

**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-090076		
Inspector Name & Submit Date	Patti Johnson, 9-9-2009		
Sr. Eng Name & Review/Date	David Lykken 9/11/09		
Operator Information			
Name of Operator:	Avista	OP ID #:	31232
Name of Unit(s):	Pullman/Clarkston Districts		
Records Location:	Pullman/5702 State Route 270, Clarkston/1330 Fair, Clarkston		
Date(s) of Last (unit) Inspection:	8/27-29/07	Inspection Date(s):	6/7-12/09 & 6/21-23/09

Inspection Summary:
 Avista Pullman District and Clarkston District inspections were conducted at the same time. Clarkston is included in this form
 Avista does not have any transmission in district (over 20% SYMS)
 Avista does not use PA11 pe pipe
 For next inspection look carefully at Distribution markers. Avista only replaces distribution markers when an employee notices one is missing and they do not document when they are changed. However, they will do the 5 year marker inspection Avista believes that the 5year inspection to ensure legible and visible is marker inspection.
 Request Friday 6/11/09 the Atmospheric Corrosion Program 6-11pj
 Also request OQ for Atmospheric Corrosion inspectors- 6-30-09 Received and Reviewed
 6/29/09 request 4 for oq training and individual qualification. Received and reviewed.

HQ Address: E 1411 Mission Spokane, WA 99220		System/Unit Name & Address: 5702 HWY 270	
Co. Official: Mike Faulkenbury Phone No.: 509-495-8499 Fax No.: Emergency Phone No.:		Phone No.: Fax No.: Emergency Phone No.:	
Persons Interviewed	Title	Phone No.	
Bill Gest	Gas Leak Survey	495-8501	
Jenny Blaycolk	Palouse Operations Manager	336 6245	
Bob Larson	Cathodic Protection Technician		
Brad Erkelk	Gas Service man		
Kris Busko	Pipeline Safety Eng		
Jodi Morehouse	Gas Measurement, Planning and Compliance		
Bob Larson	CP Tech		
Trevor Salonen	Pressure Control Tech		
Glenn Logsdon	Clarkston Manager		
Jenny Bushnell	Compliance Tech for E Region		
Sonya Johnson	Compliance Tech for W Region		

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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 checked="" type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	5/2007
<input type="checkbox"/>	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 and TransCanada-GTN		
Services: Residential 6048 Commercial 1125 Industrial 0 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 0		<ul style="list-style-type: none"> Number of third party hits last year for state 266 – in 2008 for Avista - Unknown for Pullman/Clarkston Districts 	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 0		<ul style="list-style-type: none"> Miles of main within inspection unit (total miles and miles in class 3 & 4 areas) 180 miles total 75% class 3 no class 4 	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Pullman-Vary from 125 to 500 pounds Clarkston-Gates in Idaho		
Town:	Palouse Albion 500psig, Colton 125 psig, Lacrosse 165 psig, Pullman city feeder 150 psig, Pullman WSU 12 is 383 psig, Rosalie 250 psig, St John is 150 psig, Uniontown 125 psig, Endicott is 150 psig and Pullman E is both 280 psig and 400 psig Colfax 125 psig	Palouse Albion 500psi, Colton 125 psig, Lacrosse 165 psig, Pullman city feeder 150 psig, Pullman WSU 12 is 383 psig, Rosalie 250 psig, St John is 150 psig, Uniontown 125 psig, Endicott is 150 psig and Pullman E is both 280 psig and 400 psig Colfax 125 psig	
Other:			
Does the operator have any transmission pipelines?		x	
Compressor stations? Use Attachment I.		x	

Pipe Specifications:

Year Installed (Range)	Pullman 1968to current Clarkston 1967 to current	Pipe Diameters (Range)	Pullman-½ to 12, Clarkston ½-6"
Material Type	Steel, PE	Line Pipe Specification Used	API 5L
Mileage	Pullman 180 Clarkston 120	SMYS %	Pullman 18% maximum SMYS, Clarkston 15% SMYS

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 6-8-2009**

REPORTING RECORDS

			S	U	N/A	N/C
1.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802)	x			
2.	191.23	Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery	x			
3.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports	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;				
5.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization;	x			
6.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars;	x			

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REPORTING RECORDS			S	U	N/A	N/C
7.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; In Rosalia there was a School evacuation because of Reasonable care at 1000 South Whitman, Rosalia WA	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; 02 settlement review doc	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;	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;	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	x			
16.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	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;	x			
19.	480-93-200(4)(b)	The extent of injuries and damage;	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;	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)	The cost of the incident to the ((operator)) gas pipeline company;	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	x			
31.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure NONE	x			
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;	x			

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36.	480-93-200(7)(b)(ii)	<p>AOC 1. WAC 480-93-200(7)(b)(ii) <i>(7) Each gas pipeline company must file with the commission the following annual reports no later than March 15 for the preceding calendar year:</i> <i>(b) A report titled, "Damage Prevention Statistics." The Damage Prevention Statistics report must include in detail the following information:</i> <i>(i) Number of gas-related one-call locate requests completed in the field;</i> <i>(ii) Number of third-party damages incurred; and</i></p> <p>Finding Avista failed to correctly report the number of third party damages incurred because the definition of damage found in RCW 19.122 and required by WAC 480-93-250 was not used. Updated annual reports were received prior to the formal exit interview.</p> <p>Number of third-party damages incurred; and therefore not an accurate 3rd party damage count do not use WAC 480-93-250 definition of damage 480-93-180 definition of damage not in O&M Do not have accurate count of when pipe wrapped. They say only 20 in Pullman district this is to low will check in depth in Colville inspection. Ran out of time in Pullman inspection</p>		x		
37.	480-93-200(7)(b)(iii)	<p>Cause of damage, where cause of damage is classified as one of the following: (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.</p>	x			
38.	480-93-200(7)(c)	<p>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.</p>	x			
39.	480-93-200(8)	<p>Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities</p>	x			
40.	480-93-200(9)	<p>Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.</p>	x			
41.	480-93-200(10)	<p>Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required</p>	x			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
42.	192.16	<p>New customers notified, within 90 days, of their responsibility for those service lines not maintained by the operator Since 2008 a Mandatory installation, O&M Section 3.1.6 . All services have excess flow valves</p>	x			
43.	192.381	<p>Does the excess flow valve meet the performance standards prescribed under §192.381?</p>	x			

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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
44.	192.383	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? Avista has mandatory program	x			
45.	192.383	If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate? NA, Avista has mandatory program			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	OQ records for personnel performing New Construction covered tasks 1. Were any new tasks developed because of OQ for new construction - NO All crews and contract crews are OQed for everything so they are OQed for new construction	x			
47.	192.225	Test Results to Qualify Welding Procedures NOTE: welding procedures have not changed since 2007, Scott Reviewed. last revision date 4-06.	x			
48.	192.227	Welder Qualification	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)	x			
51.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	x			
52.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) Avista tracks joints, 2007 Reviewed the OQ Record for joints qualified to. Reviewed Plastic Pipe Field Joint Tracking for 9 employees in Pullman For 2008 Reviewed the same records for 9 employees in 2007	x			
53.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 All casing since 1992 have had test leads installed and Avista has put test leads on all other casings in Pullman except the one at Dist Reg Station 309	x			
54.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains NA no transmission			x	
55.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services O&M Section 3.42 page 5 of Sand conduit is mapped	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
56.	192.241(a)	Visual Weld Inspector Training/Experience Reviewed O&M 4.3.1 page 5 of 8 and in appendix A. There is field test during weld test but they also have a standalone required student training (computer based). Avista goes by calendar year for qualification not specific dates for example Mark Allen qualification expired on 1/20/2009 and Avista procedure says as long as he is qualified by end of calendar year 2009 – O&M says 6 months to 3 calendar years -Reviewed OQ list of all qualified for visual inspection of welds -Reviewed BOB JENSON NACE CARD AND OQ FOR TREVOR SALONEN	X			
57.	192.243(b)(2)	Nondestructive Technician Qualification NA Transmission only			x	
58.	192.243(c)	NDT procedures NA Transmission only			x	
59.	192.243(f)	Total Number of Girth Welds NA Transmission only			x	
60.	192.243(f)	Number of Welds Inspected by NDT NA Transmission only			x	
61.	192.243(f)	Number of Welds Rejected NA Transmission only			x	
62.	192.243(f)	Disposition of each Weld Rejected NA Transmission only			x	
63.	192.303	Construction Specifications Section 3 of O&M	x			
64.	192.325	Underground Clearance Section 3.15 page 2 of 6 for plastic and Section 3.15 page 1 of 6 for steel	x			
65.	192.327	Amount, location, cover of each size of pipe installed Section 3.15 page 1 of 6	x			
66.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥100 feet in length NA for Pullman District no transmission			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: NA			x	
68.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; NA			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. NA			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 (2) The report must describe the proposed route and the specifications for the pipeline and must include, but is not limited to, the following items: (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; NA			x	
71.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; NA			x	
72.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. NA			x	
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; NA			x	
74.	480-93-160(2)(g)	Welding specifications; and NA			x	

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75.	480-93-160(2)(h)	Bending procedures to be followed if needed. NA			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? NA			x	
77.	480-93-170(7)	<p>Pressure tests records at a minimum include required information listed under 480-93-170(a-h)</p> <p>PV5. <u>WAC 480-93-170(7) Tests and reports for pipelines.</u> <i>(7) Each gas pipeline company must keep records of all pressure tests performed for the life of the pipeline and must document the following information</i> <i>(a) Gas Pipeline Company's name;</i> <i>(b) Employee's name;</i> <i>(c) Test medium used;</i> <i>(d) Test pressure;</i> <i>(e) Test duration;</i> <i>(f) Line pipe size and length;</i> <i>(g) Dates and times; and</i> <i>(h) Test results.</i></p> <p><u>Charge:</u> Avista did not document all required elements</p> <p><u>Repeat Violation of Docket 070013</u></p> <p><u>Finding a</u> Avista did not document the (g) dates and times at the following addresses.</p> <ol style="list-style-type: none"> 1. 2902 Airport Rd, Pullman completed 7-24-2008 2. Near the intersect of Clark and Parvin Rd, Palouse-Albion, completed 9-17- 2008 3. 1895 SW Barclay Ct., completed 7-24-2008 <p>O&M Section 3.18 page 6 of 7, does not include (g) times of test. DOUBLE CHECK THINK THIS OMISSION CREATED PV FOR NOT HAVING – Discussed during inspection</p>		X		

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CONSTRUCTION RECORDS		S	U	N/A	N/C
	<p>The chart is the pressure test for HP jobs Reviewed starting Chart SR 270 project ¾ at 7600 to 21300 (a) Avista name not on chart, co doing pressure test name is on the chart (b) contract employee name only (c) test medium used not on chart it is in the specs (d) test pressure no written but can be read (g) dates and times not written on chart, could just put chart on (h) test result determined by reading chart Kris said whole As built project is the records. The medium is in the specs, Kirs email question Still looking a pressure charts. On chart 21310 to 21500 for SR270 job. Where the direction to pressure test for 24 hours at 600 psig? Kris email question I am reviewing pressures. On the charts for the SR270 job, are the following Avista employees or contract employees</p> <ol style="list-style-type: none"> 1. D. Howell 2. J Bell (I think that is the name), signature found on chart from 7600 to 21300 and again on chart from 21500 to 26100. <p>Above information and chart is good the information is part of the job specs.</p> <p>Reviewed Chart SR 270 project starting at 21500 to 26100 (a) Avista name not on chart, co doing pressure test name is on the chart (b) contract employee name only ???? (c) test medium used not on chart it is in the specs (d) test pressure no written but can be read (g) dates and times not written on chart, could just put chart on (h) test result determined by reading chart Above information and chart is good the information is part of the job specs.</p> <p>Reviewed Chart SR 270 from 21310 to 21500 PV (a) (a) Avista name not on chart, co doing pressure test name not on the chart (c) test medium used not on chart it is in the specs (d) test pressure no written but can be read (g) dates and times not written on chart, could just put chart on (b) contract employee name only ???? (d) pressure determined by reading chart not written (h) read the chart for results Above information and chart is good the information is part of the job specs.</p>				

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CONSTRUCTION RECORDS			S	U	N/A	N/C
		<p>For Intermediate jobs - services Service At 1895 SW Barclay Ct Pullman on 4-21-09 had map update signature on it (e) duration missing (g) times missing</p> <p>Service at 1. 215 Barclay Ct Pullman, 6-27-07 and 2. 205 Barclay Ct Pullman (c) test medium (h) test results NOTE NEW FORM MADE IN 2008. New forms have space for medium and test results, times and duration and crews didn't fill all spaces. Previous pv FOR 2007 UNTIL NEW FORM.</p> <p>For Intermediate main extensions Main at 2902 Airport Rd 5-1-08 (g) Dates and times; missing (h) Test results. missing For this he hand wrote start time but on Avista sticker on main start and finish times not included</p>		x		
78.	480-93-170(9)	<p>Individual pressure test records maintained for single installations where multiple pressure tests were performed? Reviewed See above</p>	x			
79.	480-93-170(10)	<p>Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) <i>not following manual 192.13 (c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.</i> 2-24-09 crew inspection of Trevor Salonen crew at Lacrosse Gate station. He had a new Honeywell 0-15 gauge with no tag with an expiration date. His new gauge, SN 1247889 had the manufactures calibration. No sticker- O&M Section 5.21 page 6 of 6 states "The equipment shall be tagged with the calibration expiration date. It Is the users' responsibility to put on tag. No PV discussed during mini exit interview</p> <p>480-93-018 (1) Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.</p> <p>Honeywell 0-15 gage Avista did not have documentation stating that the gauge was calibrated or when it went into service. Avista requested and received the Tri Pacific Supply fax cover page 2nd page and invoice with purchase that had the manufacture fax certificate and invoice during the inspection reviewed this information during the mini exit interview</p> <p>0-300, SN 101884 – CALIBRATED ON 1-5-07, DUE 1-5-08 CALIBRATED 11-24-08, DUE 11-24-09</p> <p>Avista said they are missing calibration records for 2008, they are getting the missing information-they say they know they were calibrated KRIS On truck has 0-750, 0-300 and 0-15 for Trevor, pressure control man 0-750, SN 967787 –</p> <ul style="list-style-type: none"> • CALIBRATED 12-17-2007, DUE 12-17-2008 • Calibrated 11-24-08, Due 11-24-2009 <p>2 of the above dates are late, but wording in O&M uses computation of time definition of annual so it is ok</p>		x		

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80.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig (over 2") - Reviewed Stress Calculation for Minimum distance for a. 60 psig job at South Grand Pullman b. job near Clark and Parvin, 4" off set	x			
81.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig Reviewed during leak survey for above 200 feet for a. S Grand project in Pullman. b. job near Clark and Parvin, 4" off set	x			

Comments:

1. 192.353 –Mentioned in the Mini Exit interview

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

Incident #2003 at 3110 Chattaroy Rd, Spokane is concern of snow causing meter damage. .This reportable incident caused a fire because of snow. Avista O&M 2.22 2 of 16 says meters should be protected from corrosion and damage such as snow etc. Avista working on plans.

This snow on meter problem was noted during inspection 2. 2/26/09 in Pullman at Hwy 27 and Wheaton maybe business district. At Carlson's Plumbing mtr 109212 is metal roof, no overhand, when I was there snow slid off the roof and directly onto the meter. Next door at Auto Truck Repair meter was behind fence so I couldn't get to it but it had 1" of snow on it, no overhang. The night before it had snowed about 1 to 2". This combined with incident 2003 at 3110 Chattaroy Rd, Spokane is concern of snow causing meter damage. Notified Avista that I witnessed 2" of snow coming of building

2. In St John a vent extend up wall made out of conduit. Found during pre field and before inspection Avista removed and stated was not in accordance with the O&M

3. At Wallace Grain and Feed, 620 Spokane Ave, Palouse is farm tap on meter riser. Meter set covered with grain chaff (glue to it). I could barely identify vent. it was totally plugged. There was an Avista crew a block away, asked crew to look at meter with me. (Crew was Mark Allen Journeyman and Jim Woods a crewman) They scrapped of reg vent with pocket knife – to me I though chaff was still in it. The vent was sideways. The riser had wrap one inch above the ground and appeared to have bare exposed pipe. Crew scrapped and there was exopy coating on riser pipe Crew wrapped riser. ALSO this meter is on metal building with no eve to protect it from the snow. Building maint person said they had chaff overflow and everything except meter was hosed down. Avista is currently under order to have all sideway vents replaced by July 1, 2010. This sideway vent was corrected before the inspection began.

During the atmospheric corrosion portion where Avista realized they had not considered commercial and residential meter sets for sideway vents when they developed their plan to correct all sideway vents by July 1, 2010. They were going to do so.

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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	x			
83.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted. January 2009 new O&M published, so it was reviewed in fall of 2008. Pullman 700 Reany Way, Parkview Apts was installed in 1967. Grandfathered in, this is prior to O&M revision. See O&M Section 3.16 page 7 of 14 - ok	x			
84.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel All have O&M on truck and an order which has all other information. If missing information they call office or get from office	x			
85.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? AOC 2 CFR 480-93-018 (5) Records (5) Each gas pipeline company must update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel. Finding Avista could not document that its maps were updated within six months of when it completed a construction activity. Avista's computerized mapping system did record the date each facility was mapped. However, the same data field was used to capture the date a facility was viewed in the mapping system. Consequently, the map entry date was lost in many instances. Prior to the exit meeting, Avista committed to save the map entry date before the end of 2009. In some cases there is no way to know things were mapped within 6 months. The system does have an install date that reflects the official mapped dated. Note jobs are designed on the mapping system and invisible until installed that is why it doesn't say posted. – Took 45 minutes for Avista to figure this out AOC not a probable violation so it is satisfactory	x			
86.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures As part of O&M review, Engr asks every manager to have an employee review the O&M. Form O&M Recommended Changes used. Each district includes work around procedures. To ensure the way it is done is in the O&M. Reviewed request to Manager and reviewed 2008 forms that have resulted in O&M revisions.	x			
87.	192.609	Class Location Study (If pipeline operating at >40% of SMYS) NA			x	
88.	192.614	Damage Prevention (Miscellaneous) Belong to local one call.	x			
89.	192.615(b)(1)	Location Specific Emergency Plan Pullman/Clarkston- On site in detailed emergency plan, on truck is procedures Part of O&M	x			

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90.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training Pullman answer Mock emergencies last one here was at Moscow gate, all of public liaisons participate. Avista has roster of who is there. Clarkston answer Manager review of greens, analysis the information and provided feeds back to employee .Safety and Training Dept for near misses and incidents sends alerts to all employees including vehicle incidents and monthly safety meetings. Review Safety Health and Craft Training an Injury /Incident Notification for 5-8-09 Spokane and Safety Alert for 1-27-09		x			
91.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Review Avista trouble orders. Reviewed Gas Leak Monthly Report for mains and services. For report, greens for blowing gas for 3 rd party only and whites are for gas odor -this report for leaks only. The numbers on this report make the number for Avista used for the annual Damage Prevention report – knock off coating etc is not included in report. This was AOC 1 2009 is now all electronic, so the old greens are electronic. The exposed pipe that has the unreported damaged coating is pending to become electronic Repair to WA Avista, covers steel repair Section 3.32 page 5 or 7, Does not include wrap. Damage wrap is documented on steel pipe report. Does not use 19.122 definition of damage in O&M For Clarkston – same as Pullman and Part of analysis above and they do mock emergencies and this winter did overview of EOP plan with employees. Reviewed Attendance Roster for EOP review for all 7 Clarkston gas employees.		x			
92.	192.615(c)	Liaison Program with Public Officials District Manager goes to Fire departments, council meetings and they all liaisons and some public officials participate in mock training. Reviewed roster of Public Authorities Training. Reviewed photos of mock emergency. Reviewed WA State Excavator notification list for 2008 For Clarkston Glenn or Bill or one of the other 2 CPCs who participate in all		x			
93.	192.616	Public Awareness Program					
94.	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:		x			
95.		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.					
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- Done as bill stuffer, news paper, radio spots,				
		LDC Customers	Twice annually-same				
		Emergency Officials	Annual-reviewed letter, emergency official letter and brochures				
		Public Officials	3 years- reviewed letter last one sent in 2008				
		Excavator and Contractors	Annual – Reviewed list of contractors and brochures and buy advertising for Spokane home builders etc.				
98.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.					

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99.	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. Multiply languages English and Spanish	x			
100.	192.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Avista Pullman hasn't had any damage that required laboratory analysis in 2007 or 2008. O&M Section completed a couple of times under O&M damage Section 5.11 and Emergency Manual. <ul style="list-style-type: none"> Material failure report that comes from field personnel with the component. This could lead to sending out for laboratory analysis, whatever it is 	x			
101.	192.619	Maximum Allowable Operating Pressure (MAOP)	x			
102.	480-93-015(1)	Odorization of Gas – Concentrations adequate Reviewed in Pressure Control book and in Monthly Odometer Test In Clarkston 2 odorizes both in Idaho	x			
103.	480-93-015(2)	Monthly Odorant Sniff Testing In 2009 Annual Odorant Sampling Test Point Review. As a result, 5 new test sites were added and 3 old ones removed. Reviewed the 15 test sites for 2007 and 2008. NOT CORRECT SECOND WEEK THERE ARE 15 TEST SITES FOR 2007 AND 2008. IN 2009 5 NEW ONES ADDED AND 3 OLD ONES REMOVED for 17 SITES IN 2009 NEEDS TO SEE HOW MANY TEST STATIONS IN EACH TOWN, IN ALBION 1 TEST SITE COLFAX 1 TEST SITE IN 2007 AND 2008 WAS 1 IN 2009 IS 2 SITES COLTON 1 TEST SITE ENDICOTT 1 LACROSSE 2 IN 2007 AND 2008 HAD 2 IN 2009 HAVE 1 PALOUSE 1 PULLMAN HAS 5 IN 2007 AND 2008 AND IN 2009 HAVE 7 ROSALIA 1 ST JOHN 1 UNIONTOW 1 Section 4.18 page 1, point shall be In Clarkston Reviewed 2007 report it had 2 sites in Clarkston and one in Asotin .Reviewed 2008 3 sites in Clarkston and one in Asotin and in 2009 3 sites in Clarkston and one in Asotin. Does cover 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 Pullman None in the last 3 years. Process is O&M Section 4.18 page 2 Clarkston No low or high odorant reads for 2007, 2008 or 2009	x			

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105.	<p>Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)</p> <p>Reviewed Odor meter calibration and DTEX which Pullman started using in 2009 DTEX in use 1-9-09 calibrated 1-9-09. YZ Systems. manufacture says this requires a 2 year calibration. BUT Avista annually standard will require one year.</p> <p>O&M Section 4.18 page 9 of 9 says annually or as required by the manufactures Section 4.18 page 7 of 9 says YZ is DTEX is manual contradicting itself. DTEX has 2 year manufacture calibration requirement. AND "The YZ odor meter should be calibrated at least on an annual basis or as required by the manufacturer." O&M confusing and Avista has agreed to revise it in 2009.</p> <p>Calibration of Odor meter in Pullman</p> <ul style="list-style-type: none"> • SN 119 done 1-26-07 due 1-26-08 • SN 119 done 1-23-08 due 1-23-09-----PV • SN 119 done 1-28-09 due 1-28-10 • SN ZF1019 done 2-20-07 due 2-20-08 • SN ZF1019 done 1-23-08 due 1-23-09-----PV late • SNZF1019 done 2-24-09 due 2-24-10 <p>480-93-012 Computation of time – Annually means any time within the calendar year. Avista uses the computation of time definition of time for calibration so the dates are not late</p> <p>Reviewed all odometers including Bacharach odometers</p> <p>In Clarkston reviewed the Heath certificate of calibration for Bacharach, Serial Number 377 dated 1-22-07 for 2008 dated 2 21-08 for Bacharach Serial Number 377 and for 2009 have for Bacharach Serial Number 377 dated 2/22-09 , They have their own DTEX, serial Number 1231, and it is a 2 year calibration schedule, it has not been 2 years due for calibration. Reviewed Certificate of Calibration calibrated 12-30-08 and due 1-29-10.</p>	x			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
106.	480-93-124(4)	<p>Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) 480-93-124 (1) Each gas pipeline company must place pipeline markers at the following locations: (a) Where practical, over pipelines operating above two hundred fifty psig; (b) Over mains and transmission lines crossing navigable waterways (custom signage may be required to ensure visibility);—One in Clarkston, none in Pullman (c) Over mains and transmission lines at river, creek, drainage ditch, or irrigation canal crossings where hydraulic scouring, dredging, or other activity could pose a risk to the pipeline (custom signage may be required to ensure visibility); If water not running all the time, Pullman calls it a ditch and trench through it, which is mainly what they have. If water running all the time called river or Canal. If hydraulic scouring is possible Pullman install at least 4 feet deep and usually deeper than that. No canals have water running all the time. (d) Over gas pipelines at railroad crossings; This is Avista 5 year report. The next distribution done once every 5 years. There is a program under way to GPS these markers and next patrol is done 2010. Last one done 2007. This done with Leak Survey.</p> <p>5 year markers on maps. 2007 5 year survey put done and those put on maps. There is a layer for markers on maps. In Colfax the maps have been turned off.</p> <p>Avista replaces markers they see are missing but does not document missing markers. They say they will review every 5 years but that every 5 year WAC is to ensure markers are visible and legible. 192 requires that markers be maintained. Also, Avista hired a contractor when rule went into effect to cps every marker. The overlay map with the markers was turned off for Colfax and we could not access during the inspection.</p> <p align="center">Review marker on maps from 1st five year inspection. Note now some towns have the marker level turned off</p> <p>IN Clarkston fielded River crossing sign on each side of river</p>	x			
1.	480-93-124(5)	<p>Markers reported missing or damaged replaced within 45 days? Trevor does HP patrol (everything over 60psig) and he replaces markers when found missing. Other markers are replaced when an employee notices one is missing. Distribution markers replacement is not documented.</p> <p>AOC 4. WAC 480-93-018 (1) Records. (1) Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.</p> <p>Charge: Avista does not maintain records sufficient to demonstrate compliance.</p> <p>Finding During the inspection, Avista stated during its annual HP survey, the Pullman District did not document that pipeline markers were replaced. Note: AOC not probable violation so they are satisfactory</p>	x			
2.	480-93-140(2)	<p>Service regulators and associated safety devices tested during initial turn-on</p> <ul style="list-style-type: none"> • Inspected manometer during crew inspection • Reviewed report with all meter installs. O&M Emergency manual <p>Section 7 is meter turn on page 2 of 4 In Clarkston Flow and Lock up report reviewed in Pullman - and Reviewed The Clarkston Flow Lockup Report. Noted on every meter installed.</p>	x			
3.	480-93-155(1)	<p>Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None planned.</p>	x			

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OPERATIONS and MAINTENANCE RECORDS		S	U	N/A	N/C	
4.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? Clarkston Greens are entered directly into computer by service man (1st responder) for emergency leaks. When blue when Heath finds in survey they do perimeter. And Heath must stay if grade 1 until someone resounds.	x			
5.	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 in Pullman In Clarkston Greens Reviewed 713 16th St in Clarkston	x			
6.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? In 2008 sent 2 for the whole state, none in Pullman	x			
7.	480-93-186(1)	Leak evaluations: Location and/or magnitude of a leak, the gas pipeline company must assign one of the leak grades defined in WAC <u>480-93-18601</u> to establish the leak repair priority.	x			
8.	480-93-186(2)	Leak evaluations: Determine and document the perimeter of the leak area. Was investigation extended to inside the building if leak extended to building wall? 1. Review form for Q 117 2. Adequate space for drawing 3. Beginning and ending CGI reads 4. CGI calibration 5. Leak grades follow O&M REFERENCE and code Heath calibrates daily reviewed records Rover instruct from Baskin Turner in manual and from meter to service Example 1315 NE Orchard Dr Pullman Code 9 blowing gas. Used Rover #3 one probe 15 feet towards svcs to main tie end (with Rover would mean entire service). Started as grade 1 when reported as dig in with leaking gas. No read taken when blowing gas upon arrival at site, only after repair is completed. Did flow and lock up as part of repair Code 5 is odor call. 1365 Bradi Way Pullman, little stars on map indicate bar holes. Cust called in gas leak at main repaired needed recheck. Good AFM (Avista Facility Management System), the mapping system, tracks repairs. Maps include has bar holes, has all information including rechecks. Air test and leak survey back to main. Leak survey from break back to main. WAC 488 4 e. Per records they do not do leak survey from break to main but they bar hole all the way to the main. Reads are recorded and mapped. Every bar hole is mapped with read. more stringent Example of dig in with exposed pipe - at this point exposed pipe is not on mapping system AFM- Avista Cannot tie exposed pipe report to a job on mapping system (reason for doing read unknown) but can tie mapping system to exposed pipe. Same in Clarkston no need to look at in Clarkston	x			
9.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? SEE JOBS REVIEWED 1 late 30 day residual rechecks –Mentioned in Mini Exit interview a. 635 Guy form #119	X			

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10	480-93-186(4)	<p>Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? REQUESTED TO SEE MANUAL FOR HEATH, LOOK SPECIFICALLY FOR WHEN 2 PEOPLE ARE USED, HOW DO THEY KNOW THEY GO OVER MAIN – only on transmission does a locater walk in front of leak surveyors.</p> <p>Distribution MAINs. Maps are available with main location dimensions. Can call for locate if unsure of main location</p> <p>Reviewed How to stop and start in middle of map ok</p> <p>Grading ok Pullman Practice is to repair immediately, do not carry forward more that 2 or 3 weeks.</p> <p>Clarkston has one that was a grade 2 and not yet replaced and downgraded it after review. Is in Lewiston, downgraded leak still in time frame but are part of replacement project to be done soon. Downgrade is ok one time.</p>	x			
11	480-93-187	<p>Gas leak records: at a minimum include required information listed under 480-93-187(1-13)</p> <p>Each gas pipeline company must prepare and maintain permanent gas leak records. The leak records must contain sufficient data and information to permit the commission to assess the adequacy of the gas pipeline company's leakage program. Gas leak records must contain, at a minimum, the following information:</p> <ol style="list-style-type: none"> (1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the person conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron); (8) Pipe condition; THIS IS NOT ON THEIR LEAK SURVEY LOCATION REPORT SEE N012. but is available (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. <p>Review doc - this was pv in 02 settlement</p> <p>On Leak Survey Location Report filled out for repairs pipeline classification is determined by drawing (there is no transmission in Pullman or Clarkston) – THIS IS IN THE MANUAL PER BILL GEST</p> <p>One Leak Survey a leak found at 635 Guy, did not have the CGI serial number (13) on the form. –Mentioned in Mini Exit interview only</p> <p>When leak found during leak survey, they do not have exposed pipe condition. Most leaks are above ground and if they need to be dug up there is a note on the leak survey form and the O&M states “leak repair work orders shall be retained with the leak survey report.” ok</p>	x			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
12	480-93-188(1)	Gas leak surveys Reviewed annual, HOS, and Five year for both Pullman and Clarkston NOTE: Mapping system has HOS color coded on maps that do not have annual surveys. On all other maps Avista cannot identify HOSs. Mapping system cannot create list of HOS mapped locations.	x			
13	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) CGI -FLAME PACK 480-93-188 (2) • Contractor does leak survey, calibration information is on the survey map. FI calibrated every day.	x			
14	480-93-188(3)	Leak survey frequency (Refer to Table Below)		x		

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

1. WAC 480-93-180 (1) Plans and Procedures

Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

Charge:

Avista's Operations and Maintenance (O&M) Manual did not include plans and procedures for a WAC 480-93 requirement.

Finding(s):

Avista's O&M Manual does not include a method to identify high occupancy structures.

AVISTA HAS ONE UNDER WATER CROSSING in Clarkston. IS LEAK SURVEYED ANNUALLY THE UNDERWATER PORTION IS IN CLARKSTON AND LEAK SURVEYED BY GLEN

- In Pullman reviewed all Pullman and Clarkston In 2007 Clarkston had 5 year, 2006 5 year for Asotin

ALBION

- HOS and Buss Dist – Meter 227922, between 2nd and E; 2nd and F; 3rd and E and 3rd and F. Library, Police, City Hall, City maintenance and park. Person there said over 25 often because of work and all community events there. This was an old school Reviewed 5/9/08 BY Marshall Crawford

COLFAX CONT.

- Golf course has review annual 5-19-08 by Lyle Christian leak survey
- Colfax Little League Park, gas line runs by RD HOS - "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.) reviewed OK on the rd
- Colfax Golf Club – more than 25 people on course the day I was there. Runs by rod and may have bare pipe riser?

PULLMAN

- Strip Mall at Bishop Blvd and Pro Mall- 2008 annual survey, Pullan SE map 5/21/08 by Tom DeGroot
- Palouse Presbyterian Church at Bishop Blvd and Pro Mall SAME
- Summitt and Bishop, 1620 SE Summit Ct, Pullman is Care Community, gas vents on roof done 5/22/08 Tom DeGroot pj
- Pullman Moscow Regional Airport HOS and Buss Dist??? In done 5/14/2008 by
- ON 6/8 REQUEST OQ RECSORDS FOR TOM DEGROOE AND SKYLER DOMPIE and Marshall Crawfore – ok Avista uses definition of annually in O&M

Into Port of Whitman County, Industrial Park. Approx 14 bldgs. Definate Buss Dist on Hopkins from Hickman, 0 on Nelson Ct, 1 on Hickman, Three Fork Othopedics – no one there that day may be vacant Reviewed done on 5-14-08 by Marshall Crawford

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15	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs No special leak surveys are conducted unless there is a specific reason.	X																		
16	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred None and Section 5.11 page 6	x																		
17	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected None and Section 5.11 page 6	x																		
18	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions Section 5.11 page 6	x																		
19	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in This was pv in 02 settlement review doc Avista does bar holes instead of leak surveys	x																		
20	480-93-188(5)	Gas Survey Records	x																		
21	480-93-188(6)	Leak program - Self Audits Reviewed form internal self audit of leak records, headquarters has a leak per mile start etc.	x																		
22	192.709	<p>Patrolling (Transmission Lines) (Refer to Table Below) .705 Maximum interval between patrols</p> <table border="0"> <tr> <td>Class</td> <td></td> <td></td> </tr> <tr> <td>Location of line</td> <td>At highway and railroad crossings</td> <td>At all other places</td> </tr> <tr> <td>1,2</td> <td>7 1/2 months; but at least twice</td> <td>15 months; but at least once each calendar year</td> </tr> <tr> <td>3</td> <td>4 1/2 months; but at least four times each calendar year</td> <td>7 1/2 months; but at least twice each calendar year</td> </tr> <tr> <td>4</td> <td>4 1/2 months; but at least four times each calendar year</td> <td>4 1/2 months; but at least four times each calendar year</td> </tr> </table> <p>5.15 PAGE 6, Once Avista realizes a marker is missing the 45 days begins. Avista practice is to just replace markers.</p> <p>Clarkston Asotin</p> <ul style="list-style-type: none"> Dist Reg #407, 2 sideway vents, what kind of wrap up legs <p>6 District Reg stations , Reviewed Regulator Station Inspection and maintenance Record Station 407 3-31-08 and done 5-5-09, 250 maop Station 417 done 4-3-08 and 5-4-09, 300 maop 431 3-31-08 and done 5-5-09, 250 maop 432 4-2-08 to 5-5-09 250maop 434 3-31-08 to 5-5-09 250 maop- this is farm turned dist reg 440 4-2-08 to 5-13-09 250 maop</p> <p>No other farm taps in Clarkston</p>	Class			Location of line	At highway and railroad crossings	At all other places	1,2	7 1/2 months; but at least twice	15 months; but at least once each calendar year	3	4 1/2 months; but at least four times each calendar year	7 1/2 months; but at least twice each calendar year	4	4 1/2 months; but at least four times each calendar year	4 1/2 months; but at least four times each calendar year	x			
Class																					
Location of line	At highway and railroad crossings	At all other places																			
1,2	7 1/2 months; but at least twice	15 months; but at least once each calendar year																			
3	4 1/2 months; but at least four times each calendar year	7 1/2 months; but at least twice each calendar year																			
4	4 1/2 months; but at least four times each calendar year	4 1/2 months; but at least four times each calendar year																			

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23	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706	x															
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24	192.603(b)	Patrolling Business District (4 per yr/4½ months)	x															
25	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) HP PATROL REVIEWED GAS PATROLLING REPORT 2008 FOR PULLMAN DISTRICT	x															
26	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) Reviewed see leak survey quest notes	x															
27	192.603(b)	Tests for Reinstating Service Lines 192.725 Pressure test from break to meter, etc. If reenergized anywhere same as new installation. Section 3.16 and 3.18	x															
28	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 Pullman has no commercially navigable waterways. Clarkston does not have any abandoned underwater facility in navigable waters, they do have one in navigable water	x															

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OPERATIONS and MAINTENANCE RECORDS		S	U	N/A	N/C
29	192.709				
	<p>Pressure Limiting and Regulating Stations (1 per yr/15 months) .739</p> <p>PV4. CFR 192.739 Pressure limiting and regulating stations: Inspection and testing.</p> <p><i>(a) Each pressure limiting station, relief device (except rupture discs), and Pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is-</i></p> <p><i>(4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.</i></p> <p>Charge: Avista's Mooney Series 20 and/or 20S Pilot vents do not protect from dirt, liquids or other conditions that might prevent proper operation.</p> <p>Finding Avista does not protect the Mooney Series 20 and/or 20S Pilot vents from dirt, liquids or other conditions that might prevent proper operation. Staff understands Avista orders and receives pre-assembled regulators that include Mooney Series 20 and/or 20S Pilots for use in district regulator stations. Avista installs the pilots as received. Each of these pilots installed in the field has a sideways vent that would allow dirt or liquid to build up. A search of Mooney's Installation/Operation/Maintenance Manual for Series 20/20S/20H/20HS Pilots states "It is recommended that the vent connection face down when the pilot is mounted on the regulator so that condensation will drain away instead of accumulating and possibly freezing."</p> <p>Trevor does everything at the regulator stations. Gets help when needed. Makes his own annual schedule.</p> <p>notes that paint is ok but does note atmos inspection done, wrap, corrosion</p> <p>Reviewed all Regulator Station Inspection and Maintenance Records for Pullman OK NOTE some are within 2 weeks of the 15 months</p> <ul style="list-style-type: none"> • Is 3003 farm tap a Dist Regulator? At 7151' Hwy, no Dist reg or. Bad interface water in wrap, sideways vent. –stub in front of next house, didn't see farm tap, where is it served from? There is marker near yellow green house, does it have gas where is it feed from? At white house didn't see meter saw roof vent over hill from 6301 Palouse albion Rd. Next house is red with test station, didn't see meter , saw marker – Fielded ok there are other farm taps that cannot be seen except from house yards. OK • Is Dist Reg 3007. Not on dist reg list is at Shawnee Rd and Palouse Albion Rd During inspection determined this is only farm tap <p>PULLMAN</p> <p>Dist Reg 358. Farm tap at Quality Inn, riser buried below valve, sideways vent – these were corrected during field inspection. District Reg valve. At best under bark, area built up for landscaping that is why dist reg is so far below ground level. Before site was fielded this was concern because shutting it down on farm tap would be safety concern. Ok with curb valve</p>		x		

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30	192.709	<p>Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 192.743a) WAS PAST pv</p> <p>Note: some locations listed here were reviewed with atmospheric corrosion.</p> <p>Lacrosse - #314 and 325. OK now crew corrected and explained all during crew inspection.</p> <ul style="list-style-type: none"> • #314 had sideways vent • Eliminated wick odorizer- crew replaced. • Feed from TransCanada GTN. Called LaCrosse Meter Station • By pass not locked prior to crew inspection? • Atmospheric corrosion- corrected • Bad and dinged wrap - corrected <p>Endicott</p> <ul style="list-style-type: none"> • Williams Gate (not Williams usual color) outside of town (see map). • No Avista sign on fence. Don't believe any equipment there, plz explain how this works? – sign on fence inside of Williams fence • At Williams is a corrugated round box in ground, with Avista sign, have seen valve in them before??? -There is an odorizer in it. Not fielded with Avista due to time limits • Reviewed records - PV Sideway vent on Mooney Pilot no pic because of lattice in fence. Goes to Reg Station 395 in town between 2 houses, Avista calls C ST N of City limits <p>COLTON</p> <ul style="list-style-type: none"> • 5 YEAR SURVEY COMPLETED 2008 • 801 Depot City Shop, Police Station at Fire Station next door think 803 meter 63017 but wrap is dinged – during inspection ok • St Gall Catholic Church meter 57101 pe service no wrap at interface see what O&M says – during inspection ok <p>ALBION</p> <ul style="list-style-type: none"> • Reviewed Reg Station 302, wrap getting loose At interface. Same location wrap cracked, was snow couldn't see interface well • CP BOND curly Q bond over flanges is cp <p>Clarkston Done by Engineering and reviewed annually. Reviewed Relief capacity review fir ¾ Fisher 621, Equit meter 041 , Fisher 627 R</p>				x			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
30		<ul style="list-style-type: none"> • ST JOHN - Whitman County Rd Dept Dist 1B bldg to right wrap –top flap is coming undone water can get in – S 7 Main street mtr 51820 - new 2009 5/21/2009 report says ok • At ST John Grange Supply Agronomy meter 418817 has above ground stub, where in manual does it say ok for leak survey and 102'E Front 2009 new atmos corr. says ok Bldg left of County bldg meter 84724 no wrap on pipe, valve sies on ground. See service on map 2009 new atmos corr says S 5 Main Storage shed says needs paint does not mention the valve • Heads up – use my pen to lightly feel for screen in reg vent. A hornet nest fell out Main and Front alley S between Main and Park meter 154790 • Same alley between Main and Park south of Front next to site above meter 253398, wrap off a little patch, p/s -8.25 pic 2009 new atmos 20 E Front, in 2009 atmos corr report says ok • Same alley next door meter 84728 bad wrap, pic and -7.55, 2009 Atmos corr report may be 84723??? New atmos corr report says 18 E Front says ok steel service • Next door meter 104719 no wrap or manf wrap, reg vented 4' up wall with orange conduit, meter sits on dirt, p/s -8.06, steel ok and had epoxy • Other side of Front St bet Main and Park mtr 300068 vent this was taken care of before the inspection started • Steel stub is it on atmos corrosion survey, no wrap at interface and appears to be bare pipe corrected prior to inspection • Meter 103639 • See map for Willow St Reg Station #373 Where does HP line go from there? Are there other reg stations? <p>PULLMAN 55NW Terre View is Fire dept.</p> <ul style="list-style-type: none"> • City gate #350, 2594 S Grand Ave, in bldg, wrap dinged a bit. There is a pig launcher and it has removable supports Trevor has never found real corrosion • Hwy 27 at Wheaton Carlson's Plumbing • Reviewed to field #309, Flansburg Hwy 27, w casing, bad wrap, corrected prior to inspection • Reviewed to field Hwy 27, Leister #305, Yellow pipe, sideway vent –see pilot pv • Pics of Wheat Ridge Condos at Merman and R near Ski View. Manf wrap • Next to 1225 Grand looks like Taco time, side way vent, This is another commercial that was not on list to review per order 	x			
		<p>CONT PALOUSE</p> <ul style="list-style-type: none"> • Reviewed and field Palouse Staion #340, 3 sideway vents • Calvary Chapel Church the Palouse, 215 E Church St, meter 52964, HOS, chipped coating on riser, no wrap out of ground 2009 atmos corr IT is on the isolated service list and was inspected in 2002 , pe service 2009 report says ok 	x			
31	192.709	<p>Valve Maintenance – Transmission (1 per yr/15 months) .745</p> <ul style="list-style-type: none"> • See Q30 Endicott just above about possible valve in vault or is it EOP valve. No valve in vault, only odorizer • Check to see that Reg station valve in St JOHN at Willow St REg Station #373 is on EOP list - ok 	x			
32	192.709	<p>Valve Maintenance – Distribution (1 per yr/15 months) .747</p> <ol style="list-style-type: none"> 1. Reviewed records 2. Reviewed EOP list – include Endicott gate valve dist 3. Reviewed what maintenance was done as a result 	x			

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33	<p>Service valve maintenance (1 per yr/15 months) O&M Section 2.14 page 2 of 5 states "Each service line valve must have a shut off valve in a readily accessible location that if feasible is outside the building".</p> <p>1410 NE Stadium Way valve serviced , installed 1976, no curb valve because of age</p> <p>O&M 2.14 480-93-100 for HOS valves is not mentioned. SEE FORM PAGE ABOUT 24. Refers to spec 5.13 doesn't mention HOS valves serviced annually. Where is that in the manual? See documentation! Avista O&M written for crews as it should be. I needed to be shown where this information is – could not find otherwise.</p>	x			
34	<p>Cont 1. Lacrosse</p> <ul style="list-style-type: none"> Valve on meter less riser partially buried. In alley between RR and main beside 2nd st. valve can be operated 109 Amy, cross St is A. appears that meter dug out. Did not go up to house since it is a residence. Grocery Store, 201 Main, 1st building in alley 2nd and Main (also see atmos corr) 	x			
35	<p>480-93-100(3)</p> <p>Endicott</p> <ul style="list-style-type: none"> 5th bldg from 3rd and D meter 97520, meter sitting on dirt, could not turn valve without digging a bit, 2009 NEW ATMOS SAYS DONE 320 D ST REPORT SAYS OK <p>PALOUSE</p> <ul style="list-style-type: none"> Meters 159598, 252924 and 179513 has riser valve sitting on dirt, would be hard to turn off bust still operable, p/s -1.44 Avista said 124 E main 2009 new atmos report says ok Meter 234248 and 2nd meter (couldn't read meter# because was to dirty), wrap only 1" above ground and appeared to have bare pipe, p/s -1.389 2009 new atmos sasys ok 5/27/2009 service riser valve totally buried, impossible to turn off, meter 169472 at 230 Mill St., p/s -1.35 2009 atmos report says buried so this was identified and is ok Meter at 120 Mill St meter #252964, This sis an isolated riser and inspected was 1-5-05 ok <p>COLFAX</p> <ul style="list-style-type: none"> Sumner and Third Maint Bldg for School MMP 10 bottom of valve buried. Is operable <p>PULLMAN</p> <ul style="list-style-type: none"> Valve was buried, someone unburied, SEE PIC bottom of valve still buried, is operational. Has manufacture wrap 	x			

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36	192.709	Vault maintenance (≥ 200 cubic feet)(1 per yr/15 months) .749 (a) Each vault housing pressure regulating and pressure limiting equipment, and having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more, must be inspected at intervals not exceeding 15 months, but at least once each calendar year, to determine that it is in good physical condition and adequately ventilated. (b) If gas is found in the vault, the equipment in the vault must be inspected for leaks, and any leaks found must be repaired. (c) The ventilating equipment must also be inspected to determine that it is functioning properly. (d) Each vault cover must be inspected to assure that it does not present a hazard to public safety. <ul style="list-style-type: none"> • Any vaults over 200 cubic feet? NO, at Endicott is less than 200 feet • Endicott at Williams Gate, Gate 396 in corrugated round metal inside fenced area appears to be vault with valve. What size, does it meet criteria, review doc Pic - At the Williams gate in Endicott. All I could see from outside the fence was about an 8 foot round corrugated tank coming out of the ground with a lid. The corrugated portion was about a foot to 18 inches above the ground. During the inspection I was told it has an odorizer in it. Ok not 200 ft 	x			
37	192.603(b)	Welding – Procedure 192.225(b)	x			
38	192.603(b)	Welding – Welder Qualification 192.227/.229	x			
39	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) 1.	x			
40	192.709	NDT Records (pipeline life) .243(f)	x			
41	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	x			

Comments:

O&M section mobile homes procedure for Lacross and Clarkston, Section 2.22 page 6 of 16 is only place where mobile homes talked about in the manual.

The sites were look at during pre field

- 195 & Bishop Blvd is Safeway, Rite Aid, McDs
- Out of town HWY 27 at Wheaton, where Auto Truck Repair (9cars) and Carlson's Plumbing (8cars)meter 109212, McGregor meter79443, Ace Elliott Land General Contractors has gas is business district.
- ALL college bldgs are HOS, how many have valves????
- Buss Dist both sides of Stadium Way on Mitch?? End
- St James Episcopal Church, E 1410 Stadium Day, church and Head start day care and is part of buss dist

Q22 HIGH Pressure Patrols- everything 60 psig. Does not include bridge patrols

Reviewed 2007 WA HP Survey for Aerial and for foot/vehicle surveys and - THIS INCLUDES MARKERS, does not document when markers are replaced Talks to individuals in RW but documented. Always marks no on form because when he leaves it is taken care of.

1. Colfax HP Feeder
2. St John HP Feeder
3. Endicott HP Feeder
4. Lacrosse HP feeder
5. Pullman HP Feeder – old 8"
6. Rosalia HP Feeder
7. Palouse/Albion HP Feeder
8. Pullman HP Feeder – New WSU Boiler

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<p>9. Pullman HP Feeder – end of line on SR 270 10. Colton HP Feeder</p> <p>Reviewed 2008 WA HP Survey for Aerial and for foot/vehicle surveys and . Colfax HP Feeder 2. St John HP Feeder 3. Endicott HP FEEDer 4. Lacross HP feeder 5. Pullman HP Feeder – old 8” 6. Rosalia HP Feeder 7. Palouse/Albion HP Feeder 8. Pullman HP Feeder – New WSU Boiler 9. Pullman HP Feeder – end of line on SR 270 10. Colton HP Feeder</p>
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CORROSION CONTROL RECORDS			S	U	N/A	N/C
42.	192.453	CP procedures (design, installation, operation, and maintenance) carried out by qualified personnel NACE Cert have copy	x			
43.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	x			
44.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) Yes per standards	x			
45.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) Test stations annual reads documented on Annual Survey Reviewed for 3 years for 2006, 2007 and 2008 when they have a low read one found at Rosalia REg station #360 and follow work path with Cathodic protection work order in this case 1260. FIND they have one shorted casing they do 2xs a year Reviewed for Rosalia has rectifier. Lacrosse has rectifier and on south end of town a galvanic system, St John . Colfax, Colton, UnionTown, Pullman., Albion & Palouse and 12 miles of HP on same survey and same rectifier. This included all 55 casings in Pullman District	x			
46.	192.491	Maps or Records .491(a) One galvanic system, that is in Colton. Reviewed Colton 305 Annuals 2009 Recorded on map same way HAVE DOC	x			
47.	192.491	Examination of Buried Pipe when exposed .459 AND 480-93-110 (6) Each gas pipeline company must record the condition of all underground metallic facilities each time the facilities are exposed. Reviewed Exposed Steel piping CP Field Report WA/ID. On 9-12-08 report at 1715 SW view Dr Pullman found light corrosion on main and water under plastic wrap read was 0.868. CP PEOPLE UNABLE TO DO ANYTHING - THIS IS NOT INCLUDED IN THE LEAK AUDIT During the inspection Avista stated, on an Avista job the exposed pipe report is cross referenced but Avista cannot find a job from an exposed pipe report (not cross referenced anyway). The request will show if this is true or not – They found it	x			
48.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	x			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
49.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) Following for 100 foot sections Pullman has 0 Rosalia has 0, Lacrosse has 0, St John has 0, Endicott 0, Colfax has 0, Colton has 0 Uniontown 0, Albion has 0, Palouse 0 10% list – Avista unprotected means physically separate from system. Protected with anode or isolated riser from pe tracer and these double check of cp • Done in every District the way that fits there system best All reads are archived and saved but office doesn't know where -Spokane has Total number of isolated services, Albion 14, Palouse 16, Colfax 77, Colton 4, Endicott 6 LaCrosse 6, Pullman 186, Rosalia 10, St John 16, Uniontown 4 No low reads found in the area	x			
50.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Called by Monthly Report for 2007 Albion Palouse, colfax 2 rectifiers. Endicott, Lacrosse, Pullman has 3 rectifiers and Rosalia 1 and St John and Uniontown. Coton does not have rectifier it is galvanic. Good System has p/s check near rectifier.	x			
51.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) No critical bond in the Palouse	x			
52.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) No critical bond in the Palouse	x			
53.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) Reviewed Cathodic Protection Work Order no matter how it is found (where it is found I noted on form under source of order) . Notes remediation	x			
54.	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. Reviewed 2007 and 2008 calibration sheet from half cell and volt meter for all voltmeter holders. Calibration is done at safety meeting using a Tinker Razor voltage tester. Cathodic Protection people check your own. Bob Larson maintains list of all cp calibration for Avista.	x			
55.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) NO unprotected pipe	x			
56.	192.491	Electrical Isolation (Including Casings) .467 None	x			

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57.	<p>480-93-110(5)</p> <p>Casings inspected/tested annually not to exceed fifteen months 48-0-93-110 <i>(3) Cathodic protection equipment and instrumentation must be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. SAME AS ABOVE. When there are no manufacturer's recommendations, then instruments must be tested for accuracy at an appropriate schedule determined by the gas pipeline company.</i> <i>(4) Each gas pipeline company's procedures manual must have written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. Examples of such procedures include, but are not limited to, how to determine IR drop (as defined in 49 CFR § 192 Appendix D), how to conduct electrical surveys, how to test casings for electrical isolation, how to test casings for shorted conditions, and how to measure and interpret 49 CFR § 192 Appendix D criteria.</i> Only one casing without test leads, all others in Pullman district have been dug up and have leads installed.</p> <p><i>(5) Each gas pipeline company must conduct inspections or tests for electrical isolation between metallic pipeline casings and metallic pipelines at least once annually, but not to exceed fifteen months between inspections or tests. The test or inspection must also determine whether the pipeline has adequate levels of cathodic protection at the casing to pipeline interface. These requirements do not apply to unprotected copper inserted in ferrous pipe.</i></p> <p>1. Colton <ul style="list-style-type: none"> • OK -On HWY 27 just before Colton going S is casing </p> <p>2. Endicott <ul style="list-style-type: none"> • Ok -On E 26 in Colfax) is Avista casing? I was driving and couldn't stop. </p> <p>3 Pullman <ul style="list-style-type: none"> • Hwy #309, Hwy 27, w casing, bad wrap, p/s -.470 - Found problem. As a result of inspection this has been redone and is pe downstream and cip is 1.713. reported 4-39-09 and 6-2-09 repaired. • Casing vent n Grand (Hwy 27) by Brian Body Shop </p> <p>Palouse <ul style="list-style-type: none"> • OK Casing vent just past Palouse Reg Station #340 </p> <p>Colfax <ul style="list-style-type: none"> • OK Casing at RR tracks and test station @ third on Sumner </p> <p>Lacrosse <ul style="list-style-type: none"> • Ok Casing vents at RR crossing between Leslie and Main St kiddy corner from B&K Machinery </p>	x			
58.	<p>480-93-110(5)(a)</p> <p>Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods Only one left in Pullman district</p>	x			
59.	<p>480-93-110(5)(b)</p> <p>Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days One shorted casing, found this year. Reviewed Bi Annual Unprotected Pipe and Shorted casing Leak Survey 2009. At Spring and half blk east of Main found 4/20/09. Shorted if 100 milli volt difference. This is all electronic now. When found by cp tech goes to the atmos corr guy and he schedules to be leak surveyed twice annually. Has had 1 6 month survey so far</p>	x			
60.	<p>480-93-110(5)(c)</p> <p>Casing shorts cleared when practical</p>	x			
61.	<p>480-93-110(5)(d)</p> <p>Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months</p>	x			
62.	<p>192.491</p> <p>Interference Currents .473 None in District</p>	x			
63.	<p>192.491</p> <p>Internal Corrosion; Corrosive Gas Investigation .475(a)</p>	x			

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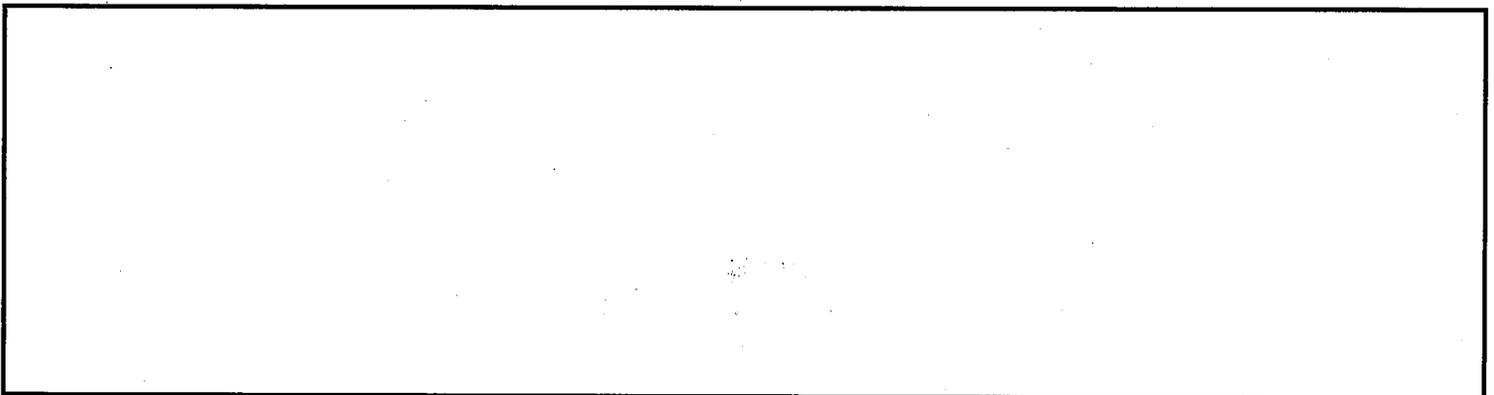
CORROSION CONTROL RECORDS			S	U	N/A	N/C
64.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	x			
65.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477	x			
66.		<p>Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481</p> <p>PV 2. <u>WAC 480-93-110 (9) Corrosion</u> <i>Each gas pipeline company must have a written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action.</i></p> <p><u>Charge:</u> Avista's written Atmospheric Corrosion Control Monitoring Program does not contain a key element.</p> <p><u>Finding</u> Avista's Atmospheric Corrosion monitoring program does not include detailed procedures for "can't gain access" situations.</p> <p>PV 3. <u>Atmospheric Corrosion CFR 192.481</u> <i>(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: If the pipeline is located: Then the frequency of inspection is: Onshore At least once every 3 calendar years, but with intervals not exceeding 39 months Offshore At least once each calendar year, but with intervals not exceeding 15 months (b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water. (c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by Sec. 192.479.</i></p> <p><u>Charge:</u> Avista did not inspect all above ground pipe in accordance with this section.</p> <p><u>Finding a</u> In the 2009 Atmospheric corrosion inspection, meter less risers were not inspected for atmospheric corrosion. Following are several locations</p> <ol style="list-style-type: none"> 1. In Uniontown (Pullman District) at the Mobile Home Park on Washington between Church and Woodworth the following meter less risers were not inspected during the 2009 inspection <ol style="list-style-type: none"> a. Space 21 b. Space 2 c. Space 19 d. Space 2 e. Space 18 f. Sp[ace 3 g. Space 17 h. Space 16 i. Space 4 j. Space 14 2. In Lacrosse (Pullman District) at 114 Leslie 		x		

**Utilities and Transportation Commission
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CORROSION CONTROL RECORDS			S	U	N/A	N/C
67.		<p>Charge: Avista did not conduct adequate atmospheric corrosion inspections.</p> <p>Finding b 1. CFR 192.481 requires <i>Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere.</i> During the 2009 Atmospheric Corrosion inspection Avista did inspect the following locations and noted them as satisfactory. However, the locations had inadequate coating. This also is an indication that adequate air to soil interface inspections were not conducted.</p> <ol style="list-style-type: none"> 1. In Clarkston at the Vagabond Village Mobile Home Park, 1505 Elm St, Space 24 meter 38832 and Space 21 meter 195042 2. In Pullman, at Brian's Body Shop on Hwy 2 <p>AOC 3. WAC 480-93-110 (9) Corrosion <i>Each gas pipeline company must have a written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action.</i></p> <p>Finding Avista's Atmospheric Corrosion monitoring program does not include or the intent is not obvious on all elements of the plan. Examples are</p> <ol style="list-style-type: none"> 1. The remediation timeframe is not clear. Avista should include a reference to the corrosion remediation timeframe section. 2. The actual atmospheric corrosion record location is in Spokane, not the individual districts. Avista plans on updating this. 				
68.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/485	x			



PIPELINE INSPECTION (Field)			S	U	N/A	N/C
69.	192.161	Supports and anchors	x			
70.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? Did not see welding being performed			x	
71.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables Did not see welding being performed			x	
72.	480-93-080(2)(a)	Plastic procedures located on site where fusing is performed?	x			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
73	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			
74	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?	x			
75	480-93-015(1)	Odorization Reviewed all odor maint records. Pullman has 1 injection and all reast are bypass and in Clarkston none, rest are in ID	x			
76	480-93-018(5)	Updated records, inc maps and drawings made available to appropriate operations personnel? 1. O&M procedures in truck. Observed during field OQ 2. original maps are computer based and available in the office or copies are made before they leave the office.	x			
77	192.179	Valve Protection from Tampering or Damage	x			
78	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	x			
79	192.463	Levels of cathodic protection	x			
80	192.465	Rectifiers	x			
81	192.467	CP - Electrical Isolation	x			
82	192.479	Pipeline Components exposed to the atmosphere	x			
83	192.481	Atmospheric Corrosion: monitoring New 2009 Atmospheric corrosion program has problems	x			
84	192.491	Test Stations – Sufficient Number .469	x			
85	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
86	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	x			
87	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	x			
88	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	x			
89	192.605	Knowledge of Operating Personnel	x			
90	480-93-124	Pipeline markers installed	x			
91	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? Yes but not documented	x			
92	192.707	Warning Signs	x			
93	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	x			
94	192.195	Overpressure protection designed and installed where required?	x			
95	192.739	Pressure Limiting and Regulating Devices (Mechanical)	x			
96	192.743	Pressure Limiting and Regulating Devices (Capacities)	x			
97	192.355	Customer meters and regulators. Protection from damage In St John a vent extend up wall made out of conduit Avista removed and stated was not in accordance with the O&M. ONLY MENTIONED IN MINI EXIT MEETING Sideway vents pj list here NOTE 192.355(b)(1) for sideway vent on customer meter and 192.195(b)(2)accidental over pressuring for sideway vents on regulators. Avista is under order to have vent extenders on all sideway vents. They developed program and only did industrial and large customer. Because of this inspection they realized they had residential and small commercial sideway vents also ARE developing a plan to inspect them before the July 1,2010 deadline. Colfax	x			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		<ul style="list-style-type: none"> Just FYI to Avista Hospital meter has 2 barricades but hospital has dumpster in between them and if were tipped over would take out meter. During inspection gave Avista a heads up. School Maint Bldg, across Sumner and Third, MMP sideway vent and riser buried to valve – corrected prior to fielding with company Pullman PV Side way vent at mtr 58463 on Generator Bldg by Vet teaching hospital. Note bldg also has propane. 818 Vet Teaching WSU 1002 and 1003 NW NYE, mtrs 68564, 178815, 178810, 178805 manifold in bldg wall alcove, vents in alcove . OK but reg toward the back 				
98	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. NO VAULTS UNDER 200 FEET	x			
99	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	x			
10	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	x			
10	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			
10	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			
10	480-93-178(6)	Are there Temporary above ground PE pipe installations currently?				
10	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?	x			
10	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?	x			
10	192.745	Valve Maintenance (Transmission)	x			
10	192.747	Valve Maintenance (Distribution)	x			

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Comments:

2/24 conducted a crew inspection at the Lacrosse Gate Station. The crew was eliminating a small wick odorizer .

- **OQ OK – current pe and welding cards**
 - Trevor Salonen, Pressure Control Man did not have current welding card. His welding card expired 1-1-09. His pe card expired 2-19-09 AVISTA TO FAX CURRENT CARDS TO OFFICE. This FYI and pv goes away when I receive copy of card. RECEIVED COPY OF CURRENT CARDS Avista manual (welding) Section 3.22 page 4 of 15 and pe Section 3.13 page 1 of 7, both say employees must have current card when performing.
 - Don Galloway, Gas Journeyman did not have a current pe card, his expired 1-8-09. He did have a current welding card which expires 6-15-09.
 - Mark Allen Gas Journeyman had current cards pe expires 1-23-10, and welding 6-09-09. He had been to OQ training week before so I did not review his OQ sheet. (He was waiting for a print out and did not have it with him)
- **OQ Tasks OK**
 - Trevor Salonen had OQ list with him. I reviewed it. He was not current in 24 tasks. He is scheduled for OQ training next week. Expired task are - Avista O&M gives them until the end of the year task expires in, This is based on the computation of time definition of annually.
 1. CP-Coating Maintenance for buried Pipe expired 2-6-07
 2. CP-Atmospheric Coating Main expires 2-4-09
 3. CP-Install Cathodic Test Leads expires 2-6-09
 4. CP-Monitor Atmospheric Corrosion expires 2-6-09
 5. Monitor corrosion on buried pipe expires 2-6-09
 6. CP-pipe to soil expires 2-6-09
 7. CO-Tracer wire connections expires 2-5-09
 8. Inspection Compliance Standards expires 2-8-09
 9. Install and Maintain Regulators expires 2-7-09
 10. Install Gas Meter expired 2-6-09
 11. Install Gas Pipelines expired 2-7-09
 12. PE pipe joining Electro fusion expired 2-18-09
 13. PE pipe joining manual butt expired 2-18-09
 14. PE pipe joining mechanical couplings expired 2-18-09
 15. PE pipe joining Mechanical service tees expired 2-19-09
 16. Pipeline backfilling expired 2-8-09
 17. Pipeline Clearance expires 2-8-09
 18. Pipeline cover expires 2-8-09
 19. Purging Gas expires 2-8-09
 20. Regulator station 5/10 year Maintenance expired 10-27-08
 21. Replace gas service lines expired 1-25-08
 22. SCBA certification expired 2-20-09
 23. SCBA refresher expired 2-20-09
 24. Visual Inspection of Welds expired 2-6-09
- **OQ Tasks – SAME as TREVOR have until end of year of expiration to requalify**
- **Don Galloway Gas Journeyman had his OQ tasks with him. He was not current in 21 tasks. He is scheduled for OQ training in March. Expired task are**
 1. CP-Coating Maintenance for buried lines expired 1-30-09
 2. CP-Atmospheric coating maintenance expires 1-7-09
 3. CP-Install cathodic test leads expired 1-30-09
 4. CP-Monitor Atmospheric corrosion expires 1-30-09
 5. CP-Monitor corrosion on buried Pipe expires 1-30-09
 6. CP-pipe to soil expired 1-30-09
 7. Cp-tracer wire expires 1-29-09
 8. Inspection compliance and standard expired 2-1-09
 9. Install and maintain regulators expired 1-31-09
 10. Install meter expired 1-30-09
 11. Install gas pipelines expired 2-1-09
 12. PE joining Electro fusion expired 1-7-09
 13. PE joining hydro butt fusion expired 1-7-09
 14. PE joining Manual butt fusion expired 1-7-09
 15. PE joining Mechanical couplings expired 1-7-09

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Comments:

16. PE joining Joint mechanical service tees expired 1-7-09
17. Purging gas pipelines expired 2-1-09
18. Replace gas service lines 1-12-08
19. SCBA certification expired 1-9-09
20. SCBA refresher expired 1-9-09
21. Visual inspection of welds expired 1-30-09

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Pipeline Safety Advisory Bulletins: Has responded to if it effects them for all

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

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	10 .605(b)	COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
10		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			x	
11		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			x	
11		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			x	
11		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			x	
11		(b) Tank must be protected according to NFPA #30			x	
11		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			x	
11		• 50% of the upright side areas are permanently open, or			x	
11		• It is an unattended field compressor station of 1000 hp or less			x	

Comments:

		COMPRESSOR STATION O&M RECORDS	S	U	N/A	N/C
117.	.709	.731(a) Compressor Station Relief Devices (1 per yr/15 months)			x	
118.		.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)			x	
119.		.736(c) Compressor Stations – Detection and Alarms (Performance Test)			x	

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Comments:

COMPRESSOR STATIONS INSPECTION (Field)				S	U	N/A	N/C	
(Note: Facilities may be "Grandfathered")								
120.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			x		
121.			Door latch must open from inside without a key			x		
122.			Doors must swing outward			x		
123.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			x		
124.			Each gate located within 200 ft of any compressor plant building must open outward			x		
125.			When occupied, the door must be opened from the inside without a key			x		
126.		(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			x		
127.	.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			x		
128.		(b)	Do the liquid separators have a manual means of removing liquids?			x		
129.			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		
130.	.167	(a)	ESD system must:					
131.			- Discharge blowdown gas to a safe location			x		
132.			- Block and blow down the gas in the station			x		
133.			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x		
134.			- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			x		
135.			ESD system must be operable from at least two locations, each of which is:					
136.		(b)	- Outside the gas area of the station			x		
137.			- Not more than 500 feet from the limits of the station			x		
138.			- ESD switches near emergency exits?			x		
139.			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		
140.			(c)	Are ESDs on platforms designed to actuate automatically by...				
141.				- For unattended compressor stations, when:				
142.				▪ The gas pressure equals MAOP plus 15%?			x	
143.				▪ An uncontrolled fire occurs on the platform?			x	
144.			- For compressor station in a building, when					
145.			▪ An uncontrolled fire occurs in the building?			x		
146.	▪ 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				
147.	.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)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
148.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			x	
149.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			x	
150.	(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	
151.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			x	
152.	.173	Is each compressor station building adequately ventilated?			x	
153.	.457	Is all buried piping cathodically protected?			x	
154.	.481	Atmospheric corrosion of aboveground facilities			x	
155.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			x	
156.		Are facility maps current/up-to-date?			x	
157.	.615	Emergency Plan for the station on site?			x	
158.	.619	Review pressure recording charts and/or SCADA			x	
159.	.707	Markers			x	
160.	.731	Overpressure protection – relief's or shutdowns			x	
161.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			x	
162.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			x	
163.	.736	Gas detection – location			x	

Comments:
No Compressor Station in Pullman District