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-080109		
Inspector Name & Submit Date	Stephanie Zuehlke 7/27/09		
Sr. Eng Name & Review/Date	David Lykken 7/29/2009		
Operator Information			
Name of Operator:	Cascade Natural Gas Corporation	**OP ID #:**	2128
Name of Unit(s):	Tri-Cities District and Walla Walla District		
Records Location:	Tri-Cities: 200 N. Union St., Kennewick and Walla Walla: 324 W Rose, Walla Walla		
Date(s) of Last (unit) Inspection:	8/28/06 to 8/31/2006	**Inspection Date(s):**	Sept. 22 – Oct. 8, 2008

Inspection Summary:

Refer to cover letter and findings report

HQ Address:		**System/Unit Name & Address:**
222 Fairview Ave N Seattle, WA 98109		Tri Cities District: 200 N Union St., Kennewick Walla Walla District: 324 W Rose, Walla Walla
Co. Official: **Phone No.:** **Fax No.:** **Emergency Phone No.:**	Eldon Book, Exec. VP Operations 206.381.6821 206.654.4039 206.465.2378	**Phone No.:** **Fax No.:** **Emergency Phone No.:**

Persons Interviewed	**Title**	**Phone No.**
Greg Miller	Corrosion Control Technician	509.728.4662
Steve Kessie	General Mgr. Tri-Cities	509.987.4539 cell
Sam Hicks	Compliance	206.381.6725 206.550.7863 Cell

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)

☒	Team inspection was performed (Within the past five years.) or,	**Date:**	1/2007
☐	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	**Date:**	

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GAS SYSTEM OPERATIONS			
Gas Supplier	Williams for Tri-Cities & Walla Walla		
Services: *Residential* TC-15,604 WW- 10,019 *Commercial* TC - 2,671 WW – 1,206 *Industrial* TC – 22 WW - 2 *Other* TC – 0 WW- 0			
Number of reportable safety related conditions last year TC-0 WW-0		Number of deferred leaks in system TC – 0 Grade 2 Found 2007 placed on quarterly patrol WW - None	
Number of non-reportable safety related conditions last year TC -0 WW-0		Number of third party hits last year TC – 2007 = 74 2008=26 WW 2007=22 2008=9	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) TC – 0 WW-0 Highest SMYS = 16.3% 8" line		Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) TC=542 miles with 50 miles HP = 492 All main is Class 4. WW=17.49 miles with 4.68 miles HP = with 16.81 miles All is Class 4.	
Operating Pressure(s):		**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:	Williams 715 psig cut to Attalia aka Burbank Heights 290psig	500 psig – Eng. As built.	290psig
	Williams 758psig cut to 150 psig at Paterson	500 psig	150 psig
	Williams 715 cut to 250 at R-15 Richland Lateral	250 psig	228-240 psig
	Williams 715 cut to 250 at R-15 Kennewick Gate	60 psig	55 psig
	Williams 715 at Pascoe – Trac 200 psig	250 psig	198 psig
	Williams 715 at Pascoe – Pascoe Gate 150 psig	250 psig	146 psig
Town:	Pascoe – Trac 26psig – 45psig Kennewick – 26 psig – 55 psig Pascoe Gate – 26psig-55psig Burbank Heights – 26psig- 60psig	60 psig	Requested copies of reg sta details copy in folder.
Other:			
Does the operator have any transmission pipelines?	None		
Compressor stations? Use Attachment 1.	None		

Pipe Specifications:			
Year Installed (Range)	1958-2008	Pipe Diameters (Range)	½"-8"
Material Type	API 5L steel / ASTM 3408 PE	Line Pipe Specification Used	
Mileage	Steel -	SMYS %	16.38% = 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** 10/21/08

	REPORTING RECORDS		S	U	N/A	N/C
1.	199.119 PV	Reporting of anti-drug testing results. MIS report has inaccuracy – in file.		x		
2.	191.5	Any incidents requiring telephonic reporting to the **NRC (800-424-8802) NONE for TC or Walla Walla**	x			
3.	191.23	Filing the **Safety Related Condition Report** within 5 days of determination, but not later than 10 days after discovery None	x			
4.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports	x			
5.	480-93-200(1)	Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9146** (Within **2 hours**) for events which results in;				
6.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization;	x			

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	REPORTING RECORDS		S	U	N/A	N/C
7.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars;	x			
8.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	x			
9.	480-93-200(1)(d)	The unintentional ignition of gas; Discussion w/staff – ongoing investigation re:house fire in Pascoe not part of this audit.	x			
10.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; Tri-Cities 3 in 2007 & 1 in 2008 TC Walla Walla 0 in both 2007 & 2008	x			
11.	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; None	x			
12.	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			
13.	480-93-200(2)	Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9146** (Within **24 hours**) for; Incident Database has 2 Media in Tri-Cities in 2007 and 1 in Tri-Cities in 2008.				
14.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; Per Sam: None. In subsequent review of Substructure Damage/Leak Reports Form 293 found 3rd Party Damage at Road 27 & Warehouse St., Pasco: Incident # 6101 (damage to 4" Steel Main – replaced 20' of 4" Steel) was reported to CNG at 14:59 on 02.12.08 with leak stopped at 18:30 on 02.12.08.	x			
15.	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			
16.	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			
17.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP None	x			
18.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
19.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	x			
20.	480-93-200(4)(b)	The extent of injuries and damage;	x			
21.	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;	x			
22.	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			
23.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
24.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	x			
25.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	x			
26.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			
27.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	x			
28.	480-93-200(4)(j)	Line type;	x			
29.	480-93-200(4)(k)	City and county of incident; and	x			
30.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	x			
31.	480-93-200(5)	Submit a supplemental report if required information becomes available None for this district	x			
32.	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** Operator identified None	x			
33.	480-93-200(7)	**Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year				

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		REPORTING RECORDS	S	U	N/A	N/C
34.	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 2006 (No receiving date stamp by UTC) Dated 03.15.07 2007 Rec'd. by UTC 03.14.08	x			
35.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following; 2006 (No receiving date stamp by UTC) Dated 03.14.07 2007 Rec'd. by UTC 03.14.08				
36.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; 2006 – 47,648 2007 – 51,796	x			
37.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and 2006 – 324 2007 - 333	x			
38.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: 2006 / 2007 (A) Inaccurate locate; 19 / 17 (B) Failure to use reasonable care; 115 / 58 (C) Excavated prior to a locate being conducted; or 190 / 68 (D) Excavator failed to call for a locate. 179 / 172	x			
39.	480-93-200(7)(c) PV	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: 2006 / 2007 Rec'd by UTC after 03.29.07 / 03.14.08 (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. 2006 Report was filed after March 15th. The reports submitted are not detailed & do not separate the number of construction defects from the number of material failures. Construction defect types are not identified and type of material failure is not identified. Intent is for operator to provide incident and hazardous failure and defect information for preventative & self audit purposes. Detailed useful information has not been provided or is not available.		x		
40.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	x			
41.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
42.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required Pool of Safety-Sensitive Employees increased by 84 employees from years 2006 to 2007. 2006 rec'd. 03.16.07 2007 rec'd. 04.16.08	x			

Comments:

Received copies of OQ qualifications for Roger Johnson, Donald Cantu, Michael Eutsey, David Cantu.

		CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION	S	U	N/A	N/C
43.	192.16	New customers notified, within **90 days**, of their responsibility for those service lines not maintained by the operator	x			
44.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? New 2008 450CFH@10psig line press for ½". 1" = 855CFH @10psig.1800 CFH EFV Type EFVB ASTM F2138, D2513. PE 3408CD(83)	x			

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
45.	192.383 AOC	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? CNG EFV mandatory effective date June 3, 2008. CNG CP 647 is not yet identified in procedures manual as mandatory yet but training identifies that (EFV) this must be done. Requested copy. 2006 & 2007 Cascade Procedure (CP) 780 offers option. Service installed for 6511 W. 5th Ave., Kennewick did not receive an EFV.Prior to June 3, 2008, voluntary – Copy in file. Procedures manual still says voluntary but after June 3, 2008, they are installing mandatory.		x		
46.	192.383	If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate? **See #44 above.**	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
47.	480-93-013	OQ records for personnel performing New Construction covered tasks Reviewed OQ records for 5 employees. (a) Qualification records shall include: (1) Identification of qualified individual(s); (2) Identification of the covered tasks the individual is qualified to perform; (3) Date(s) of current qualification; and (4) Qualification method(s). (b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years. Donald Cantu, Mike Eutsey, Roger Johnson, Dave Cantu, Dan Hamilton	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
48.	192.225	Test Results to Qualify Welding Procedures(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code " Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s). (b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.	x			
49.	192.227	Welder Qualification All API 1104 Welders up to 12" qualified every 6 mos. – reviewed qualifications David Cantu, Mike Eutsey – All CNG Welding Inspectors went to certification school CNG Division Weld Inspector - Bill Dankno	x			
50.	480-93-080(1)(a)(iv)	Appendix C Welders re-qualified **2/Yr (7.5Months) None**	x			
51.	480-93-080(2)	Plastic pipe joiners re-qualified **1/Yr (15 Months)** Reviewed for Donald Cantu, Mike Eutsey, Roger Johnson, Dave Cantu and prior activity for 2007.	x			
52.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period None	x			
53.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners **1/Yr (12Months)** CNG qualifies once per year.	x			
54.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 None	x			
55.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains No transmission	x			
56.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services Mostly do direct burial. Cascade Procedure - CP 607 Casings & Sleeves. Using foam and do install conduit occasionally. Conduit and sleeve not reported on service as-builts or service records.	x			
57.	192.241(a) PV	Visual Weld Inspector Training/Experience(a) Visual inspection of welding must be conducted by an individual qualified by appropriate training and experience to ensure that: (1) The welding is performed in accordance with the welding procedure; and (2) The weld is acceptable under paragraph (c) of this section. John Wormly National Welding Inspection school. course for visual inspection and company crews visually inspect their own. Just updated to add new OQ for visual inspection – may or may not be in manual. OQ is 2000DOT Visual Inspection of Production Welds – 10826 OQ'd individuals are Roger Johnson 10.11.07 – 2010 David Cantu 10.11.07 – 2010 Mike Eutsey Not OQ'd. – Steve will provide info on Mike – One form in Energy World showed he didn't and one showed he did – he will provide documentation identifying that he has passed. Asked Steve how fix Energy World error – researching how problem occurred. CNG's Ken Nelson has records that Mike passed.		x		
58.	192.243(b)(2)	Nondestructive Technician Qualification Contracted out per job and must be OQ'd per Cascade Procedures	x			
59.	192.243(c)	NDT procedures – Cascade Procedure 760 16.38% SMYS	x			
60.	192.243(f)	Total Number of Girth Welds - None	x			
61.	192.243(f)	Number of Welds Inspected by NDT - None	x			
62.	192.243(f)	Number of Welds Rejected - None	x			
63.	192.243(f)	Disposition of each Weld Rejected - None	x			
64.	192.303	Construction Specifications – Cascade Procedure 607	x			
65.	192.325	Underground Clearance – Cascade Procedure 607 12" or protected, etc.	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
66.	192.327	Amount, location, cover of each size of pipe installed - CP 607.122	x			
67.	480-93-160(1)	Report filed **45 days** prior to construction or replacement of transmission pipelines ≥ **100** feet in length – No transmission	x			
68.	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			
69.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; - None	x			
70.	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 Boundary's along the route - None	x			
71.	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			
72.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed - None	x			
73.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route - None	x			
74.	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			
75.	480-93-160(2)(g)	Welding specifications; and - None	x			
76.	480-93-160(2)(h)	Bending procedures to be followed if needed - None	x			
77.	480-93-170(1)	Commission notified 2 day's prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ **20% SMYS**? - None	x			
78.	480-93-170(7) PV	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) (7) Operators must keep records of all pressure tests performed for the life of the pipeline and must document the following information: (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. Reviewed 09.16.08 records for 4851 W. Hildebrand Blvd., Kennewick which were okay but in review of other records (copies in file), no test duration identified - no detail for new construction installation meeting above requirements.		x		
79.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? (9) Where multiple pressure tests are performed on a single installation, operators must maintain a record of each test. An example of a single installation with multiple tests would be any continuous on-going job or installation such as a new plat or long main installation where more than one pressure test was conducted during construction. None	x			
80.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Received District instrument/Guage Calibration report date 12.21.07 (next due on 12.21.08 per Steve) Calibrated against a Chandler Dead Weight 23-1 certified on 06.01.02) This is for dial gauges only. <u>No details on contractor testing equipment available - See copies in file. Identified this PV under 480-93-015 for lack of documentation.</u>	x			
81.	480-93-175(2) PV	Study prepared and approved prior to moving and lowering of metallic pipelines > **60 psig** - Reviewed Special leak survey for HP 2" main (possibly 250psig) lowering on Road 84, Pascoe but line is >60psig. Engineering study incomplete.		x		
82.	480-93-175(4)	Leak survey within **30 days** of moving or lowering pipelines ≤ **60 psig**	x			

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Comments:

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
83.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline(a) Each operator shall make, and retain for the useful life of the pipeline, a record of each test performed under §§ 192.505 and 192.507. The record must contain at least the following information: (1) The operator's name, the name of the operator's employee responsible for making the test, and the name of any test company used. (2) Test medium used. (3) Test pressure. (4) Test duration. (5) Pressure recording charts, or other record of pressure readings. (6) Elevation variations, whenever significant for the particular test. (7) Leaks and failures noted and their disposition. (b) Each operator must maintain a record of each test required by §§192.509, 192.511, and 192.513 for at least 5 years. Chart information are translated to spread sheets. September 5, 2008: Reviewed CNG Work Order DD013526 – Inlet #114 SLR 99 Richland. 2008 Main installed at 2070 Robertson Dr., Richland., test press: 850psig (seemed too high but review shows on 4" .237 wall is at 19.2% SMYS), duration 19 hrs.: chart reviewed. Nitrogen used and identified for test per O&M.	x			
84.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – **5 years** CNG procedures state use of air for testing unless identified otherwise – CP # 665.026 says "state pressure test records shall include the press of the test and the duration of the test if the test medium is something other than air record the test medium on the form. Revision date October 2006. So prior to this date test medium not included. Requested copies (in folder) that do not show medium used.	x			
85.	192.605(a) PV	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) CNG created CP Review Form for 2008 to prove review date. No documentation prior to 2008 to identify review once per year NTE 15 months. Per Sam UTC identified this issue in 2007 Plans and Procedures audit.		x		
86.	192.605(b)(3) PV	Availability of construction records, maps, operating history to operating personnel Copies kept in district. Maintenance records in Seattle. Services, mains have copies here and placed on computer. Originals go to Engineering. Paper maps here incl. copies. Accurate and up-to-date construction records, leak & atmospheric records are not available to operating personnel. Maps for leak surveys, patrolling, etc.,have not been updated and in some cases not since 1999.		x		

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
87.	480-93-018(3) PV	Records, including maps and drawings updated within **6 months** of completion of construction activity? 224 Bear Dr., Richland – On svc. Card, not on hanging grid maps, not on CAD map 6501 W 6th Ave., Kennewick – On svc card, not on hanging grid maps, not on CAD map 4525 Road 68 Bldg. Unit A, Pascoe – On svc card, not on hanging grid maps, not on CAD map 4525 Convention Pl., Pasco – On svc card, not on hanging grid maps, is on CAD map See details from tablet re: mapping errors. Requested copies of services and mains from records, grid maps and cad maps for reviewed info not completed. Steve stated CAD maps and grid maps are exactly the same. Mike Klapp and Steve also stated that they will add hand drawn information on grid maps. Requested copy of old (no print date) and new (02.28.2008) Kennewick grid sheet which identifies that maps were not updated within 6 months of construction completion.		x		
88.	192.605(b)(8) PV	Periodic review of personnel work – effectiveness of normal O&M procedures (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found. Steve is contacting Sam and will be providing to me. Did not provide.		x		
89.	192.609	Class Location Study (**If pipeline operating at >40% of SMYS)** None operate at 16.8% SMYS – CNG identifies their systems as all Class 4.	x			
90.	192.614 PV	Damage Prevention (**Miscellaneous**) Belong to a one call system Complete with PA portion of inspection. Steve identified that they do not have a listing of local contractors for the Tri-Cities, just a list of those contractors that have caused damage to their system only. **Complete remainder of Damage Prevention questions with PA during Aberdeen Inspection in December.**		x		
91.	192.615(b)(1) PV	Location Specific Emergency Plan (1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures. CNG keeps a copy of their Emergency Shutdown Procedures which includes pressure reduction. Reviewed update records for this manual. Tri-Cities EPlan in the Clerks office in Kennewick – Per Steve, no supervisor receives an individual copy – he identified that the only copy is located in their office and if need information they contact the office. Identified in CP 925 Emergency Policy. The Emergency Policy does not identify outage information but that is included Appendix B of CP 925.		x		
92.	192.615(b)(2) PV	Emergency Procedure training, verify effectiveness of training (2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective. Reviewed Safety Shutdown E procedures manual & how to use 06.26.08 Shut down procedures, 3rd party damage debriefing. Safety meeting minutes, and emergency procedures annually. But nothing identifying effectiveness of training. Requested documentation identifying that Emergency Procedure training completed and verification of effectiveness. Steve will locate information /contact Sam. Not provided		x		
93.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. (3) Review employee activities to determine whether the procedures were effectively followed in each emergency.	x			
94.	192.615(c)	Liaison Program with Public Officials Completing PA w/CNG Aberdeen Std. in December 2008			x	
95.	192.616	Public Awareness Program Completing PA w/CNG Aberdeen Std. in December 2008				

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If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
96.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below: Completing PA w/CNG Aberdeen Std. in December 2008			x	
97.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.				
98.		**API RP 1162 Baseline* Recommended Message Deliveries**				
99.		**Stakeholder Audience (LDC's)** / **Baseline Message Frequency (starting from effective date of Plan)** Residence Along Local Distribution System – Annual LDC Customers – Twice annually Emergency Officials – Annual Public Officials – 3 years Excavator and Contractors – Annual				
100.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.				
101.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. Completing PA w/CNG Aberdeen Std. in December 2008			x	
102.	192.617 PV	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Steve can't answer – said he will check with Sam. Will provide email form and CP – per Sam		x		
103.	192.619	Maximum Allowable Operating Pressure (**MAOP**) CNG O&M Section 665. Class 4 60psig & 500psig	x			
104.	480-93-015(1)	Odorization of Gas – Concentrations adequate Nine Odorizers. Finley, Kennewick Gate, Sandvic- Finley; Pasco Court & Rd. 76; N. Pasco/Trac; Burbank Heights/Attalia; Paterson; Plymoth; Richland Y. Reviewed two of the nine odorizer records: Finley and Kennewick Gate Odorizer records.	x			

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
105.	480-93-015(2) PV	Monthly Odorant Sniff Testing Per Steve: Sniff test locations are chosen by the following: Lg. customers with easy access and high usage. We will be taking sniff tests in the field at S. Olson & 48th in Kennewick; The Fairgrounds Svc. In Kennewick; and the James St. in Pasco. Copy of sniff test locations and CP 747 identifying sniff test locations in folder. No equipment identified on sniff test records so no way to determine whether equipment was calibrated. Reviewed records identifying that their Odorometer was retired in November of 2006 and that they used Yakima's sniff detector but have no records indicating which piece of equipment was used. Extremities of system are not being tested for odorant. Extremities of system identified in CNG Manual – Manual copies in folder. Will complete sniff tests to verify odorant at the following extremity locations next week: S. Olson 48th, Kennewick – Fairgrounds, Kennewick – unable to access for sniff test through appropriate gas fitting James St., Pasco – unable to access for sniff test through appropriate gas fitting Each location identified as an extremity should be sniff tested each month not every 4 months. Locations chosen by GM as extremities for sniff test were chosen using the following method: 1) Large Customer; 2) Easy Access; and 3)High Usage. GM stated they would be surprised to find other requirements in O&M procedures manual		x		
106.	480-93-015(3) PV	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements (2) Instruments used to conduct odorant sniff tests must be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, operators must conduct accuracy checks and calibrate instruments if outside specified tolerances, at least once annually. Reviewed Instrument Repair/Calibration Transmittal Form for Kennewick's Heath Odorator SN# 2000629003 calibration record dated 01.23.08 tested by CNG Meter Shop in Yakima. This odorator's recalibration label was not updated on the piece of equipment and still states recalibration required by 01.26.08. Reviewed Gas Odorization test reports for 2008 January through September – okay & meets WAC "monthly" requirements but no calibration records available for 2007 or December 2006 on any piece of equipment that has been used to conduct sniff tests. No sniff tests conducted have ever identified the piece of testing equipment utilized or its serial number on the monthly CNG Gas Odorization Test Reports (Sniff Test Report). 3 copies of gas Odorization test reports from each 2008 and 2007 are in the folder. Steve has stated that they have never identified the SN or piece of equipment utilized to do sniff tests on their test reports.		x		
107.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Reviewed 2008 records for odorant usage and part of 2007 records – okay. Reviewed annual facility maintenance & inspection records for 2007 and 2008 – Odorizer Station for 9 odorizers (identified above). Some require manufacturers suggested additional pump work during the year at six month intervals but not part of this yearly report.	x			

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
108.	480-93-124(3) PV	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months)** Reviewed Kennewick marker location map – this is the only record of marker locations kept in this District. (3) Where gas pipelines are attached to bridges or otherwise span an area, operators must place pipeline markers at both ends of the suspended pipeline. Each operator must conduct inspections at least annually, but not to exceed fifteen months between inspections, and maintain the markers to ensure that they are visible and legible. Steve is unsure of how marker documentation was handled in the past. Per Steve and Sam, 2007 was the first year markers were reviewed utilizing maps due to notice of a violation during a 2005 inspection (Review Dockets to verify previous PV). They complete their annual pipeline marker survey at the same time as their annual leak surveys. However, leak survey maps are not kept up to date and it can't be documented which main and services have been surveyed and which main and service have been missed. Completing marker surveys in those areas where leak surveying 1/5yrs are completed along with annual and quarterly surveys as required. But said they do cover the markers in areas that are leak surveyed annually and quarterly but unable to document. 1. In Kennewick at Columbia Center Blvd. at two canal xings 2. S. Penn at the canal xing 3. Kellogg at the canal xing, markers were placed 03.03.08 by David/Mike/Roger and documented in the actions taken field of form entitled Operation & Maintenance Request; however, marker locations were not identified on the Leak Survey Maps for this Section as had been identified by Steve as the location to denote the marker locations. (Steve had identified that this is the location that markers were to be denoted.) 4. No documentation available or provided that can identify marker locations for Tri-Cities. 5. No markers outside Finley odorizer or at deflection piping outside Finley odorizer 6. No markers located at the Sandvic odorizer.		x		
109.	480-93-124(4) PV	Markers reported missing or damaged replaced within **45 days?** Cascade Procedure CP# 610 covers pipeline markers. CP# 610.043 states, "The GM must ensure that missing, unreadable, or outdated signs and markers be replaced within 45-days of discovery. It is advised that personnel replace markers during leak surveys and patrols to limit multiple trips." No documentation available that can identify marker locations. Therefore, no way to determine whether markers are missing and no way to determine whether a marker requires replacement. CNG showed me an example of a new map that corporate office is compiling which identifies marker locations but they are not available in Tri-Cities field employees and are not in use yet but GM identified that in the future these maps will be utilized for all future line walks and marker surveys.		x		
110.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on 2) Operators must inspect and test service regulators and associated safety devices during the initial turn-on, and when a customer experiences a pressure problem. Testing must include determining the gas regulator's outlet set pressure at a specified flow rate. Operators must use pressure gauges downstream of the regulator during testing. Safety devices such as fracture discs are not required to be tested. CP # 684.028 (7) New meter installation and regulator work. Reviewed Form 305G Service Request Form for 1811 W. 31st Ave., Pasco.	x			
111.	480-93-155(1)	Up-rating of system MAOP to **>60 psig**? Procedures and specifications submitted **45 days** prior? None	x			

	OPERATIONS and MAINTENANCE RECORDS		S	U	N/A	N/C
112.	480-93-185(1) PV	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? 1) Operators must promptly investigate any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities, received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public. Where the investigation reveals a leak, the operator must grade the leak in accordance with WAC 480-93-186, and take appropriate action. The operator must retain the leak investigation record for the life of the pipeline. Perimeter of leak area has not been documented on the following: 648 Cottonwood Dr, Richland; 3184 Willow Point Dr., Richland; 202 Kranichwood Ct., Richland; 7325 W. Deschutes #B, Kennewick; 5307 Texada Ln., Pasco; 30 S Vancouver St., Kennewick; 6307 W. Rio Grande Ave., Kennewick; 404 S. Dawes St., Kennewick. Leak detection equipment has not been identified on the Service Request forms #305.		x		
113.	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;	x			
114.	480-93-185(3)(b) AOC	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? Gas odor turned out to be gasoline odor in garage at 1207 Canyon Lakes Dr., Kennewick; no documentation/record of follow-up letter sent to this customer; no documentation on form states customer/adult was home and informed. Copy in file.		x		
115.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within **30 days** of a leak repair? None	x			
116.	480-93-186(4) PV	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? Under 480-93-186: Tri-Cities has two Grade 2 leaks that remain Grade 2 and are reviewed quarterly. Lewis St. @ Sycamore St. in Pasco reported on 11.14.07. 1503 Wright Ave., Richland reported 08.09.07. Placed copies in folder for review: it appears not grading leaks at time of detection or assignment of leak grade by personnel completing the evaluation/personal knowledge of leak.		x		

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
117.	480-93-187 PV	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) Each operator must prepare and maintain permanent gas leak records. The leak records must contain sufficient data and information to permit the commission to assess the adequacy of the operator's leakage program. Gas leak records must contain, at a minimum, the following information: (1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the employee(s) conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron); (8) Pipe condition; (9) Type of repair; (10) Leak cause; (11) Date pipe installed (if known); (12) Magnitude and location of CGI readings left; and (13) Unique identification numbers (such as serial numbers) of leak detection equipment. Reviewed CNG Form 286 System Surveillance Record for Richland dated 08.15.07. Leaks were not immediately graded. Leaks for 1527 Thayer, Richland and 1503 Wright, Richland were underground leaks that were not graded until 08.21.07 by GM. No map drawn, no perimeter identified, no barhole or probe locations identified, no CGI identified (they have more than one) and no SN for CGI used to investigate leak. No leak cause identified. Per WAC 187-93-187: Gas leak records must contain, at a minimum, the following information: (13) Unique identification numbers (such as serial numbers) of leak detection equipment – these records do not contain all minimum information such as SN of the leak detection equipment.		x		
118.	480-93-188(1) PV	Gas leak surveys None exceeding 20% per CNG. Tri-City leak survey records insufficient to determine whether over main – services and main missing, no way to determine whether each svc/main were surveyed. Leak survey maps 2-C & 3-C used to survey S. 1 business district in 2007 has hand drawn main and services omitted in 2008 leak survey. Also not effectively monitored. No accurate map available for special leak survey at Rd. 84 – two different map same date same location – no way to determine limits of leak survey this location.		x		
119.	480-93-188(2) PV	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) Leak records are incomplete – CNG form 332 WO do not state whether calibrated FI used for completion of leak investigation at 2620 W Deschutes Ave., Kennewick 05.2.0.08 and 2720 University Dr., Richland 05.20.08. No FI & CGI calib records for leaks at Sycamore & Lewis, Pasco; 1503 Wright Ave., Richland; and 1527 Thayer, Richland..		x		
120.	480-93-188(3) PV	Leak survey frequency **(Refer to Table Below)**		x		

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
	Business Districts **(implement by 6/02/07)**	**1/yr (15 months)** Completed on an annual basis.				
	High Occupancy Structures "High occupancy structure or area" means a building or an outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by twenty or more persons on at least five days a week for ten weeks in any twelve-month period. (The days and weeks need not be consecutive.) DAVE: Agree to disagree on definition of days & weeks need not be consecutive – if have Sunday mtg then could meet 50 Sundays. 5x10=50 in 12 mo. Period. GM identified that both he and corporate view this definition as being consecutive.	**1/yr (15 months) Copies of HO leak survey – they do not include SN for equipment used. Per Steve if piece of equipment is down then use another persons assigned CGI but do not track equipment used because all are calibrated monthly.** Reviewed Public Bldg Insp records for 2007. 321 N. Columbia Center Blvd – Batteries Plus has been removed from list – no explanation since still in business but not on HO list. They provided me with a handwritten list of when the HO's were surveyed and whether removed from the HO list. The Grace United Reformed Church 2500 W. 4th Ave, Kennewick was removed from the HO list on 01.18.08 and no survey was completed in 2008.				
	Pipelines Operating ≥ 250 psig	**1/yr (15 months)** Richland Lateral = 228-240 psig Burbank Heights = 290psig Flame Unit Calibration for these surveys have original signatures on copies (of original calibration records kept with the FI unit) attached to the survey. Asked to see original calibration log sheet. And the 10.22. date written on leak survey sheet was not included on the original calibration record kept with the equipment. Identified to them that this could potentially be a problem at some point down the road by not keeping accurate records in original form on original calibration record sheet kept with unit. Copies in folder of Calibration Records and HP Survey – waiting for a FAX copy of 48240 (have calib. Records for 48101)				
	Other Mains: CI, WI, copper, unprotected steel	**2/yr (7.5 months)** None				
121.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs. Special leak surveys **must** be conducted under the following circumstances: (a) Prior to paving or resurfacing, following street alterations or repairs where gas facilities are under the area to be paved, and where damage could have occurred to gas facilities; The only record they have is for a special leak survey completed with a HP main lowering job in Pascoe of a 100psig main. This survey was completed – have id'd details missed and noted them in #117 above.	x			
122.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred	x			
123.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected None	x			
124.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions None	x			

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
125.	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 1. 1845 Leslie Rd., Richland – no map of barhole locations or Sensit SN used or reads. 2. Rd. 27 & Warehouse Rd., Pasco – map does not identify perimeter, gas reads or locations of reads – the incident occurred on 02.12.08 and repair on 02.19.08 3. Stearman Rd., Pasco – Gas service line severed. – no reads taken, no survey from damage to tie-in identified. 4. 1225 Fuji, Richland – Gas service line damaged – no reads or barhole locations identified – no instrument serial no. identified. 5. 8612 Massey, Pasco – does not identify recording 0% reads before leaving - just that he tightened a cap. Copies in folder.		x		
126.	480-93-188(5) PV	Gas Survey Records Reviewed leak survey maps for 2007 and 2008. On map 2-C, Section 1 Kennewick the 2007 maps do not identify that particular services or mains have been surveyed – only identified that they were complete by writing ex. 2-C on a list with a date; also on this map in 2007 they wrote in services and main that were not on the map but these services and main did not show up on the 2008 leak survey map or that they had been surveyed in 2008. Example 7415 Canal St. – Svc. 7011 Canal St. – Svc, and the main to the east of this service and those services that extend from map 2-C to 3-C. Copies of maps in folder plus the lists identifying that these areas have been surveyed. See # 119 above for HO survey information. No document/records meeting a-f requirements for HO structure leak surveys for Tri-Cities 2007-08. No documents to assure sufficient leak survey completed over top of all Tri cities main and services 2007-08.		x		
127.	480-93-188(6) PV	Leak program - Self Audits Monthly GM Meetings. Review compliance issues and OQ certs. Mapping issue with leak surveys and completion. November 2007 self audit being emailed to me by Sam. No documentation available at time of inspection. No performed self audit – no records indicate/verify that all surveys: HO Special leak surveys/pipelines over/= to 250 & business area leas survey comply with self evaluation requirements for 2007-08.		x		
128.	192.709	Patrolling (Transmission Lines) (**Refer to Table Below**) .705 None	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)

129.	192.709	Leak Surveys (Transmission Lines) (**Refer to Table Below**) .706 None	x			

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

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
130.	192.603(b)	Patrolling Business District (**4 per yr/4½ months**) Copy in folder Reviewed 1, 2, & 3rd Quarter 2008 Form 286 System Surveillance Records: No Exceed 4.5 months between patrolling as follows: Kennewick District dated 12.13.06 with next patrol 04.18.07. Survelience records identify that missing markers occur repetitiously at same locations. Copies in folder. Id markers issues under WAC for markers. (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found. OQ process, review daily work logs/records, & training.	x			
131.	192.603(b)	Patrolling Outside Business District (**2 per yr/7½ months**) 192.721(b)(2) CP-716 – Completed in above quarterly patrol #129. See marker notations above.	x			
132.	192.603(b) PV	Leakage Survey - Outside Business District (**5 years**) 192 .723(b)(1) Reviewed Records for 2007 and 2008. No way to identify that all services have been walked. Paperwork includes a Form 286 System Surveillance Record, Operations and Maint. Request, list of leaks, calib records and maps that do not include the identification of service addresses walked. Not enough info too determine that all services are walked or that because of mapping discrepancies, that all services and main are known by those completing walking survey. Identified under WAC 480-93-188		x		
133.	192.603(b) PV	Tests for Reinstating Service Lines 192.725 1225 & 1211 Fuji, Richland; Did not identify locations that were bar holed before reinstating service line after 3rd Party dig-in. Copy is with 3rd party damage paperwork in folder. PV identified under WAC 480-93-170(4)		x		
134.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 CP 625 Abandonment of Underground Gas Piping.	x			
135.	192.709	Pressure Limiting and Regulating Stations (**1 per yr/15 months**) .739 Reviewed Reg. Sta. annual and 10 year Rebuild inspection report form # 287A Facility maintenance & Piert Rd. =R-39 dated 02.25.08	x			
136.	192.709	Pressure Limiting and Regulator Stations – Capacity (**1 per yr/15 months**) .743 Steve will contact engineering for this documentation showing review by engineering on annual basis. I reviewed Tri-Cities pressure log charts on spread sheets – the original charts are sent to engineering and Tri-Cities inputs their chart reads into their spreadsheets on a weekly basis. Reviewed Annual Regulator Relief Valve Capacity Check Forms dated 08.29.08 for Tri-Cities.	x			
137.	192.709	Valve Maintenance – Transmission (**1 per yr/15 months**) .745 None	x			
138.	192.709	Valve Maintenance – Distribution (**1 per yr/15 months**) .747 Reviewed Valve Maintenance Checklist for 2007 valves V-01 through V-110.	x			
139.	480-93-100(3)	Service valve maintenance (**1 per yr/15 months**) (eff. 06/02/05) Did not have service line valves existing in their system prior to May 19, 2007.	x			
140.	480-93-100(4) PV	Service valve installation and maintenance program fully implemented by 6/01/07? They installed two new valves in 2008 and have not been assigned SLV # to date. Valves are located at Chiawana Highschool, in Pasco (Rd 84 & Argent St.) Written up under 480-93-180.		x		
141.	192.709	Vault maintenance (**≥200 cubic feet**)(**1 per yr/15 months**) .749 None	x			
142.	192. 603(b)	Welding – Procedure 192.225(b) Cascade Procedure (CP) 760	x			
143.	192. 603(b)	Welding – Welder Qualification 192.227/.229 Reviewed Qualifications for David Cantu & Mike Eutsey – they are the only API 1104 qualified welders.	x			
144.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) None	x			
145.	192.709	NDT Records (**pipeline life**) .243(f)None	x			
146.	192.709	Repair: pipe (**pipeline life**); Other than pipe (**5 years**)	x			

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

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.

Comments:

We don't shut customers off to do odor tests.

		CORROSION CONTROL RECORDS	S	U	N/A	N/C
147.	192.453	CP procedures (design, installation, operation, and maintenance) carried out by qualified personnel Design by CNG engineering and via Joe Maxwell Reviewed OQ records for CP validity compiled by subcontractor Energy World.	x			
148.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)* Cascade Procedure 710	x			
149.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)*	x			
150.	192.465(a)	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**) Reviewed Annual CP Surveys for 2008: Kennewick District for Finley/Sandvik dated 03.21.08 identifies a Ground bed Failure with new anodes on order: replacement of anodes completed in July 11, 2008.	x			
151.	192.491	Maps or Records .491(a) Reviewed CP location lists and maps.	x			
152.	192.491	Examination of Buried Pipe when exposed .459 Include condition on various reports. Also have a high pressure dig stand-by form and complete an integrity management dig report. Form CP 625	x			
153.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	x			
154.	192.491	Annual Pipe-to-soil monitoring (**1 per yr/15 months**) .465(a)	x			
155.	192.491	Rectifier Monitoring (**6 per yr/2½ months**) .465(b)	x			
156.	192.491	Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c)	x			
157.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c)	x			

		CORROSION CONTROL RECORDS	S	U	N/A	N/C
158.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) Provided the following low CP reads found during pre-field inspection to CNG 09.18.08 1. Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) 2. 1133 W. Kennewick (Bldg. W of 1133) Field this service a. CP -0.627 3. Riser W of 105 W. Kennewick a. CP -0.26 /CNG read 09.22.08 is -0.870 CNG procedures identify that CP should read -0.90 4. 100 W. Kennewick a. CP -0.58 /CNG read 09.22.08 is -0.860 CNG procedures identify that CP should read -0.90 5. 207 E. Columbia Dr. a. CP -0.23/ CNG read 09.22.08 is -0.860 CNG procedures identify that CP should read -0.90 6. 305 E. Columbia Dr. – no address - Field this service a. 6 Stub risers b. CP -0.556 on stub riser closest to E. Columbia c. Field Info: 305 E. Columbia Dr., Kennewick – low read during pre-field CP -0.556 on meterless riser closest to E. Columbia St./field visit w/CNG found CP -0.733 : Per Steve: this and 5 other meterless risers this location to be retired within the next two weeks. CP Crew and Supv. identified that this service has been low for many years. Check CNG procedures to see if required to remediate no matter what w/in 90 days w/no 100mv shift allowed. 7. 2825 W. Kennewick Ave. – Safeway Building a. Meter set on W. end of complex i. CP -0.016 – all paved area CNG next riser to east is -1.001 Field this service		x		
159.	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. Voltmeters and half cells calibration are up to date. List also includes retired equipment.	X			
160.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/39 months**) .465(e) None	x			
161.	192.491	Electrical Isolation (**Including Casings**) .467 System has total of 123 casings. Reviewed the Annual Casing Survey Report Summary.	x			
162.	480-93-110(5)	Casings inspected/tested annually not to exceed **fifteen months** 05.02.08 and 05.03.07	x			
163.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	x			
164.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within **90 days** Two failed reads were rechecked 04.30.08 with Tinker Razer and determined to pass – problem was related to either a proximity issue or the casing is coated.	x			
165.	480-93-110(5)(c)	Casing shorts cleared when practical None	x			
166.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. **Twice annually/7.5 months**	x			
167.	192.491	Interference Currents .473	x			
168.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)	x			
169.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	x			
170.	192.491	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) .477	x			

	CORROSION CONTROL RECORDS		S	U	N/A	N/C
171.	192.491 PV	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481 Prior to 2006 using meter readers to survey – documentation only occurred on AOC's identified by meter reader. Automated Meter Reading came to Tri-Cities in 2005 so CNG instituted AC Survey Program as follows: Pasco completed AC Survey in 2007. Richland completed AC Survey in 2006. Kennewick will begin their AC Survey in November of 2008.		x		
172.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	x			
173.	480-93-110(3)	CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched)	x			

Comments: **Following info pertains to questions 170-172 above.**

1. 11 S. Dayton (W. Kennewick Ave. S. Side of Alley – E of S Dayton: damaged wrap.
2. 321 W. Kennewick (next reg. in alley of 11 S. Dayton. (319) – AC. Meter reader required corrective action per last AC inspection 01.03.05. No action taken.
3. 313 W. Kennewick – Alley – no coating at interface – AC. Last AC inspection 01.03.05. Meter reader stated okay – no corrective action. Meter reader route # 4580170.
4. 307 or 309 W. Kennewick – Alley – Requested AC information – none provided or available.
5. 217 W. Kennewick – Requested AC information – none provided or available.
6. 213 W. Kennewick – Alley – Bad wrap. Last AC inspection 01.03.05. Meter reader required corrective action – paint. No action taken. Meter reader route # 4580210.
7. 13 S. Cascade – Missing wrap. Last AC inspection 01.03.05. Meter reader route# 4580180 – requested AC information – none provided or available.
8. 205 W. Kennewick – missing wrap. – requested AC information – none provided or available.
9. 113 W. Kennewick (Bldg. W. of 113) – No interface coating/AC/meterless riser in tree stump. Requested AC information – none provided or available.
10. W of 105 W. Kennewick. Chain & metal grate on meter set. Meter reader route # 4580250. Requested AC information – none provided or available.
11. 105 W. Kennewick. Corrosion issue – installation of plastic pop bottle top to keep separation of customer riser and meter casing. Riser impinging upon casing causing stress. GM remediated by removing pop bottle top and kicking customer riser until a small separation existed between the two. This CP remediation technique is not identified in CNG O&M manual. Requested AC information – none provided or available.
12. 100 W. Kennewick – Requested AC information – none provided or available.
13. 202 E. Columbia Dr. – damaged wrap.. Requested AC information – none provided or available. Meter reader route# 4605460
14. 220 E. Columbia. AC and buried valve. Couldn't get in – no evidence of following their unable to access procedure. Requested AC information – none provided or available. Meter reader route#4605650
15. 207 E. Columbia Dr. – AC. Requested AC information – none provided or available. Meter reader route# 4572550 & 4572554.
16. 305 E. Columbia Dr. – Requested AC information – none provided or available.
17. 221 E. Columbia Dr. – AC – Bare metal, no coating on piping. Meter partially buried/buried. Requested AC information – none provided or available. Meter reader #4607600.
18. 2825 W. Kennewick Ave. – Safeway Building. – No interface wrap/AC/no CP read provided due to all concrete surrounding riser. Requested AC information – none provided or available. Meter reader #4607600.
19. 3001 W. Kennewick Ave. – AC on tack-welded supports. Requested AC information – none provided or available. Meter reader # 4530040.
20. 2905 W. Kennewick Ave. – Safeway Bldg. – Damaged wrap. Meter reader Route#4530032 Requested AC information – none provided or available.
21. 2825 W. Kennewick Ave. – Safeway Bldg. – AC – Duct taped flanges. Meter reader# 4530025 Requested AC information – none provided or available.
22. 128 (3017) W. Kennewick Ave. – Safeway Building – AC/damaged wrap/located immediately at bldg. exhaust. Meter reader route #4530045 Requested AC information – none provided or available.
23. 2825 W. Kennewick Ave. – Damaged wrap/tack welded supports/AC. Meter reader route# 4530025. Requested AC information – none provided or available.
24. 1500 S. Oak St. – AC. Four services. Requested AC information – none provided or available.

Washington Utilities and Transportation Commission
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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
174.	192.161 PV	Supports and anchors (c) Each support or anchor on an exposed pipeline must be (1) Free expansion and contraction of the pipeline between supports or anchors may not be restricted. 1. Second riser E. of 128 W. Kennewick. – pipe supports are tack-welded to above ground manifold piping – restricting expansion/contraction of the pipeline between supports. 2. Second riser E. of 128 W. Kennewick - 8 meter manifold hung on customer piping for manifold support 3. 3001 W. Kennewick Ave., Kennewick 4. 13 E. Main St., Walla Walla		x		
175.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	x			
176.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	x			
177.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	x			
178.	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			
179.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified? Did not review this in field.			x	
180.	480-93-015(1)	Odorization Reviewed odorization records dosing amts. Etc.	x			
181.	480-93-018(3) PV See documentation in above regarding maps and availability	Updated records, inc maps and drawings made available to appropriate operations personnel?		x		
182.	192.179	Valve Protection from Tampering or Damage	x			
183.	192.455	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	x			
184.	192.463 PV	Levels of cathodic protection: Staff was unable to obtain satisfactory CP read for 2825 W. Kennewick Ave., Kennewick – CNG was unable to provide a read.		x		
185.	192.465	Rectifiers				
186.	192.467 PV	CP - Electrical Isolation TRI-CITIES LOW CP READS found during pre-field 09.17.08 Provided to Sam Hicks, CNG 09.18.08 A. Corrected reads underlined - completed during field review by CNG CP Greg Miller **(Bold underlined denotes UNSATISFACTORY reads completed during field review by CNG CP Greg Miller)** 1. 1133 W. Kennewick (Bldg. W of 1133), Kennewick a. CP -0.627 b. CNG read -0.943 2. Riser W of 105 W. Kennewick, Kennewick a. CP -0.26 b. CNG read -0.912 3. 100 W. Kennewick, Kennewick a. CP -0.58 b. CNG read -0.860 = this read does not meet CNG minimum identified in their procedures 4. 207 E. Columbia Dr. , Kennewick a. CP -0.23		x		

		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
		b. CNG read -0.861 5. ***305 E. Columbia Dr. , Kennewick*** ***a. 6 Stub risers*** ***b. CP -0.556 on stub riser closest to E. Columbia*** ***c. CNG read -0.733x*** 6. 2825 W. Kennewick Ave. , Kennewick – Safeway Building a. Meter set on W. end of complex i. CP -0.016 – all paved area **ii. CNG did not provide CP read on this riser but next riser to east -1.001** B. The below services were not reported to CNG as low CP reads having met the minimum code standard but reads do not meet CNG minimum identified in their procedures. (Reads taken at site while reviewing other issues w/CNG CP Greg Miller on 09.24.08) 1. 202 E. Columbia Dr. , Kennewick a. CNG read -0.88 2. 1500 S. Oak St. , Kennewick a. CNG read -1.2 C. Other CP reads 1. Intersection of S. Finley Rd. & E. Game Farm Rd., Finley a. CP -0.910 b. CNG read -1.32 at riser in dry soil 2. Intersection of S. Finley Rd. & E. Game Farm Rd., Finley a. CP read on casing -0.238 and -0.230 b. CP on cased pipe -1.300 3. S. Finley Rd., Finley Odorizer a. CP on CNG side -1.085 b. CP on Williams side -1.212				
187.	192.479	Pipeline Components exposed to the atmosphere	x			
188.	192.481 PV	Atmospheric Corrosion: monitoring **Kennewick** 1. Second riser E. of 128 W. Kennewick. – pipe supports are tack-welded to above ground manifold piping – no coating & no access to view AC condition at tack-weld location 2. 3001 W. Kennewick Ave. – Safeway Building a. AC/Tack welded supports onto gas piping – unable to examine pipe coating 3. 11 S. Dayton (W Kennewick Ave. S. Side of Alley – E of S Dayton a. Damaged wrap 4. 321 W. Kennewick (next reg. in alley of 11 S. Dayton) a. Check last atmospheric corrosion inspection 5. 313 W. Kennewick - Alley a. No coating at interface – atmospheric corrosion 6. 213 W. Kennewick – Alley a. Bad wrap 7. 13 S. Cascade a. Missing wrap 8. 205 W. Kennewick a. Missing wrap 9. 1133 W. Kennewick (Bldg. W of 1133) a. Stub riser growing in tree stump b. No interface coating c. S. Corrosion 10. 105 W. Kennewick a. 3 PH b. Plastic pop bottle top used to separate abandoned underground piping as insulator 11. 204-206 E. Columbia Dr. a. Damaged wrap 12. 220 E. Columbia		x		

		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
		a. Check atmospheric corrosion inspection 13. 207 E. Columbia Dr. a. S. Corrosion 14. 221 E. Columbia a. Bare metal – no coating on piping b. Meter buried 15. 2825 W. Kennewick Ave. – Safeway Building a. Meter set on W. end of complex i. S. Corrosion/Atmospheric – no interface wrap – in bituminous 16. 2905 W. Kennewick Ave. – Safeway Building a. Damaged wrap 17. 2825 W. Kennewick Ave. – Safeway Building a. Duct taped flanges on loop 18. 128 W. Kennewick Ave. – Safeway Building a. Damaged wrap 19. Second riser to E. of 128 W. Kennewick Ave. – Safeway Building a. Damaged wrap b. Tack welded supports on gas piping – no way to examine pipe coating 20. 105 W. Kennewick a. Plastic pop bottle4 top used to separate meter from customer piping. b. GM remediated CP issue by kicking customer piping to relocate – not following CNG remediation procedures. **Finley** 1. 43601 S Finley Rd. Odorizer at Williams tap a. Uncoated pipe at interface b. Appears corroded from outside fence c. Supports attached to pipe – unable to check pipe condition under d. No markers outside fence e. No markers at deflection of pipe – see markers N of this location at irrigation/scour xing 2. Intersection of S. Finley Rd. and E. Game Farm Rd. – Horse Shoer Supply a. Buried valve – two valves on building riser b. Corrosion/Atmospheric 3. 222608 E. Game Farm Rd. - Finley Shopper Building a. Corrosion/Atmospheric 4. Finley Odorizer –atmospheric corrosion and peeling paint – not remediated & no documentation AC condition noted at odorant fill times. Last AC in Finley - January 3, 2005 (Exceeds NTE 39 mos. (46 mos.)				
189.	192.491	Test Stations – Sufficient Number .469				x
190.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
191.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	x			
192.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	x			
193.	192.605(a) PV	Appropriate parts of manuals kept at locations where O&M activities are conducted Issues identified under 192.605(a) and (b) - Details in folder		x		
194.	192.605	Knowledge of Operating Personnel	x			
195.	480-93-124 PV	Pipeline markers installed - Markers missing, no remediation timeframes identifiable, no maps, no way to determine whether missing/damaged and remediated, etc. – details in folder.		x		
196.	480-93-124(4) PV	Markers reported missing or damaged replaced within **45 days? No way to determine due to poor state of maps, etc.**		x		
197.	192.707	Warning Signs	x			
198.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**)	x			

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	PIPELINE INSPECTION (Field)		S	U	N/A	N/C
199.	192.195	Overpressure protection designed and installed where required?	x			
200.	192.739	Pressure Limiting and Regulating Devices (**Mechanical**)	x			
201.	192.743	Pressure Limiting and Regulating Devices (**Capacities**)	x			
202.	192.355	Customer meters and regulators. See 480-93-140 below	x			
203.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	x			
204.	480-93-140 PV	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? See regulators protection from damage under 192.355. Details in folder.		x		
205.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) No issues noted	x			
206.	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. No issues noted	x			
207.	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 no issues noted	x			
208.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently?				
209.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? none	x			
210.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? None noted	x			
211.	192.745	Valve Maintenance (Transmission)	x			
212.	192.747 PV	Valve Maintenance (Distribution) Insufficient Valve maint. Documentation to meet this rule for pasco, Kennewick, and richland.		x		

Comments:

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
213.	**.605(b)** No compressor stations for CNG this location.					
214.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			x	
215.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			x	
216.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (**1 per yr/15 months**), prompt repair or replacement			x	
217.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			x	
218.		(b) Tank must be protected according to **NFPA #30**			x	
219.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (**must be performance tested**), unless:			x	
220.		• **50% of the upright side areas** are permanently open, or			x	
221.		• It is an unattended field compressor station of **1000 hp or less**			x	

Comments:
No compressor stations for CNG in this inspection.

			COMPRESSOR STATION O&M RECORDS	S	U	N/A	N/C
222.	.709 No compressor stations for CNG this location.	.731(a)	Compressor Station Relief Devices (**1 per yr/15 months**)			x	
223.		.731(c)	Compressor Station Emergency Shutdown (**1 per yr/15 months**)			x	
224.		.736(c)	Compressor Stations – Detection and Alarms (**Performance Test**)			x	

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Comments:
No compressor stations for CNG this location.

			COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
225.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			x	
226.			Door latch must open from inside without a key			x	
227.			Doors must swing outward			x	
228.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			x	
229.			Each gate located within 200 ft of any compressor plant building must open outward			x	
230.			When occupied, the door must be opened from the inside without a key			x	
231.		(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?**			x	
232.	.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			x	
233.		(b)	Do the liquid separators have a manual means of removing liquids?			x	
234.			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	
235.	.167	(a)	ESD system must:				
236.			- Discharge blowdown gas to a safe location			x	
237.			- Block and blow down the gas in the station			x	
238.			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x	
239.			- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			x	
240.			ESD system must be operable from at least two locations, each of which is:				
241.			- Outside the gas area of the station			x	
242.			- Not more than 500 feet from the limits of the station			x	
243.			- ESD switches near emergency exits?			x	
244.		(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	
245.		(c)	Are ESDs on platforms designed to actuate automatically by…				
246.			- For unattended compressor stations, when:				
247.			▪ The gas pressure equals MAOP plus 15%?			x	
248.			▪ An uncontrolled fire occurs on the platform?			x	
249.			- For compressor station in a building, when				
250.			▪ An uncontrolled fire occurs in the building?			x	
251.			▪ 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	
252.	.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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		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
253.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			x	
254.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			x	
255.	(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	
256.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			x	
257.	.173	Is each compressor station building adequately ventilated?			x	
258.	.457	Is all buried piping cathodically protected?			x	
259.	.481	Atmospheric corrosion of aboveground facilities			x	
260.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			x	
261.		Are facility maps current/up-to-date?			x	
262.	.615	Emergency Plan for the station on site?			x	
263.	.619	Review pressure recording charts and/or SCADA			x	
264.	.707	Markers			x	
265.	.731	Overpressure protection – relief's or shutdowns			x	
266.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			x	
267.		Is aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30?**			x	
268.	.736	Gas detection – location			x	

Documentation Reviewed:

Document Title	Document Number	Revision Date	Date Range Reviewed

Comments:
No compressor stations for CNG this location.