

**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-090002		
Inspector Name & Submit Date	Stephanie Zuehlke – 10/30/2009		
Sr. Eng Name & Review/Date	David Lykken – 11/2/09		
Operator Information			
Name of Operator:	Cascade Natural Gas	OP ID #:	31522
Name of Unit(s):	Whatcom County		
Records Location:	Bellingham office 1910 Racine St., 98228		
Date(s) of Last (unit) Inspection:	November 5-8, 2007	Inspection Date(s):	September 21-25, 2009

Inspection Summary:

CNG Natural Gas Transmission and Distribution for Whatcom County – Std. incl. PA.

Informal exit 09.25.09 with Rick Kelln.
Formal exit 10.30.09.

HQ Address: Washington Corporate Facility Address: Cascade Natural Gas 222 Fairview Ave N Seattle, WA 98109	System/Unit Name & Address: Bellingham District – Whatcom County Cascade Natural Gas 1910 Racine St. Bellingham, WA 98229	
Co. Official: Eldon N. Book Phone No.: 208.377.6088 Fax No.: 208.377.6097 Emergency Phone No.: 888.522.1130	Phone No.: Fax No.: Emergency Phone No.:	
Persons Interviewed	Title	Phone No.
Rick Kelln	GM – District Operations	3607335986
Keith Meissner	Regulatory Compliance Mgr	2063816734

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

(check one below and enter appropriate date)

<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	01.22 - 25.09

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GAS SYSTEM OPERATIONS			
Gas Supplier		Williams and West Coast Energy	
Services: Residential 40,483 Commercial 4975 Industrial 219 Other 45K Total			
Number of reportable safety related conditions last year 0		Number of deferred leaks in system 4	
Number of <u>non-reportable</u> safety related conditions last year 0		Number of third party hits last year Calendar Year=57	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) Total = 44Miles Class 3&4 = 0 miles		Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) Total Miles in Whatcom Co = 1500 Miles Dist. Designed to Class 4	
Operating Pressure(s):		MAOP (Within last year) Design pressure	Actual Operating Pressure (At time of Inspection)
Feeder:	16" North Whatcom Transmission Line 10-143,907' 8" Kickerville Transmission Line 11-17,266' 12" Grandview Road Transmission Line 13-7636' 4" West Lynden Transmission Line 16-1315' 20" Ferndale Transmission Line 18-27,904 20" Sumas Transmission Line 19-17,121 8" South Kickerville Transmission Line 20-7108'	600 600 600 600 600 800 600	527 – R116 Outlet 515 – R26 Inlet 522 – R137 Inlet 494 – R82 Inlet 527 – Tap Line 10 613 – R116 Inlet 510 – R26 Outlet
Town:	Acme Bellingham – 4 distr. systems pressures Blaine Deming Everson – 2 distr. systems pressures Ferndale Lawrence Lynden Nooksack Sumas	60 60 58 34 27 60 60 60 44 58 60 60 60 40	23 55 55 31 14 57 29 26 41 55 36 57 41 32
Other:	Distribution Lines see above towns (multiple stations) – Ranges	60psig – 27psig	14psig – 57psig
Does the operator have any transmission pipelines?		Yes see above.	
Compressor stations? Use Attachment 1.		None in Whatcom County	

Pipe Specifications:			
Year Installed (Range)	Pre-1955-2009	Pipe Diameters (Range)	5/8"-20"
Material Type	Steel PE	Line Pipe Specification Used	API 5L & ASTM 2513
Mileage	1544 Total	SMYS %	40% Class 2 location - 20" Sumas Transmission line 19 and Operating at its MAOP. - 780psi (Further detailed actual operating press reported at time of inspection = 613psig for Sumas.)

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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** September 23, 2009

Integrity Management Field Validation

Important: Per PHMSA, IMP Field Verification Form (Rev 3, March 09) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <http://primis.phmsa.dot.gov/gasimp/home.gim> **Date Completed: Exclude this section per Dave 09.10.09.**

REPORTING RECORDS

			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates. None	x			
2.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802)None	x			
3.	191.15	Written reports; supplemental reports to PHMSA (Form F7100.2)	x			
4.	191.23	Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery None	x			
5.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports None	x			
6.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
7.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None	x			
8.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; None	x			
9.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; one evac August 29, 2008	x			
10.	480-93-200(1)(d)	The unintentional ignition of gas; None	x			
11.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; None	x			
12.	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; single Spike in Oct 26 ide'd on the oct 30.	x			
13.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; None	x			
14.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
15.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; None	x			
16.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; None	x			
17.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or None	x			
18.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP one spike in Oct 26, 2006	x			
19.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
20.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; None	x			

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REPORTING RECORDS			S	U	N/A	N/C
21.	480-93-200(4)(b)	The extent of injuries and damage;	x			
22.	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			
23.	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			
24.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
25.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	x			
26.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	x			
27.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			
28.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	x			
29.	480-93-200(4)(j)	Line type;	x			
30.	480-93-200(4)(k)	City and county of incident; and	x			
31.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	x			
32.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	x			
33.	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			
34.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
35.	480-93-200(7)(a) PV	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 Filed prior to deadline Document rec'd by UTC after deadline - March 16, 2009. Report sent to PHMSA does not match data provided to commission under (c)		x		
36.	480-93-200(7)(b) PV	Damage Prevention Statistics Report including the following; Document rec'd by UTC after deadline - March 16, 2009		x		
37.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; 2008 = 8831	x			
38.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and 57 in Whatcom County	x			
39.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; 4 inaccurate in 2008 (B) Failure to use reasonable care; 27 in 2008 (C) Excavated prior to a locate being conducted; or 0 in 2008 (D) Excavator failed to call for a locate. 26 in 2008	x			
40.	480-93-200(7)(c) PV	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. Review office copy. Review of Office copy identifies that this document was rec'd by UTC after deadline – April 13, 2009.		x		
41.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	x			
42.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
43.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	x			

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Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
44.	192.16	Customer notification - Customers notified, within 90 days, of their responsibility for those service lines not maintained by the operator Mandatory installation of EFV w/notification from central office	x			
45.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? CNG CP # 647 and purchasing/ordering meet these requirements	x			
46.	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? Mandatory	x			
47.	192.383	If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate? Same corporate message all districts.	x			

CONSTRUCTION RECORDS			S	U	N/A	N/C
48.	480-93-013	OQ records for personnel performing New Construction covered tasks Original documentation incl. tests stored centrally/corp. District reference Energy World Dbase for detail.	x			
49.	192.225	Test Results to Qualify Welding Procedures copies retained in central office and Yakima testing/fabrication shop as backup	x			
50.	192.227	Welder Qualification Tests records located in Mt. Vernon/ each welder has card. Rick providing most recent rotation documentation – in folder	x			
51.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) No appendix C – API 1104	x			
52.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months) completed every 6 months Keith providing most recent rotation documentation- in folder	x			
53.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period Test every 6 months	x			
54.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) no track prod. jts	x			
55.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 None	x			
56.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains No casing or conduit installed on Trans or distr. for last 3 years.	x			
57.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services install great stuff goo per co. stds. – approved goo	x			
58.	192.241(a)	Visual Weld Inspector Training/Experience tracked as a specific task – visual inspection of weld.	x			
59.	192.243(b)(2)	Nondestructive Technician Qualification (b) Nondestructive testing of welds must be performed: (2) By persons who have been trained and qualified in the established procedures and with the equipment employed in testing. None Contractors hired to complete NDT and OQ the contractors.	x			
60.	192.243(c)	NDT procedures (c) Procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c).	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
61.	192.243(f)	Total Number of Girth Welds (f) When nondestructive testing is required under §192.241(b), each operator must retain, for the life of the pipeline, a record showing by milepost, engineering station, or by geographic feature, the number of girth welds made, the number nondestructively tested, the number rejected, and the disposition of the rejects. None	x			
62.	192.243(f)	Number of Welds Inspected by NDT None within inspection timeframe	x			
63.	192.243(f)	Number of Welds Rejected None within inspection timeframe	x			
64.	192.243(f)	Disposition of each Weld Rejected None within inspection timeframe	x			
65.	192.303	Construction Specification transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part. Design standard in co. procedures for transmission.	x			
66.	192.325	Underground Clearance	x			
67.	192.327	Amount, location, cover of each size of pipe installed	x			
68.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length None	x			
69.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: None	x			
70.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; None	x			
71.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. None	x			
72.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed None	x			
73.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; None	x			
74.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. None	x			
75.	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; All has separate docket open regarding this issue – I placed procedure in file - Rick identified they do only visual inspection and do not use electronic equipment.	x			
76.	480-93-160(2)(g)	Welding specifications; and None installed >100' in length	x			
77.	480-93-160(2)(h)	Bending procedures to be followed if needed.	x			
78.	480-93-170(1)	Commission notified 2 day's prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ 20% SMYS? 37.14% on 20" Sumas Line – Actual is 40%.	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
79.	480-93-170(7)	<p>Pressure tests records at a minimum include required information listed under 480-93-170(a-h) Rick providing 2 main for @ 2007 and 2008 in PE and Stl Rick providing 2 svc for @ 2007 and 2008: in PE and Stl. (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:</p> <p>(a) Gas pipeline company's name; (b) Employee's name; (c) Test medium used; (d) Test pressure; (e) Test duration; (f) Line pipe size and length; (g) Dates and times; and (h) Test results.</p> <p>Per Rick: In main install the employee that constructed and tested is always the same person – the welder. Reviewed per above – noted that grid ID's are not updated on main & service cards However, new maps were just generated on 09.09.09. and CNG is updated grid ID's as found – services and main are located on maps via street xings/addresses. Checked several main and services per above.</p>	x			
80.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? None	x			
81.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Reviewed list of gauge check. Tested in Bellingham in meter shop – all tested 12.13.08 Deadweight & Merial #18867 twelve employees. Reviewed records of all dial gauges for employees and contract employees.	x			
82.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig Reviewed Cordata Pkwy 4" lowering of 4" wsc main. Engineering info provided in accordance with 93-175 and no deficiencies noted.	x			
83.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig None	x			

Comments:

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
84.	192.517(a)	<p>Pressure Testing (operates at or above 100 psig) – useful life of pipeline (a) Each operator shall make, and retain for the useful life of the pipeline, a record of each test performed under §§ 192.505 and 192.507. The record must contain at least the following information:</p> <p>(1) The operator's name, the name of the operator's employee responsible for making the test, and the name of any test company used. (2) Test medium used. (3) Test pressure. (4) Test duration. (5) Pressure recording charts, or other record of pressure readings. (6) Elevation variations, whenever significant for the particular test. (7) Leaks and failures noted and their disposition.</p> <p>Reviewed pressure tests for portions of the 16" North Whatcom Transmission Line #10 which is 143,907' in length. Ran in 1971 designed 08.18.71. Keith verifying existence of test records in Seattle Engineering office. In folder.</p>	x			
85.	192.517(b)	<p>Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years (b) Each operator must maintain a record of each test required by §§ 192.509, 192.511, and 192.513 for at least 5 years. Reviewed: 1452 Sunnybrook Ln., Bellingham; 2607 Erie St., Bellingham; and others. Leatherwood in Lynden; Thayer and DeBoer. Reviewed mains on Brookline; Spyglass; and others; Thornton Woods, Ferndale; Governor Rd @ Mahonia Dr., & Squalicum Lofts, Bellingham</p>	x			
86.	192.605(a)	<p>Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Completed April 2009</p>	x			
87.	192.605(b)(3)	<p>Availability of construction records, maps, operating history to operating personnel Request copy of maps in vehicles – None. Maps not carried in the field unless on leak survey. If valves need to be turned they call in and use valve identified by office/dispatch. Mt. Vernon is backup for svcmen to obtain info. Bellingham scans in construction records and forwards originals to corp office.</p>	x			
88.	480-93-018(3)	<p>Records, including maps and drawings updated within 6 months of completion of construction activity? Reviewed several services and maps – all have been updated and Bellingham is transferring/updating data to maps as they find issues. Mapping issues found during inspection are detailed under leak survey mapping area since.</p>	x			
89.	192.605(b)(8)	<p>Periodic review of personnel work – effectiveness of normal O&M procedures Request work order information for review Reviewed listing of 16 District Field inspections performed by field mgrs. Rick reviews and sends a copy to Keith for additional review. Periodic inspection review of personnel work reviewed were field manager inspection reports between January and August of 09.</p>	x			
90.	192.605(c)(4)	<p>Periodic review of personnel work – effectiveness of abnormal operation procedures How review? Keith identified he will discuss with trainers to determine how svc. men are trained in documenting and reading % leak reported on forms. Kris W. identified that all barholes are %gas to air and entry of enclosure gets 1st read in ppm (gas to air) then pinpoint location if safe of LEL on Sentry. Kris stated LEL reads finer% than gas to air%. This issue has been identified as a PV under WAC 480-93-187. Keith providing trainer documentation re: above: Reviewed damage/leak reports placed three examples in folder. No label appears on forms for % leak.</p>	x			
91.	192.609	<p>Class Location Study (If applicable) None in this district.</p>	x			

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92.	192.614	Damage Prevention (Miscellaneous) Pipeline Association of Public Awareness – is a coop group and they send a mailer on behalf of CNG. List and info reviewed and approved by CNG. The excavators are identified by SIC Code. PLAPA lists 919 excavators for WHATCOM Co. – CNG includes additional. CNG mails those that dig in special and personal mailing on digging safety when send billing. Periodically send separate mailing to those that dig in as a reminder.	x			
93.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Reviewed operator records of previous accidents and failures including third-party damage and leak response. Reviewed multiple 3 rd party damage and leak response – appears to be prompt.	x			
94.	192.615(b)(1)	Location Specific Emergency Plan One located in Bellingham GM Office with backup copies at headquarters and in Mt. Vernon. This issue has been identified under 2 2008 inspections: Tri-Cities and Aberdeen – no time for CNG to have addressed this by this inspection.	x			
95.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training Verification of effectiveness is through safety meeting discussion on an annual basis and includes emergency response through table top in this meeting. On 10.22.08 an ICS Powerpoint/District ICS Plan/Emergency Plan was presented to all Bellingham employees by GM in a 1 hour mtg. Leak investigation, deferred leak and repair documentation was discussed/presented by Sam on May 20,2009, identifying proper compliance documentation/records. This was discussed in July 16, 2009 safety meeting. Review of incident occurrences/shortcomings were discussed on 06.25.09 CNG has OQ for blowing gas. Reviewed roster of employee emergency procedure training.	x			
96.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Reviewed: leak response/3 rd party damage reports are reviewed and also a 06.25.09 incident review of occurrences/shortcomings and how to not repeat with employees.	x			
97.	192.615(c) AOC	Liaison Program with Public Officials There is a file that identifies that GM provided gas information with local official however no frequency for identification of the exchange of info and contact has been established. GM provided detailed information regarding very recent FEMA gathering with 70 local Whatcom County 1 st responders 08.18.08 – 08.22.08 Listing of FEMA attendees in folder.		x		
98.	192.616	Public Awareness Program				
99.	192.616(e&f) PV	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: Complete information has not been provided as identified below.		x		
100.		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.				
101.		API RP 1162 Baseline* Recommended Message Deliveries				

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102.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)			
		Residence Along Local Distribution System	Annual- Cycle of 6 they go out every other month. Copy of one of the cycles in folder – also in Spanish. Cycle from 02.08 through 12.08 provided.			
		LDC Customers	Twice annually - Okay			
		One-Call Centers	As required of One-Call Center They are provided with copies of new Prism maps. Keith providing documentation of the last contact.			
		Emergency Officials	Annual Keith providing			
		Public Officials	3 years Keith providing			
		Excavator and Contractors	Annual Reviewed list of excavator/contractors on file. Keith providing verification of mailing.			
		Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)			
		Residence Along Local Distribution System	2 years Keith providing documentation of mailing. How update owner changes? They identified the notify all property owners along route.			
		One-Call Centers	As required of One-Call Center			
		Emergency Officials	Annual Keith providing			
		Public Officials	3 years Same as above			
		Excavator and Contractors	Annual Same as above			
103.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation?, etc.				
104.	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. Keith ID'd English & Spanish and provided copies.				
105.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. None				
106.	192.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage (PHMSA area of emphasis) None				
107.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08) CNG procedures have not been updated to include PA-11 [S] comment in design formulae for HD / thermal for plastic pipe. Keith stated February 2008 is last update nothing beyond or after 12.24.08 - reminded Keith & Rick of this criteria.				
108.	480-93-015(1)	Odorization of Gas – Concentrations adequate Bellingham has 8 Odorizers: Sumas, Nooksack; Lawrence; Deming; Acme, and 2 in Bellingham. Reviewed records for monthly odorizer inspections for 2008 & 2009.				
109.	480-93-015(2) AOC	Monthly Odorant Sniff Testing Odorant sniff test locations were determined by GM map choice – no engineering based locations choice for sniff test. There are 48 sniff test locations with 8 odorizers.				

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
110.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements. None – CP 74 if need to reference	x			
111.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Reviewed calibration records for EC002 Odorometer for 01.12.09 and 03.24.08.	x			
112.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) Rick provided quarterly patrol records for bridge crossings/ditches reviewed 2007, 2008, & 2009. Keith identified existing long term program to change out metal supports (agreement completion is 2010) Copies of 1 years quarterly supports identify metal to meal contact over two bridge crossings. Copies in folder.	x			
113.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days ? Replaced in the field immediately or fill out a work order once reported and complete the installation quickly.	x			
114.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on Completed OQ in the field on this – okay.	x			
115.	480-93-155(1)	Up-rating of system MAOP to >60 psig ? Procedures and specifications submitted 45 days prior? None	x			
116.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186 ? Records retained? Leaks have not been assigned a grade at the scene by personnel completing the leak evaluation. Leaks have been graded by the GM. Leak investigation is a covered task: field personnel are not grading their found leaks. The practice of field staff contacting the General Manager to grade found leaks is inconsistent with this training.		x		
117.	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; Requested a listing of reported foreign leaks – Rick contacted office mgr. for info and will provide once this person is available. 3028 Lindbergh Ave. #P, Bellingham site 05.05.09 letter 06.11.09 305 N. Garden St., Bellingham – site 05.27.09 letter 06.12.09 7352 Seashell Way – site 05.19.09 letter 06.12.09 1810 1 st , Bellingham – 05.22.09 letter 06.12.09	x			
118.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? Reviewed documentation of several foreign leak issues – letters were sent in timely manner. 608 Clark Rd. Bellingham, WA – Foreign leak not followed up w/conversation or letter. Record in folder. Single incident missed w/o documentation – all others have documentation.	x			
119.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? Reviewed substructure damage/leak report forms for 2008 & 2009. No issues noted.	x			
120.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? None downgraded.	x			
121.	480-93-187 PV	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) Reviewed records for 2008 and 2009 – all info appears to have been included. No label on % reads – substructure forms in folder. Keith will discuss with trainers to determine how svcmn are trained in documenting and reading % leak reported on forms. Kris W. identified that all barholes are %gas to air and entry of enclosure gets 1 st read in ppm (gas to air) then pinpoint location if safe of LEL on Sentry. Kris stated LEL reads finer% than gas to air%. Keith providing trainer documentation re: above: Reviewed damage/leak reports placed three examples in folder. No label appears on forms for % leak. This information was included in Question #90. This information was not provided. 09.14.07 Special leak survey does not include proper info. – map does not match survey request – no equipment identified as being utilized, etc. – copy in folder. 08.23.07 special leak survey does not include proper info – no map included; no equipment identified. Also 09.25.07 special leak survey does not include map or equipment used calibrated piece of equipment.		x		

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OPERATIONS and MAINTENANCE RECORDS		S	U	N/A	N/C
122.	<p>Gas leak surveys (1) Each gas pipeline company must perform gas leak surveys using a gas detection instrument covering the following areas and circumstances:</p> <p>(a) Over all mains, services, and transmission lines including the testing of the atmosphere near other utility (gas, electric, telephone, sewer, or water) boxes or manholes, and other underground structures;</p> <p>(b) Through cracks in paving and sidewalks;</p> <p>(c) On all above ground piping (may be checked with either a gas detection instrument or with a soap solution);</p> <p>(d) Where a gas service line exists, the gas pipeline company must conduct a leak survey at the building wall at the point of entrance, using a bar hole if necessary; and</p> <p>(e) Within all buildings where gas leakage has been detected at the outside wall, at locations where escaping gas could potentially migrate into and accumulate inside the building.</p> <p>2 Transmission and 2 Distr. included in folder for review. OQ of employees: They identified above issue perfectly during OQ However, field staff identified that they do not grade leaks in the field but rather they provide site and findings information to GM and he grades the leak. Review of leak surveys indicate that this reg. has been met during their responses. GM states that he is following CP's.</p> <p>Complete the following annually: Demming, Everson, Lawrence, Lynden, Nooksack, Sumas, Acme. The following are remaining completed @ 5.yr intervals. Bellingham, Ferndale, and Blaine.</p> <p>Reviewed 2007 Section 6 Ferndale map – services are not on map – no way to determine whether all services were surveyed. Reviewed new map generated 09.2009 to see whether services have been included on these maps. Reviewed Map grid 14-Z 2009 and Z-14 2007. Services are included in 2009 but not in 2007.</p> <p>Svcmen completing Bellingham Survey right now are using newly printed maps but find that all services are not documented on map. They identified that they are surveying them but not documenting them for mapping services per their CP's.</p> <p>No map has been included with Lynden Section 1-2 Leak Survey but is located in "Long File" and was provided – okay</p> <p>Unable to determine whether Alley N. of Front St. Meter #580110 or other Aerial meters services have been surveyed to the meter. CNG does not have a procedure in place for to identify the above ground portions of aerial services have been leak surveyed. THIS SERVICE IS IN BUSINESS DISTR. and would need annual survey – CNG surveys all of Lynden annually. Example: 108 Front st., Lynden.</p> <p>Lynden map section in folder identifies that three services were not marked as being leak surveyed – in 2009 - 300 & 305 Stremler Dr. and 1729 D St., Lynden. 300 Stremler Dr. was installed in 2003 but did not appear on maps 2008 survey – copy in file.</p> <p>Does appear in 2009 survey but not marked as having been surveyed. Also not marked in 2008 or 2009 is single service going to 205 British Columbia Ave. Checking on whether have HO for this address – 10 separate 205 addresses this location. Not identified as being surveyed in 2008 map is 411 & 412 17th St., Lynden. And in 2009 411 17th St. Lynden has not been marked as having been surveyed. Also see addresses for 205 British Columbia Ave., Lynden.</p>				
	480-93-188(1) PV		x		
123.	<p>Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)</p> <p>Calibration records for FI 8446-3 on HP line leak survey #2 for 2008 & 2007 – appears okay. Also reviewed calib records for FI unit 48269 – appears okay. Great record keeping. Informaiton also listed on Surveillance records and maps.</p>		x		
	480-93-188(2)				

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
124.	480-93-188(3) AOC	Leak survey frequency (Refer to Table Below) Frequency is correct but some services missed. Records of prior year have not been reviewed for upcoming survey. CNG procedure require review of last survey completed. At time of inspection CNG stated this was not a CNG requirement.		x		
	<p>Business Districts (implement by 6/02/07) AOC Reviewed BD survey for N. State St., Bellingham. Determined that records reviewed included some areas in 2008 but not in 2009. See Adjacent notation. Zone map identifies all within business district.</p>	<p>1/yr (15 months) 725 N State St., Bellingham is within Section 1 Business District it was survey in 2008 but was not surveyed in 2009. Field staff make decisions based upon field determination as to whether qualify as BD. Section 1 BD leak survey zone map identifies that this section is within BD – question is: whether leak survey all inside zone id'd on map; audit of leak survey work completed to verify that location has been surveyed. Impression is that it is business district based upon zone map but not on smaller area maps.</p>				
	<p>High Occupancy Structures – Public bldg. insp. AOC (14) "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.)</p> <p>205, 205A, 205B, C, F2, 205D, 205E, 205F1, 205G, 205H British Columbia Ave., Lynden used to be an Elderly Housing Facility but when went out of business they removed this structure from HO listing. Now it is office bldg. but has not been replaced onto HO listing for leak surveys.</p>	<p>1/yr (15 months) CNG CP 725. HO (CNG refers to as Public Bldg.) Servicemen make the call as to whether qualifies as an HO Structure at the time of meter set. They carry copy of Definition (their CP above) on dash of service van. Reports are prepared on a monthly basis for HO surveys to be completed that month. Reviewed HO records for 2008 & 2009 completed and upcoming 2009 HO lists to be completed in upcoming months. Requested records for a HO that has 2 frequency checks. – Reviewed 2007-2009 records for 1095 Telegraph Rd., Unity Church, Bellingham - okay</p> <p>Requested records for the following: Reviewed HO for 873 Hinotes Ct #B-5, Lynden Set in 06.05.09 – one frequency check. Also reviewed 2500 Suchanon Dr., Deming. Set in 06.03.09. Also requested records for 21 Bellwether Way #101, Bellingham, 4220 Meridian st. #104, Bellingham, and 905 Squalicum Pkwy#101, Bellingham – all these turned out to be new HO that are on HO list but meters have not been set yet.</p>				
	Pipelines Operating ≥ 250 psig	<p>1/yr (15 months) Reviewed 10" Squalicum HP Line #17 for 2007 & 2008 – In folder</p>				
	Other Mains: CI, WI, copper, unprotected steel	<p>2/yr (7.5 months) None</p>				
125.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs	x			
126.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred None	x			
127.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected Additional locations completed re: potential unstable soil area completed 01.07.09 for bridge crossings. Okay	x			
128.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions Visual surveys completed after flooding 03.28.08 for multiple locations in Bellingham include required information.	x			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C												
129.	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 Surveys 104 E. Maple, Bellingham-- missing multiple items required for survey – in file. Single special leak survey with error – all others appear correct. Id'd to Rick during inspection.	x															
130.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f) (a) Description of the system and area surveyed (including maps and leak survey logs); (b) Survey results; (c) Survey method; (d) Name of the person who performed the survey; (e) Survey dates; and (f) Instrument tracking or identification number. Reviewed several cities of leak surveys – Blaine, Acme, portions of Bellingham – did not notice any issues on survey documentation.	x															
131.	480-93-188(6) PV	Leak program - Self Audits See Business District leak survey details above in #124.		x														
132.	192.709 AOC	Patrolling (Transmission Lines) (Refer to Table Below) .705 Reviewed Lake Whatcom Blvd @ Austin Creek/Sudden Valley Bridge Crossing 06.20.07 – removed pipe from bridge and directional bored the pipe. Svcman documented no markers this date. Keith stated no requirement to replace markers at this crossing. Copy in folder. This xing has been removed from their patrol list. Reviewed several patrols for 2007 and 2008 and 2009 re transmission lines. If CNG determines that this location does not pose risk at this scour point and does not need markers then they need to provide documentation that this has been reviewed accordingly and does not present a risk which would necessitate markers. GM identified markers are installed this location. Patrolling issue: Cover read on September 24, 2009, in field electronically – no digging occurred to verify. Location read was for Transmission main in ditch line of public roadway West side of Haines Lawn Care on Irongate Rd., Bellingham – read was 20" at base of ditch. Minimum Cover requirement per this section is 36". R/W and Cover should be monitored.			x													
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td align="center">1 and 2</td> <td align="center">2/yr (7½ months)</td> <td align="center">1/yr (15 months)</td> </tr> <tr> <td align="center">3</td> <td align="center">4/yr (4½ months)</td> <td align="center">2/yr (7½ months)</td> </tr> <tr> <td align="center">4</td> <td align="center">4/yr (4½ months)</td> <td align="center">4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
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133.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 Okay – Examples in folder. Under #124.	x															
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134.	192.603(b)	Patrolling Business District (4 per yr/4½ months)	x															
135.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) Quarterly patrol is all in one and reviewed above.	x															
136.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) See PV under WAC 480-93-188(1)	x															
137.	192.603(b)	Tests for Reinstating Service Lines 192.725 Reviewed 3 rd party damage reports – did not note any issues.	x															

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
138.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727(b) Each operator shall keep records necessary to administer the procedures established under §192.605. Reviewed several abandoned mains and services and checked maps for update. Okay.	x			
139.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	x			
140.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 Reviewed annual capacity review data for 2008 and reviewed with Tri-cities and Aberdeen – 2009 is scheduled for November 2009.	x			
141.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745	x			
142.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	x			
143.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) CP 604.03 Criteria for determining service valve 4" or larger > 50', 2" or large over 60psig and 50' length, 2" to the following churches schools hospital, prison elderly govt bldgs service to HO frequency structures w/occupancy > 100 (assembly building), Etc. incl. in procedures 09.06.2007. Structures on list since 2007 are: Reviewed 04.11.09 SV record for 2155Yew St. Rd., Bellingham - /sv-007; Reviewed SV-002 for 04.10.08 & 05.26.09 inspection & SV-001 601-A Front St., Bellingham for 06.10.08 & 05.20.09.	x			
144.	192.709	Vault maintenance (>200 cubic feet)(1 per yr/15 months) .749 None meet this criteria.	x			
145.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751 None issued – only through OQ tapping requirements is this discussed – again, no permits are issued	x			
146.	192. 603(b)	Welding – Procedure 192.225(b) Procedures are corporate – No changes.	x			
147.	192. 603(b)	Welding – Welder Qualification 192.227/.229 OQ documents provided & in folder. Welder Qualification records maintained in Mt. Vernon – the western CNG testing ctr. Reviewed OQ of one Combination Welder during field OQ.	x			
148.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) none qual. And none installed – these records are located at corp. office Seattle.	x			
149.	192.709	NDT Records (pipeline life) .243(f) NDT records located in Engineering in Seattle. None available in Whatcom County – located in Seattle corp office. . Each operator shall maintain the following records for transmission line for the periods specified: (a) The date, location, and description of each repair made to pipe (including pipe-to-pipe connections) must be retained for as long as the pipe remains in service. (b) The date, location, and description of each repair made to parts of the pipeline system other than pipe must be retained for at least 5 years. However, repairs generated by patrols, surveys, inspections, or tests required by subparts SubPart L and M of this part must be retained in accordance with paragraph (c) of this section. (c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer. Requested records for any repairs on transmission lines Whatcom County. 2 records provided in folder for review.	x			
150.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years) Valve see above #149 – this is the only t-main repair within the last 2 years.	x			
151.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) IMP not part of this inspection per Dave.– these records kept in Seattle.	x			

Comments:

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AOC's/Field Observations noted

1. **WAC 480-93-180(1) Plans and procedures.**
CNG does not appear to have detailed knowledge for gaining timely access to their transmission pipeline within the BP Refinery. Staff notes that CNG presently has 2 employees that complete leak survey on this line that have completed the Refinery's safety orientation.
2. **WAC 480-93-180(1) Plans and procedures.**
Records do not indicate that prior to the commencement of their present year leak survey's that CNG had reviewed the previous year's leak survey maps for inconsistencies.
3. **49 CFR §192.615 Emergency plans.**
CNG provided documentation which identified that some manner of liaison with local officials had occurred however, no frequency regarding the exchange of that information and the updating of required contact information has been established.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
152.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) Not identified in procedures and not kept in Bellingham. Per Keith: Xtru coat and Royston (green wrap) – All items provided to Bellingham from Central Stores.	x			
153.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) Within the last 3 years all CP Systems meet this requirement.	x			
154.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) No isolated sections of main requiring protection in Whatcom County. Reviewed 2007-2009 Annual Cathodic Protection Grid System Survey. When did field visit at R-22 at xing on Northwestern Rd. at vents – reads were -0.65 on N side and -0.58? on S. side. Reaks on annual CP report reads differently than those reads provided by svcman during field inspection. The July/August 2009 for R-22 Northwest Rd. is Inlet -1.302 Outlet -1.176. Also reviewed the Bi-monthly rectifier reads Jan-Feb 2009 through July/Aug 2009. All documents in annual survey books are copies. Engineering has all originals. List of pre-field reads & reads by CNG included in comments at end of report.	x			
155.	192.491	Maps or Records 491(a)	x			
156.	192.491	Examination of Buried Pipe when exposed 459	x			
157.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed 3 rd party damage substructure damage reports/ Service line construction and O&M forms.	x			
158.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) 465(a)	x			
159.	192.491	Rectifier Monitoring (6 per yr/2½ months) 465(b)	x			
160.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) 465(c) I Bond located at Kickerville/Henry Rd. NW of intersection in BP test station C18. Reviewed Jan through Aug. and completed properly. Also indicated on annual report dated 02.11.09	x			
161.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) 465(c) None.	x			
162.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) 465(d)	x			
163.	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.	x			
164.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) 465(e) None	x			
165.	192.491	Electrical Isolation (Including Casings) 467	x			
166.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months portion of casing report in folder for 2007-2009	x			
167.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	x			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
168.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days	x			
169.	480-93-110(5)(c)	Casing shorts cleared when practical	x			
170.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months	x			
171.	192.491	Interference Currents .473	x			
172.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) None	x			
173.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	x			
174.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477	x			
175.	192.491 PV	<p>Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Completed in shut down areas @ 3 yrs. Rick providing documentation on the following: BELLINGHAM</p> <ol style="list-style-type: none"> 1) 3219 Meridian 2) 2801 Meridian & W. Illinois (NW Corner) 3) Meter #572694 4) 2615 Meridian 5) Meter #616227 6) SE Corner Champion St. & Prospect (In alcove). 1313 Bay St. Marked Good - inspected 02.27.08 7) Meter #292235 1317 Commercial St. Suite 204 – Marked Good 02.27.08 8) E. of Meter #292235 1319 & 1323 Commercial St. – <u>Marked Good</u> by CH 02.27.08 9) R-18 at James St. (Chart box support sleeve over pressure carrying pipe WELD FTG.?) Sleeve removed and corrected at time of inspection – found to have A/C issues & meas. Sm. Amt of pipe loss. Appeared to be painted over but turned out that sleeve was welded but incomplete & moisture allowed into sleeve causing corrosion of pipeline. <p>BELLINGHAM TO FERNDALE</p> <ol style="list-style-type: none"> 10) Meter #631409 4165 Meridian JR Furniture USA Inc. 01.14.08 JF marked good. 11) Aldrich Rd. & Larrabee Rd. 4350 Aldrich Rd. 01.20.09 marked Good by JF. <p>FERNDALE</p> <ol style="list-style-type: none"> 12) 5744 Ferndale Providing next week. <p>LYNDEN</p> <ol style="list-style-type: none"> 13) Alley N. of Front St. Meter #580110 – 108 6th St., 07.13.09 marked good by GH. 14) Judson St. Alley S. of Front St. Meter #648163 Providing next week. 15) Judson St. Alley S. of Front St. E. of 511 Front (2 meter manifold) 509 & 509A Front St. 07.13.09 marked Good by GH for both meters 127299 & 134291 16) Meter #186095 505 Front St. marked Good by GH on 07.13.09 <p>Shut down Section 1009 (installed in approx 1957-60) no A/C records available for this section. Appears this shut down section has never been surveyed.</p>		x		
176.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	x			
177.	480-93-110(3)	CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched) Voltmeter & ½ cell records. Reviewed 2007 & 2008 Records for Voltmeter calibration and 1/2cell calibration. Exact record dates are 11.17.08 and 12.1107	x			

**Utilities and Transportation Commission
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Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
178.	192.161 PV	<p>Supports and anchors</p> <p>(a) Each pipeline and its associated equipment must have enough anchors or supports to:</p> <p>(1) Prevent undue strain on connected equipment;</p> <p>(2) Resist longitudinal forces caused by a bend or offset in the pipe; and,</p> <p>(3) Prevent or damp out excessive vibration.</p> <p>(b) Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents.</p> <p>A 4-branch 12-meter manifold made up of 2" steel appears to be entirely supported by an unsupported ¾" riser. The manifold is located on Judson St. in the alley S. of Front St., Lynden with one of the meters identified in black magic marker as 415, is not independently supported and appears to require customer piping for support of the pipe and equipment.</p> <p>Alley N. of Front St., Bellingham Meter #592972: Riser over-extended without support and riser bent to side.</p>		x		
179.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	x			
180.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	x			
181.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	x			
182.	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			
183.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?	x			
184.	480-93-015(1)	Odorization	x			
185.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	x			
186.	192.179	Valve Protection from Tampering or Damage	x			
187.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	x			
188.	192.463	Levels of cathodic protection	x			
189.	192.465	Rectifiers	x			
190.	192.467	CP - Electrical Isolation	x			
191.	192.476	Systems designed to reduce internal corrosion	x			
192.	192.479	Pipeline Components exposed to the atmosphere See monitoring under #193 below.	x			
193.	192.481	<p>Atmospheric Corrosion: monitoring</p> <p>1. SE corner Champion St. & Prospect (in alcove) steel supports not adjustable to</p>		x		

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		inspect 2. nipple tack-welded to pressure pipe – no A/C or coating monitor a. 523 Front St. Meter 585429 –Judson St. Alley S. of Front St., Lynden b. Meter 186095 – no A/C coating at/in welded pipe nipple 3. Judson St. Alley S. of Front St., Lynden 12 meter manifold on approx ¾" riser 4. R-18 at James St. – Not previously recognized as an A/C area – 0.3 pipe loss identified when support removed from chart box press. Pipe. Additional information identified in prefield details included below. (PV noted under 192.491)				
194.	192.491	Test Stations – Sufficient Number .469	x			
195.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
196.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	x			
197.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	x			
198.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	x			
199.	192.605	Knowledge of Operating Personnel	x			
200.	480-93-124	Pipeline markers	x			
201.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days ?	x			
202.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	x			
203.	192.195	Overpressure protection designed and installed where required?	x			
204.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	x			
205.	192.741	Telemetry, Recording Gauges	x			
206.	192.751	Warning Signs				
207.	192.355	Customer meters and regulators. Protection from damage Detailed in pre-field below under WAC 480-93-140	x			
208.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	x			
209.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? See pre-field below. Regulator vents were found placed in a horizontal orientation which has the potential to allow moisture to accumulate in the regulators. 1. 1411 Girard, Bellingham – CNG corrected 2. 2014 C. St., Bellingham (Municipal Court Building) – CNG corrected 3. Meter #220931, Bellingham – CNG corrected 4. SE corner Champion St. & Prospect, Bellingham (in alcove) CNG rebuild entire loop - corrected 5. Judson St. Alley S. of Front St., Meter 185109, Lynden The regulator vent for 1411 Girard, Bellingham, was found without a vent screen causing it to not be insect resistant. 10.30.09 – CNG identified above corrections.	x			
210.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) none noted during inspection	x			
211.	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. None noted during inspection	x			
212.	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 None noted during inspection	x			
213.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? None noted				

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
214.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?	x			
215.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?	x			
216.	192.745	Valve Maintenance (Transmission)	x			
217.	192.747	Valve Maintenance (Distribution)	x			
218.	480-90-328 PV	Meter Identification		x		

Comments:

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Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-07-01	April 27, 2007	Pipeline Safety: Senior Executive Signature and Certification of Integrity Management Program Performance Reports
ADB-07-02	September 6, 2007	Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-08-02	February 28, 2008	Identifying Issues with Mechanical Couplings that Could Lead to Failure
ADB-08-03	March 10, 2008	Dangers of Abnormal Snow and Ice Build-Up on Gas Distribution Systems
ADB-08-04	June 5, 2008	Pipeline Safety - Installation of Excess Flow Valves into Gas Service Lines

Comments:

PRE-FIELD: Whatcom County

NOTED INTERFACE ISSUES

1. 3219 Meridian St., Bellingham
2. 2731 Meridian & W. Illinois (SW Corner – Premier Wireless), Bellingham
3. Meter #218495 (Alley) Bellingham
4. Meter #654225 (Alley) Bellingham
5. SE Corner Champion St. & Prospect (in alcove) Bellingham
6. Meter #285394, Bellingham
7. 411 W. Holly St., Bellingham
8. Meter #631409, Bellingham to Ferndale line
9. Aldrich Rd. & Larrabee Rd., Bellingham
10. 5744 Ferndale, Ferndale (Ferndale Grain)
11. Meter #255793, Lynden (Alley N. of Front St.)
12. Meter #288723, Lynden (Alley N. of Front St.)
13. Judson St. Alley S. of Front St. Meter W. of Meter #255793, Lynden
14. Judson St. Alley S. of Front St., Lynden (Home Furnishings)
15. Judson St. Alley S. of Front St., Lynden Meter #186095

NOTED COATING /ATMOSPHERIC CORROSION ISSUES

1. 2500 Meridian, Bellingham
2. 1411 Girard, Bellingham (Kentucky Fried Chicken)
3. 901 Dupont St., Bellingham (Dupont Cleaners)
4. Meter #292235, Bellingham
5. R-18 at James St., Bellingham
6. 5744 Ferndale, Ferndale (Ferndale Grain)
7. Alley N. of Front St., Lynden W. of Meter #179841
8. Judson St. Alley S. of Front St. E. of 511 Front St., Lynden (2 meter manifold)
9. Judson St. Alley S. of Front St., Lynden (Meter 648163)
10. Judson St. Alley S. of Front St., Lynden (11-12 meter manifold)
11. Aldrich Rd. & Larrabee Rd., Bellingham to Ferndale line
12. 3219 Meridian St., Bellingham
13. 2801 Meridian & W. Illinois NW Corner (Assoc. Implant & Cosmetic Dentistry), Bellingham
14. Meter #572694, Bellingham
15. 2615 Meridian, Bellingham
16. 2710 Meridian, Bellingham
17. Meter #616227, Bellingham
18. E. of Meter #292235, Bellingham
19. Meter 631409, Bellingham to Ferndale line
20. Aldrich Rd. & Larrabee Rd., Bellingham to Ferndale
21. Judson St. Alley S. of Front St. W. of Meter #255793, Lynden
22. R-25 – Support painted over - was support moved to inspect coating/pipe – removed & corrected during inspection.
23. Champion St. & Prospect SE Corner
 - a. Under pipe support

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Comments:

24. 523 Front St., Lynden Meter #585429
 - b. Tack-welded slipper for pipe support
25. Judson St. Alley S. of Front St., Lynden Meter #186095
 - c. Tack-welded slipper for pipe support
26. Judson St. Alley S. of Front St. W. of Meter #255793, Lynden
 - d. Welded slipper for pipe support

PARTIALLY BURIED/BURIED EQUIPMENT

1. Meter #572694, Bellingham
2. Meter #'s 567104 & 281276, Bellingham (2 meter manifold)
3. Judson St. Alley S. of Front St. Meter #277375, Lynden

PARTIALLY BURIED/BURIED SERVICE VALVE

1. Meter #572694, Bellingham
2. 411 W. Holly St., Bellingham
3. Judson St. Alley S. of Front St., Lynden (Home Furnishings)
 - a. Remote number 02 28858387

PROTECTION OF VENT OPENING – Sideways Vent Orientation

1. 1411 Girard, Bellingham
 - a. No vent screen
2. 2014 C. St., Bellingham (Municipal Court Building)
3. Meter #220931, Bellingham
4. SE corner Champion St. & Prospect, Bellingham (in alcove)
5. Judson St. Alley S. of Front St., Meter 185109, Lynden

EQUIPMENT IDENTIFICATION

1. Judson St. Alley S. of Front St. E. of 511 Front St., Lynden (2 meter manifold)
 - a. No unique number on either meter
 - b. No company identification label on either meter
2. Judson St. Alley S. of Front St., Lynden
 - a. No unique number on meter with magic marker written 415
 - b. No company identification label on meter with magic marker written 415
3. Judson St. Alley S. of Front St. Meter W. of Meter #255793, Lynden
 - a. No unique number on meter
 - b. No company identification label on meter
4. Judson St. Alley S. of Front St., Lynden (Remote skew #02 28858387)
 - a. No company identification label on meter
5. Alley N. of Front St., Lynden (3 meter manifold)
 - a. No company identification label on Meter #406262

PROTECTION FROM DAMAGE

1. Alley N. of Front St., Lynden Meter #179841
 - a. Door opens onto meter
2. Alley N. of Front St. W. of Meter #179841, Lynden
 - a. Meterless riser in tree trunk
3. Meter #220931, Bellingham
 - a. Trash bin pushed onto regulator
4. Alley N. of Front St., Bellingham Meter #592972
 - a. Riser over-extended without support
 - b. Bent due to customer install of loading/storage structure
5. Judson St. Alley S. of Front St., Lynden
 - a. 11-12 meter manifold supported by ¾" riser – no independent support of equipment
6. Alley N. of Front St., Lynden Meter #467842
 - a. Potential condensate/icing issues from exhaust vent w/near zero clearance to meter casing

NO PROCEDURE

1. No procedure for completing leak survey of overhead service equipment/meter sets
2. No procedure for emergency access to Olympic Refinery without safety orientation.

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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		COMPRESSOR STATION PROCEDURES				
219.	.605(b) No compressor stations this location.		S	U	N/A	N/C
220.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			x	
221.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			x	
222.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			x	
223.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			x	
224.		(b) Tank must be protected according to NFPA #30			x	
225.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			x	
226.		• 50% of the upright side areas are permanently open, or			x	
227.		• It is an unattended field compressor station of 1000 hp or less			x	

Comments:
 No compressor stations this location.

			COMPRESSOR STATION O&M RECORDS			
228.	.709 No compressor stations this location		S	U	N/A	N/C
228.		.731(a) Compressor Station Relief Devices (1 per yr/15 months)			x	
229.		.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)			x	
230.		.736(c) Compressor Stations – Detection and Alarms (Performance Test)			x	

Comments:
 No compressor stations this location.

			COMPRESSOR STATIONS INSPECTION (Field)			
(Note: Facilities may be "Grandfathered")			S	U	N/A	N/C
231.	.163 (c) No compressor stations this location.	Main operating floor must have (at least) two (2) separate and unobstructed exits			x	
232.		Door latch must open from inside without a key			x	
233.		Doors must swing outward			x	
234.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			x	
235.		Each gate located within 200 ft of any compressor plant building must open outward			x	
236.		When occupied, the door must be opened from the inside without a key			x	
237.		(e) Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			x	
238.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors?			x	

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
239.	(b)	Do the liquid separators have a manual means of removing liquids?			x	
240.		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	
241.	.167 (a)	ESD system must:				
242.		- Discharge blowdown gas to a safe location			x	
243.		- Block and blow down the gas in the station			x	
244.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x	
245.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			x	
246.		ESD system must be operable from at least two locations, each of which is:				
247.	No compressor stations this location.	- Outside the gas area of the station			x	
248.		- Not more than 500 feet from the limits of the station			x	
249.		- ESD switches near emergency exits?			x	
250.	(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			x	
251.	(c)	Are ESDs on platforms designed to actuate automatically by...				
252.		- For unattended compressor stations, when:				
253.		▪ The gas pressure equals MAOP plus 15%?			x	
254.		▪ An uncontrolled fire occurs on the platform?			x	
255.		- For compressor station in a building, when				
256.		▪ An uncontrolled fire occurs in the building?			x	
257.		▪ 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	
258.	.171 (a) No compressor stations this location.	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			x	
259.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			x	
260.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			x	
261.	(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	
262.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			x	
263.	.173	Is each compressor station building adequately ventilated?			x	
264.	.457	Is all buried piping cathodically protected?			x	
265.	.481	Atmospheric corrosion of aboveground facilities			x	
266.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			x	
267.		Are facility maps current/up-to-date?			x	
268.	.615	Emergency Plan for the station on site?			x	
269.	.619	Review pressure recording charts and/or SCADA			x	
270.	.707	Markers			x	

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COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")			S	U	N/A	N/C
271.	.731	Overpressure protection – relief's or shutdowns			x	
272.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			x	
273.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			x	
274.	.736	Gas detection – location			x	

Comments:
 No compressor stations this location.