field for detail issues		x		
196.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	x			
197.	192.195	Overpressure protection designed and installed where required?	x			
198.	192.739	Pressure Limiting and Regulating Devices (Mechanical)	x			
199.	192.743	Pressure Limiting and Regulating Devices (Capacities)	x			
200.	192.355 PV	Customer meters and regulators. Protection from damage 1. Alley S. of Main St., "Elma Variety"; Meter No. 256445 2. 109 N. Broadway – Whiteside Mortuary 3. Alley – 325 W. Main St. - Elma Variety Store 4. 1006 North H St. – Gray's Harbor Community Hospital		x		
201.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	x			
202.	480-93-140 PV	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? Sideways vent locations id'd in pre-field and letter. Also a CNG procedures issue on SW vent install.		x		
203.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	x			
204.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	x			
205.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	x			
206.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently?				
207.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? No temporary PE			x	
208.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? No temporary PE			x	
209.	192.745	Valve Maintenance (Transmission)	x			
210.	192.747	Valve Maintenance (Distribution)	x			

Utilities and Transportation Commission
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Comments:

ABERDEEN PRE-FIELD WORK

ELMA 04.28.08

5. Alley S. of Main St., "Elma Variety"; Meter No. 256445
 - b. Sideways vent
 - c. CP read -0.55
6. Alley S. of Main St., "Purple Raze Tanning"; Remote Read No. 6-0104007
 - d. Low CP read – service in asphalt -0.06
7. Alley S. of Main St., north side of alley – three meter manifold E of Purple "Raze Tanning" & W of "House of Hair"; Meter No(s). 673093/187397/150994
 - e. Customer piping is tied up by rope and duct strapping/bent and unsupported for over 20'
 - f. Low CP read – service in asphalt -0.89
8. Alley S. of Main St., eight meter manifold behind Saginaw's Restaurant;
 - g. Qualifies for Small Gas System Study due to 2 underground commercial service off this set
 - h. Unsafe condition – at least 3 spuds missing w/no locked valves
 - i. Low CP read – service in asphalt -0.002
9. Alley S. of Main St., south side of alley at 3rd St.; Meter No. 680291
 - j. Low CP read – service is in asphalt -0.18
10. Alley S. of Main St., south side of alley at 4th St.
 - k. Low CP read – service is in asphalt -0.45
11. Alley S. of Main St., north side of alley behind McLaughlin Hall; Meter No. 246527
 - l. Low CP read – service is in pea gravel -0.40
12. Alley S. of Main St., south side of alley on west side of Church; AL-1000 Meter No. 246527
 - m. Low CP read – service is in soil -0.43
 - n. AL-1000 supported on piping alone – improper meter support
13. Chehalis Bridge Xing on the way to Satsop **PHOTOS**
 - o. Abraded piping plus stress cracks in coating?
14. Reg Sta 41 below Nuke Stacks
 - p. Station is in multiple states of maintenance
 - q. Wrap okay
 - r. All rust has not been primed – check CNG maintenance procedures
15. Monitor Station off Olympia View Dr. in Satsop Development Park @ Lampert
 - s. Severe atmospheric corrosion **PHOTOS**

Elma – 04.29.08

04.29.08 – Notified both Sam Hicks and Joe Maxwell of low reads in Elma. Joe identified that Elma had a single rectifier. Waiting to hear remediation from them within 90 days. 05.14.08 – Joe Maxwell and Sam Hicks identified that shortly after receiving this notification, field personnel were on-site to investigate whether the single rectifier was down but reported that they were unable to find any low reads. Joe indicated that UTC half-cell may have been contaminated. I identified that our equipment was not calibrated and we utilized it only to identify possible problems.

16. 1217 W. Main St.
 - t. Missing plug @ spud on two meter manifold w/no locked valve Meter# 225356
17. SW corner W. Main & W. 13th St.
 - u. Service riser extreme atmospheric corrosion
18. 1246 Monte Elma Rd. – Seventh Day Adventist Church Meter#290725
 - v. Loose wrap

Montesano – 04.29.08

19. Reg Sta 5
 - w. Metal straps on inlet leg between runs needs to be removed
 - x. Metal strap on inlet leg for chart box needs to be removed
20. Check 800 number on CNG markers – 800.552.0615
21. Corner of Log Shear Ln. and Camp Creek Rd. CP -1.50 on Farm Tap
22. Reg Sta at Camp Creek Rd & 91 Camp Creek Rd – NE Corner
 - y. Unidentified/Not labeled as a Reg Sta
 - z. Ask for maintenance records
 - aa. Check violation on last inspection
23. Reg Sta 4
 - bb. Metal straps same as #15 above
24. 410 N. Satsop St
 - cc. Atmospheric Corrosion
25. 615 N. Church St.

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Comments:

- dd. No plug in spud
- ee. No lock on service valve
- 26. 317 E. Spruce – Church of God
 - ff. 2 buildings – check on separate services – only saw 1 meter
- 27. E. Broadway St. – St. John's Catholic Church
 - gg. CP -1.50
- 28. Meter# 101980 – Newer Bldg. E. of St. John's Catholic Church on E. Broadway St.
 - hh. Damaged wrap
 - ii. CP -1.48

04.30.08 Montesano – 50F Cloudy, showers

- 29. 109 Marcy Ave. – in alley - E. Pioneer Ave. W. of River St.
 - jj. Meter set on NE corner has no wrap – in asphalt
 - kk. CP -1.80
- 30. Body & Back Kneads – E. Pioneer Ave.
 - ll. No wrap – riser in concrete
 - mm. Severe atmospheric corrosion/pitting
 - nn. Vent has 4-90's and terminates under an eave
 - oo. Vent has no strapping and is under a dilapidated building roof
- 31. Police Dept.
 - pp. Check maintenance on this riser – no meter/valve locked
- 32. E. Marcy Ave. & S. Sylvia – NW corner
 - qq. Check maintenance on this riser – no meter/valve locked
- 33. 113 & 115 Main St.
 - rr. Atmospheric corrosion
- 34. Meter# 291404
 - ss. CP -1.20
 - tt. No wrap/in concrete
- 35. Alley/Parking behind The Vidette and Drive-up Bank
 - uu. Meter #269328 & 269526
 - vv. Low CP -0.75 (isolated service?)
 - ww. Coated riser but no wrap below grade
- 36. Alley/Parking behind The Vidette
 - xx. Riser no wrap, etc.
 - yy. Built into wall
 - zz. Low CP -0.53 (isolated service?)
- 37. E. Pioneer – Whitney's Auto – Meter# 269328
 - aaa. Low CP -0.53
- 38. 313 & 315 S. Main St. – Charlies Sports Bar/VF? - Meter# 269343
 - bbb. Bad wrap – collecting water
 - ccc. Underground piping – in concrete – svc.
- 39. S. Main St. RRxing
 - ddd. No markers on both sides of tracks
 - eee. Cased piping? – no vents visible.
 - fff. Provide list of casings

McCleary – 05.01.08 – 50F Cloudy

- 40. McCleary Rd. @ R46 Vault
 - ggg. No vent found (size of vault require venting?)
 - hhh. Approx. 4x4x4? <200CF?
- 41. McCleary Rd. @ R46
 - iii. Casing on road crossing? V79
- 42. 106 Simpson Ave. at storage building W of 106 Simpson Ave.
 - jjj. CP -1.20
- 43. 227 Simpson Ave. – Select Market
 - kkk. CP -1.80 @ riser NE Corner
- 44. Bridge xing W of Easy Storage building @ S 967 Simpson Ave.
 - lll. No markers – xing here?

Aberdeen 05.01.08 – 50F Cloudy

- 45. St. Mary's Catholic Church – E. Third @ E. "H" St.
 - mmm. Meter 561475
 - nnn. Valve inaccessible – no valve outside locked gate and must climb fence to access – very tight quarters

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Comments:

- ooo. PHOTO
- 46. 309 E. 3rd St
 - ppp. MM – 4 apartments off propane tank in very poor condition
 - qqq. Regulator not protected under bonnet and no support for regulator or copper piping unprotected
 - rrr. PHOTO
- 47. Broadway Manor @ W 2nd & N Broadway
 - sss. CP -1.29 Meter 1538383
 - ttt. Meter supported on organic material – wood supports
 - uuu. Written up on prior inspection and has not been corrected
- 48. ?Business District West of W Second St.
- 49. 109 N. Broadway – Whiteside Mortuary
 - vvv. Meter 247029
 - www. PHOTOS
 - xxx. Pipe loss/pitting?
 - yyy. Sideways vent
- 50. Bay Ave. – 2nd RR xing
 - zzz. No markers – CNG main here?

Hoquium 05.01.08 – 50F Cloudy

- 51. 1958 Simpson Rd. – SE corner
 - aaaa. Riser valve inaccessible
- 52. 1407 Sangder – Street NW of “C”
 - bbbb. CP -1.20
 - ccc. Newly installed service has lock option on customer side – check O & M for procedure/set procedure
 - ddd. Riser is unsupported and meter has been set
 - eee. PHOTOS
- 53. 709 “J” St. – Set on E. side in parking/alley
 - ffff. Bad wrap @ 4 meter manifold
 - gggg. No support for AL-1000 w/2# reg ahead of meter & 6-14” reg on customer side – both regs labeled as belonging to CNG – Who maintains customer reg. Where are maintenance records?
 - hhhh. If CNG setting downstream equip. where are all others located and maintenance records.
 - iiii. How do field staff know what is what?
 - jjjj. How does field staff identify their time so that rate payers not affected by private contract to maintain customer equip?
- 54. See pre-field book for map of #49 above and following 5 services in alley between “J” St. & Simpson
- 55. 316 8th St. – Harbor Drug & Gifts
 - kkkk. No wrap
- 56. 718-722 Simpson in alley – Trios Bar
 - llll. Tee before valve on riser – no valve to shut?
- 57. Rear of 709 “J” St. in alley
 - mmmm. Riser abraded and unprotected
 - nnnn. Bad wrap
 - oooo. No support for AL-1000
 - pppp. Unsafe customer piping – unsupported and may affect set if collapse/damaged
 - qqqq. Downsized relief/vent on customer reg which could adversely affect set if relieves – unable to access shut-off if issue with customer piping affecting multiple customers
- 58. 708 Simpson
 - rrrr. CNG has svc valve padlocked shut
 - ssss. Bad wrap
 - tttt. Customer piping is plugged with rag on interior of building
- 59. Corner of Simpson & 7th St. – Moe – B Trading Co.
 - uuuu. Downspout drains into/onto inset meter set
 - vvvv. Svc. Requires barricade – protection of riser in alley
 - wwww. Bad wrap.

Elma 05.28.08 – 50F Overcast

- 60. Alley btwn W. Main St. & Waldrip St. - Bldg. E. of 325 W. Main
 - xxxx. CP -1.01
- 61. Alley btwn W. Main St. & Waldrip St. - Purple Haze
 - yyyy. CP -1.01
- 62. Alley – 301 W. Main St. - Saginaw’s Deli & Diner
 - zzzz. CP -0.80
- 63. Alley of 300 blk. Btwn W. Main St. & Waldrip St. – E end S side of alley
 - aaaa. CP -1.06
- 64. Alley – 325 W. Main St. - Elma Variety Store

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Comments:

- bbbb. Riser in stucco
- cccc. Sideways vent
- 65. 602 W. Main St. – 1st Baptist Church
 - dddd. Meter 285421
 - eeee. CP -0.042
- 66. Monte Elma Rd. E. of Elma Elementary School
 - ffff. No xing pipeline markers
- 67. Monte Elma Rd. – Lutheran Church
 - gggg. HO Structure
- 68. Monte Elma Rd. Creek xing E of Lutheran Church
 - hhhh. No pipeline marker E. of bridge
- 69. E. of Monte Elma Rd. & Hurd Rd.
 - iiii. Small Business District
 - i. Elma Health Clinic
 - ii. Grocery & Gas Station
 - iii. Car Wash
- 70. Bethany Baptist Church
 - jjjj. HO Structure
- 71. RRxing East of E. Satsop Rd.
 - kkkk. No pipeline markers
- 72. E. Satsop Rd.
 - llll. CNG HP Valve #66
 - mmmm. Wrap okay
 - nnnn. Slight corrosion
 - oooo. Check R/W clearing dates
- 73. Navigable water xing on Satsop Rd. off HP Valve #66 location?
 - pppp. Pipeline markers?

Aberdeen 05.28.08 Overcast 50F

- 74. 920 Anderson Dr. – Gray's Harbor Health & Rehab Center
 - qqqq. No interface
 - rrrr. Bare metal
- 75. 1006 North H St. – Gray's Harbor Community Hospital
 - ssss. Sideways vent
 - tttt. Bad wrap
 - uuuu. Telemetry wire insulation worn
 - vvvv. Chipped & surface corrosion
 - wwww. Pipe enters building underground & has corrosion

Hoquium 05.28.08 Overcast 50F

- 76. 520 5th St. – United Methodist Church
 - xxxx. Meters 391794 & 215517
 - yyyy. Bad wrap
 - zzzz. Surface Corrosion on riser

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Pipeline Safety Advisory Bulletins:

OPS, PHMSA ADB-08-02 dated 3/04/2008 Notice to Owners and Operators of Gas Pipelines to Consider the Potential Failure Modes for Mechanical Couplings Used for Joining and Pressure Sealing Pipe Joints

Due to variables related to age of couplings, specific procedures and installation practices, and conditions specific to certain regions of the country, it is difficult to cite common criteria affecting all failures that operators should address. To ensure compliance with 49 CFR Part 192, PHMSA advises operators of gas distribution pipelines using mechanical couplings to take the 7 measures outlined in this notice.

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.

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		COMPRESSOR STATION PROCEDURES		S	U	N/A	N/C
211.	.605(b) NO COMPRESSOR STATIONS THIS INSPECTION LOCATION						
212.		.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			x	
213.		.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units			x	
214.		.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			x	
215.		.735	(a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			x	
216.			(b) Tank must be protected according to NFPA #30			x	
217.		.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			x	
218.			• 50% of the upright side areas are permanently open, or			x	
219.			• It is an unattended field compressor station of 1000 hp or less			x	

Documentation Reviewed:		
Document Title	Document/Section Number	Revision Date

Comments:
 NO COMPRESSOR STATIONS THIS INSPECTION LOCATION

		COMPRESSOR STATION O&M RECORDS		S	U	N/A	N/C
220.	.709 NO COMPRES SOR STATIONS THIS INSPECTI ON LOCATIO N	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)			x	
221.		.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)			x	
222.		.736(c)	Compressor Stations – Detection and Alarms (Performance Test)			x	

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Comments:
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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C	
(Note: Facilities may be "Grandfathered")							
223.	.163	(c) Main operating floor must have (at least) two (2) separate and unobstructed exits			x		
224.		Door latch must open from inside without a key			x		
225.		Doors must swing outward			x		
226.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			x		
227.		Each gate located within 200 ft of any compressor plant building must open outward			x		
228.		When occupied, the door must be opened from the inside without a key			x		
229.		(e) Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			x		
230.		.165	(a) If applicable, are there liquid separator(s) on the intake to the compressors?			x	
231.			(b) Do the liquid separators have a manual means of removing liquids?			x	
232.	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?				x		
233.	.167	(a) ESD system must:					
234.		- Discharge blowdown gas to a safe location			x		
235.		- Block and blow down the gas in the station			x		
236.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x		
237.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			x		
238.		ESD system must be operable from at least two locations, each of which is:					
239.		- Outside the gas area of the station			x		
240.		- Not more than 500 feet from the limits of the station			x		
241.		- ESD switches near emergency exits?			x		
242.		(b) For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			x		
243.		(c)	Are ESDs on platforms designed to actuate automatically by...				
244.			- For unattended compressor stations, when:				
245.		▪ The gas pressure equals MAOP plus 15%?			x		
246.		▪ An uncontrolled fire occurs on the platform?			x		
247.		- For compressor station in a building, when					
248.		▪ An uncontrolled fire occurs in the building?			x		
249.	▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?			x			
250.	.171	(a) Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			x		

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Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
251.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
252.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
253.	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
254.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
255.	.173	Is each compressor station building adequately ventilated?			X	
256.	.457	Is all buried piping cathodically protected?			X	
257.	.481	Atmospheric corrosion of aboveground facilities			X	
258.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
259.		Are facility maps current/up-to-date?			X	
260.	.615	Emergency Plan for the station on site?			X	
261.	.619	Review pressure recording charts and/or SCADA			X	
262.	.707	Markers			X	
263.	.731	Overpressure protection – relief's or shutdowns			X	
264.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
265.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			X	
266.	.736	Gas detection – location			X	

Documentation Reviewed:			
Document Title	Document Number	Revision Date	Date Range Reviewed

Comments: NO COMPRESSOR STATIONS THIS INSPECTION LOCATION
