

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

S – Satisfactory    U – Unsatisfactory    N/A – Not Applicable    N/C – Not Checked  
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

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

Inspection Report			
<b>Docket Number</b>	PG-100042		
<b>Inspector Name &amp; Submit Date</b>	Stephanie Zuehlke, 4/17/2012		
<b>Sr. Eng Name &amp; Review/Date</b>	Joe Subsits, 4/20/2012		
Operator Information			
<b>Name of Operator:</b>	Cascade Natural Gas	<b>OP ID #:</b>	2128
<b>Name of Unit(s):</b>	Cowlitz County	<b>UNIT ID #:</b>	Longview
<b>Records Location:</b>	Longview, WA		
<b>Date(s) of Last (unit) Inspection:</b>	April 16, 2007 thru April 19, 2007	<b>Inspection Date(s):</b>	12.06-10.10; 12.13-17.10; & 01.05.11. Exit completed 01.05.11.

<b>Inspection Summary:</b>

<b>HQ Address:</b> CNG Corp. 8113 W. Grandridge Blvd. Kennewick, WA 99336	<b>System/Unit Name &amp; Address:</b> 1332 Vandercook Way Longview, WA 98632-3902	
<b>Co. Official:</b> Tim Clark T <b>Phone No.:</b> 2083776088 <b>Fax No.:</b> 5097379803 <b>Emergency Phone No.:</b> 8885221130	<b>Phone No.:</b> 3604231598 <b>Fax No.:</b> 3604254921 <b>Emergency Phone No.:</b> 8885221130	
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>
Tina Beach	Pipeline Safety Specialist	206.445.4121 cell/Kenn. 509.734.4576
Tom Wilson	General Manager	(360)423.1598 360.600.1922
Patti Chartrey	Pipeline Safety Specialist	

<b>WUTC staff conducted an abbreviated procedures inspection on 192 O&amp;M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.</b>		
(check one below and enter appropriate date)		
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	<b>Date:</b>

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<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	<b>Date:</b>	1.22-25.07
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**GAS SYSTEM OPERATIONS**

<b>Gas Supplier</b>		Williams	
<b>Services:</b> 2007: Residential 2437 Commercial 1094 Industrial 41 Other-0- 2010: Residential 2556 Commercial 1124 Industrial 42 Other0 Castlerock-76 Commercial – 44 Industrial – 0 Other – 0 Kalama – Residential – 167 commercial- 48 Industrial – 4 Other – 0 Kelso – Residential – 409 Commercial – 207 Industrial – 6 Other – 0 Longview Residential 1379 Commercial – 642 Industrial – 16 Other – 0 Woodland Residential – 525 Commercial – 183 Industrial – 16 Other – 0			
Number of reportable safety related conditions last year 0		Number of deferred leaks in system 2007: 20. 2010: 37	
Number of <u>non-reportable</u> safety related conditions last year 0		Number of third party hits last year 2007 Inspection total: 14 from sept 2005 to sept 2007, 13 total for 2006, and 1 for 2007 - 2007: 6 2008: 7 2009: 2 2010: 3	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) None		Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) 2" or smaller 122.5 mi.; 4" = 42.9 mi 6" = 5.1 mi 8" = 5.6; 12" = 10.4 mi. Copy of 2009 miles of main in folder.	
<b>Operating Pressure(s):</b>		<b>MAOP (Within last year)</b>	<b>Actual Operating Pressure (At time of Inspection)</b>
Feeder: HP Pipeline SMYS list in folder.	Gate in Woodland 150psig Gate at Kalama 300psig Kelso/Longview 250psig South Longview/Kelso 499 psig Castlerock 152psig Kalama 01 20 psig	Gate in Woodland 150 psig Gate at Kalama 300 psig Kelso/Longview 250 psig South Longview/Kelso 499 psig Castle Rock 152 psig Kalama 300 psig	Gate in Woodland 150 psig Gate at Kalama 300 psig Kelso/Longview 236 psig South Longview/Kelso 470 psig Castle Rock 150 psig Kalama 20 psig
Town:	Woodland: R-27 46 psig Woodland R-47 46 psig Castlerock: 150 psig Kelso: Kalama Longview:	Woodland: R-27 52 psig Woodland R-47 52 psig Castlerock: 40 psig Kelso: Longview: 60psig Kalama: 60psig South Longview/Kelso:60psig.	Woodland: R-27 46 psig Woodland: R-47 46 psig Castlerock: 40 psig Kelso: Kalama Longview:
Other:	Review Williams Annual maintenance reg/relief for applicable gates.	Williams Feeder and Annual Maintenance/Capacity in folder	Actuals in Folder
Does the operator have any transmission pipelines?		Yes but not in this District	
Compressor stations? Use Attachment 1.		None in this District	

<b>Pipe Specifications:</b>			
Year Installed (Range)	1918 to present	Pipe Diameters (Range)	1/2inch – 12inch
Material Type	Bare Steel & WSC and PE	Line Pipe Specification Used	API 5L/ ASTM D3350
Mileage	Total = 271.6 miles	SMYS % <20%	Anything w Hoop ≥ 20% SMYS?

**Operator Qualification Field Validation**

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**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** 12.15.10

**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:** No Transmission this District per CNG

**REPORTING RECORDS**

			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	<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</b> 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 <a href="mailto:opsgis@rspa.dot.gov">opsgis@rspa.dot.gov</a> stating that fact.</u>	x			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? Contact Rey to see when last updated and notify Tina of results. Okay per Rey in UTC mapping.	x			
3.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802) None in this District since 2007	x			
4.	191.15	Written reports; supplemental reports to PHMSA (Form F7100.2)				
5.	191.23	Filing the <b>Safety Related Condition Report</b> within 5 days of determination, but not later than 10 days after discovery None	x			
6.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports None	x			
7.	480-93-200(1)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours)</b> for events which results in;				
8.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None	x			
9.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; None	x			
10.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; 2007=0; 2008=0; 2009=0; 2010=2	x			
11.	480-93-200(1)(d)	The unintentional ignition of gas; None	x			
12.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; 2009=650 customers	x			
13.	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; 2008= R-21 in Woodland MAOP 150 w/spike @ 180psig.; 2010 in Castlerock MAOP of 152 w/spike of 168psig; 05.24.10	x			
14.	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 in 2010	x			
15.	480-93-200(2)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours)</b> for;				
16.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; 2009=1; 2010=0 2007= None	x			
17.	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; Reported also above in (1)(e).	x			
18.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment;	x			
19.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP Yes, 2007=1; 2008=1; 2009=0; 2010=1	x			
20.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				

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21.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	x			
22.	480-93-200(4)(b)	The extent of injuries and damage;	x			
23.	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			
24.	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			
25.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
26.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	x			
27.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	x			
28.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			
29.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	x			
30.	480-93-200(4)(j)	Line type;	x			
31.	480-93-200(4)(k)	City and county of incident; and	x			
32.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	x			
33.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	x			
34.	480-93-200(6)	Written report within 5 days of receiving the <b>failure analysis</b> of any incident or hazardous condition due to <b>construction defects or material failure</b>	x			
35.	480-93-200(7)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> for the proceeding calendar year				
36.	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			
37.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
38.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; Annual report 2010=2420 (December totals not in total since month is not over)	x			
39.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and	x			
40.	480-93-200(7)(b)(iii)	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 locate.	x			
41.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. Requested Tina provide info for years 2008 and 2009.	x			
42.	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			
43.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
44.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	x			

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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
45.	192.16 PV	<p><b>Customer notification</b> - Customers notified, within <b>90 days</b>, of their responsibility for those service lines not maintained by the operator</p> <p>(d) Each operator must make the following records available for inspection by the Administrator or a State agency participating under 49 U.S.C. 60105 or 60106: (2) Evidence that notices have been sent to customers within the previous 3 years.</p> <p>Requested documentation for Kemira Water Solutions, Inc. on Marine Rd. Longview – have not received info yet. Rec'd interruptible service customer contract.</p> <p>No evidence provided. EVIDENCE OF OTHER CUSTOMERS WITHIN LAST 3 YRS? None.</p>		x		
46.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? Tina will EFV CP 647 last update November 7, 2008. Std. fig. SDR-11 PE3408 RW Lyall – Lyco Stick Efv 1" and EFV II Series 450 ASTM 531238, D2513	x			
47.	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			
48.	192.383	If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate? Mandatory.	x			

<b>Comments:</b>
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CONSTRUCTION RECORDS			S	U	N/A	N/C
49.	480-93-013 PV	<p>OQ records for personnel performing New Construction covered tasks</p> <p>8 Covered Task Employees – David Swartz not up on OQ due to on the job injury – not gas related – he will be OQ'd on all needed before returning to work per Tom Wilson. Records for 8 employees. Tom Wilson, GM records not included.</p> <p>OQ documentation for summer help requested.</p> <p>PV: Rec'd. reports for B. Benson and D. Benson. Tom identified that these two summer employees were doing wrapping – OQ records show these two summer employees were not qualified. B. Benson since 08.10.2007 and D. Benson since 06.23.10.</p> <p>B. Benson completed applied cold-tape 1280DOT while out of compliance from 09.17.10 through 08.15.10; D. Benson completed applied cold-tape 1280DOT while out of compliance from 06.23.10 through 09.07.10. Also an A/C issue Copies in folder – B. Benson out of compliance approx. 5 weeks and D. Benson out of compliance approx. 4 wks. Due to span of control since B. Benson was qualified until 08.10.10 and these two kids always worked together for safety purposes.</p> <p>Tom identified that these two employees ALWAYS worked together.</p> <p>AOC: Tom identified that no leak surveying was completed by these two employees. No documentation showing that observation of wrapping occurred while OQ'd person observed because painting duties also potentially occurred at the same location – OQ'd person may not have observed the entire wrapping procedure – so not under span of control of OQ'd person.</p> <p>PV: Tom identified that he gave OQ tests to both summer help employees ID'd above. Tom Wilson OQ in folder shows that Tom was not OQ'd at the time he instructed the above employees in wrapping and A/C.</p>		x		

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CONSTRUCTION RECORDS			S	U	N/A	N/C
50.	192.225	Test Results to Qualify Welding Procedures – No changes	x			
51.	192.227	Welder Qualification	x			
52.	480-93-080(1)(b)	Appendix C Welders re-qualified <b>2/Yr (7.5Months)</b> API Standard 1104	x			
53.	480-93-080(2)	Plastic pipe joiners re-qualified <b>1/Yr (15 Months)</b> Reviewed Frank Kenneway on printed 11.09.10 which shows expiration on 11.23.10. Review occurred 12.08.10 and shows expired for only fuser in District. Tom provided copy of CNG fusion card 12.08.10 showing Frank requalified on September 23, 10 with expiration September 23, 2011. In folder.	x			
54.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period CNG requires annual.	x			
55.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners <b>1/Yr (12Months)</b> CNG requires annual	x			
56.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 (2) For casings installed after September 5, 1992, each gas pipeline company must attach separate test lead wires to each casing without vents, and to the steel gas pipeline to verify that no electric short exists between the two, and that an adequate level of cathodic protection is applied to the steel line pipe. Reviewed casing inspections for 2008-2010	x			
57.	480-93-115(3) and 192.323(b) & (d) PV	Sealing ends of casings or conduits on transmission lines and mains  480-115(3) (3) Whenever a gas pipeline company installs a main or transmission line in a casing or conduit of any type material, the gas pipeline company must seal the casing ends to prevent or slow the migration of gas in the event of a leak. The below identified casing has water in it – it can no longer prevent or slow the migration of gas in the event of a leak. 05.12.09: Annual casing survey report for 5610 Meeker, Kalama – casing potential read=1.451 Carrier read=1.397 passed Tinker-Razor w/no gas leak detected. When asked Tom about higher casing read than carrier read cause he identified water was in casing. Seals still okay – if not replace – if leak no rule requires digging. 04.30.08 Annual casing survey report for 5610 Meeker, Kalama – casing potential read=1.405 Carrier read=1.522 passed Tinker-Razor w/no gas leak detected. 03.11.07: Annual casing survey report for 5610 Meeker, Kalama – casing potential read=1.369 Carrier read=1.266 passed Tinker-Razor w/no gas leak detected. Copies in folder – okay if continue to monitor until short repaired. PV::::::192.323 Each casing used on a transmission line or main under a railroad or highway must comply with the following: (d) If vents are installed on a casing, the vents must be protected from the weather to prevent water from entering the casing. 03.11.07 at RR Trestle W. of I-5 on South Longview lateral: No casing or carrier read completed due to vent under 5' of water.. An AOC was identified WO 30898 was created – crew returned to obtain reads on 05.29.07 took a casing read of -0.492 was taken.		x		
58.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services CP 645.0515	x			
59.	192.241(a)	Visual Weld Inspector Training/Experience	x			
60.	192.243(b)(2)	Nondestructive Technician Qualification None	x			
61.	192.243(c)	NDT procedures API 1104. CP 766.04 and 760.10 cover NDT requirements. Bill Danko - NDT mandatory use >20% SMYS. Is 100% NDT. 4 x-ray tests with 1 failure – with repair and reshot. 4-12" taps NDT with Mag-particle 5 fittings total. 2010 June/July. Contractor provides their procedures to CNG for their review – CNG has no written NDT procedures.	x			
62.	192.243(f)	Total Number of Girth Welds None	x			
63.	192.243(f)	Number of Welds Inspected by NDT 5 sav-a-valve (non-girth) at 100%	x			
64.	192.243(f)	Number of Welds Rejected – One, see below	x			
65.	192.243(f)	Disposition of each Weld Rejected – fitted and repaired – testing results maintained in Engineering in Kennewick.	x			
66.	192.303	Construction Specifications CP's 600 , 700, and 800 series	x			

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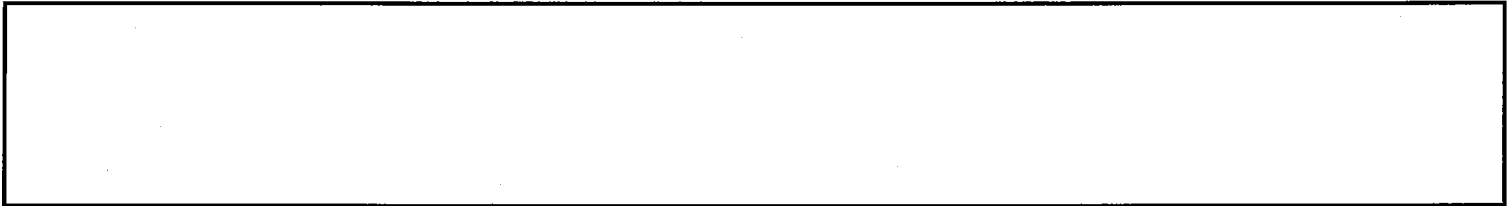
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CONSTRUCTION RECORDS			S	U	N/A	N/C
67.	192.325	Underground Clearance	x			
68.	192.327	Amount, location, cover of each size of pipe installed	x			
69.	480-93-160(1)	Report filed <b>45 days</b> prior to construction or replacement of transmission pipelines $\geq$ <b>100</b> feet in length None	x			
70.	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:	x			
71.	480-93-160(2)(a)	Description and purpose of the proposed pipeline;	x			
72.	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.	x			
73.	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	x			
74.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed;	x			
75.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route.	x			
76.	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;	x			
77.	480-93-160(2)(g)	Welding specifications; and	x			
78.	480-93-160(2)(h)	Bending procedures to be followed if needed.	x			
79.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress $\geq$ <b>20% SMYS</b> ?	x			
80.	480-93-170(7) PV	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) Jeff Woodall testing from Fab shop testing included on O-5 Odorizer records.  CP 665.037 – CNG did not comply with this CP for testing Woodland upgrade project. Chart does not contain, pipe sizes and lengths/footages installed. Approximately 2200' ranging from 1" – 4". This line operates/and is tested over 100psig. Pressure test records identified as tested at 375psig and 100psig with actual chart showing test occurred at 400psig and 115psig. Also, ambient temp recorded only for test-on – not the test-off.		x		
81.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed?	x			
82.	480-93-170(10) PV	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule): Chart box calibration occurs annually CP756.032K. Dial gauge calibration: Reviewed District Instrument/Gauge Calibration Report dated 04.29.10 through 11.17.10 with a date submitted to GM 05.03.10. There are 6 pieces of equipment added to the calibration records all are new dial gauges added between 06.08.10, 11.13.10, and 11.17.10. Merical Deadweight to Chandler for recal every 5 years. Deadweight went to Chandler for 5 yr recal just after above 11.17.10 recal of new guage. Requested 2009 recal records to compare. Reviewed and completed within 13 months. Okay Requested Snelson calibration records – Tina to provide Snelson Pressure gauge recal – reviewed 2009 provide 2010 - none provided			x	
83.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines $>$ <b>60 psig</b> None – this District does not lower HP they retire and install new.	x			
84.	480-93-175(4)	Leak survey within <b>30 days</b> of moving or lowering pipelines $\leq$ <b>60 psig</b> None	x			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
85.	192.517(a) PV	Pressure Testing (operates at or above 100 psig) – <b>useful life of pipeline</b> 1. 2010 R-27 and downstream distr. system in Longview up rated from 150psig to 250psig. 2. 2010 Alabama St. Replacement of 12” HP in Longview. 3. 2009 Replacement of 12” on Industrial Way approx 4300’ Longview 4. 2009 Replacement of 12” (1329’) on I-5 & STH 432 in Kelso a. Pressure test indicates a loss of 10psig (on 1030psig-off 1020psig) with no explanation. b. Copy of chart and test details in folder		x		
86.	192.517(b) PV And plan and Procedure aPV	Pressure Testing (operates below 100 psig, service lines, plastic lines) – <b>5 years</b> Tina providing Snelson guage calibration records. (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.  Tina providing copy of Snelson test records for 2009 Walmart project 2” & 4” – 4500’ approx. – did not show name of person but showed Snelson as person who performed test.  301 Crawford, Kelso (tested to 80psig. OK if MAOP is 53psig or less – requested MAOP information on this main). Copy in folder. Copy of 301 Crawford in folder under #86. This service is off R-20 and MAOP is 40psig. w/ relief set at max 43psig reg max lockup 39psig.		x		
87.	192.605(a) PV	Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> ) <b>Note:</b> Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09 <b><u>Steph: See advisory bulletin/email attached to OQ Form for details. Per Dave Lykken:</u></b> <i>Bottom line, it is PHMSA’s position that while the O&amp;M rule does not specifically require the OQ plan to be part of the operators O&amp;M manual, they do believe that the OQ plan review should be done annually as part of the manual review. I have modified the inspection checklist to reflect this opinion for discussion purposes only. As noted below an advisory bulletin cannot be used as an enforcement tool.</i> Procedure manual review not done on CP 710 Coating and Painting Standards. CNG is presently using Sherwin-Williams paint among others which does not require primer – all procedures appear to be written for Wasser paint and primer activities. Wasser paint is no longer used since xxxxxxxx. <u>Requested date info from Tina</u> Procedures need to reflect all paint and procdures used to apply it. Incl. all application manners and types of paint. See in folder.  -018(1) No records to show O&M Review for entire manual 2010. Last review in 2009. Tina said she provided this in an email.		x		
88.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	x			



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OPERATIONS and MAINTENANCE RECORDS		S	U	N/A	N/C	
89.	<p>Records, including maps and drawings updated within <b>6 months</b> of completion of construction activity? Survey completed but all casings not mapped. See construction records within 6 month completion. See #178 casings.</p> <p><i>(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.</i></p> <p><u>Finding:</u> Check mapping construction records for update within 6 months.</p> <p>1. Frontage Rd. S. of I-5 at RRxing between R32 &amp; R42 - Okay a. Piping Offset? b. Drawing in notes – check mapping</p> <p>2. 2007 construction mapping did not occur within required 6 months of completion Tina copying multiple examples. Stack of 330A's in folder 41 PV's.</p> <p>PV of -018(1) No records. 1. 1170 15<sup>TH</sup> Ave., Longview. . a. Meterless riser in alley N. of 1159 14<sup>th</sup> Ave. – Tent &amp; Rentals Company (1170 15<sup>th</sup> Ave.) b. Not mapped c. Never inspected/leak surveyed d. GM estimated service install in the 1950's. e. Wall loss exceeds 20% - no repair/replacement per CP 754.022</p> <p><u>Tina to provide 1060 &amp; 1260 OQ training</u> CNG procedures are as follows: .09 OPERATOR QUALIFICATION .091 OQ Task 1260 is required to perform external corrosion evaluations. OQ Task 1060 is required to assess wall loss. .092 Personnel assigned to Atmospheric Corrosion Surveys must be qualified for task 1260 and 1060.</p>		x			
90.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures CNG has a new form titled Job Safety Analysis (JSA) report that is more comprehensive than the Construction Inspection Checklists – which are still completed on a random basis. This is a step forward.	x			
91.	192.605(c)(4)??? PV	Periodic review of personnel work – effectiveness of abnormal operation procedures Reference R-03, Tent & Awning service, and the ambulance service – all three locations required pit gauge meas. But CNG Distr. unable to comply due to lack of proper equipment – CNG did not follow their procedures or identify to MGMT that procedures & or tools need to be tweaked.		x		
92.	192.609	Class Location Study (If applicable) None identified.	x			
93.		<b>Damage Prevention (Operator Internal Performance Measures)</b>				
94.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)	x			
95.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?	x			
96.	192.614	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	x			
97.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	x			
98.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	x			
99.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	x			

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100.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	x			
101.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys?	x			
102.		<b>Informational purposes only. Not Required.</b> Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? CNG just became member but have not yet begun data input. Operator may register at <a href="https://identity.damagereporting.org/cgareg/control/login.do">https://identity.damagereporting.org/cgareg/control/login.do</a> Y x    N	x			

<b>Comments:</b>
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103.	Emergency Response Plans		S	U	N/A	N/C
104.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response	x			
105.	192.615(b)(1)	Location Specific Emergency Plan – Reviewed E-plan. E-plan updates show 10.10 update for Odorizer list should be in Plan but 05.09 list is in plan. All other updates are in plan for 2010. Tina updated this sheet before I left – Change in odorization?	x			
106.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training Table top /safety meeting training completed E-Plan 05.20.10 No attendance sheet available but reviewed course and meeting minutes.	x			
107.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Reviewed leak survey/quarterly patrol/3 <sup>rd</sup> party damage reports.	x			
108.	192.615(c)	Liaison Program with Public Officials	x			
109.	192.616	Public Awareness Program				
110.	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			
111.		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.				
112.		API RP 1162 Baseline* Recommended Message Deliveries				



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120.	480-93-015(1) AOC	Odorization of Gas – Concentrations adequate? Form 314 has not been filled out in its entirety – CNG has identified this form as the location they will keep records – this information is documented elsewhere. I mentioned to CNG that they have ID'd the forms and forms should be completed. Capacity is not included, Injection Odorizer information not included.		x		
121.	480-93-015(2)	Monthly Odorant Sniff Testing (2) Each gas pipeline company must use an odorant testing instrument when conducting sniff tests. Sniff tests must be performed at least once monthly. CNG began documenting sniff test equipment SN on December 4, 2009. Reviewed records from Jan 2008-Nov2010: Woodland: No sniff tests conducted N of Odorizer O-05 for the NE area of Woodland. Kalama: No sniff tests conducted W. of the main feed in lower flow residential areas. (4 sniff tests conducted: 2 on 20psig Kalama Line from O-03) Kelso: No sniff tests conducted in East Central side of Kelso in lower flow residential area or N to deadend of Cowlitz Garden Rd. Longview: No sniff tests conducted in entire W side of Longview from map area 11 to map area 5 = 4.17 miles and M to E = 5.21 miles Totaling =21.73Square miles. Not checked for odorant. Approx. measmts. CNG is not sniff testing the extremities of their systems. No analysis completed to show best sniff test locations to accomplish this.  CNG has since added sniff test locations. Subsequent inspections have identified this issue in other Districts.		x		
122.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements No occurrences		x		
123.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Reviewed annual recal for the only Odorator SN 2000601001 for Heath recal on 03.16.09; 03.18.10 and repair/recal on 06.09-26.10; and recal at CNG meter shop 06.17-23.08. Equipment new in 2007 cal at factory.		x		
124.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? <b>1/yr(15 months)</b> Discussed during inspection. 1. R-17 a. Odorizer R17, V58 b. Sign does not have phone number c. SIGNS TOTALLY ILLEGIBLE 2. 121 Powell a. Illegible pipeline marker (old style blue flame – extremely faded & barely see blue flame insignia) b. 1P 3. Powell Rd. from gate station R-21/O-01 to I-5 a. BB bushes potentially growing over main i. Field leak survey btwn. marker @ 121 Powell and I-5 to verify ability to survey over the main.		x		
125.	480-93-124(4) PV	Markers reported missing or damaged replaced within <b>45 days?</b> Yes, this district is aware of and monitoring their markers. However, WO's for markers not = 29 not completed within 45 day requirement. In folder.		x		
126.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on Reviewed set/test info for changing meter out at 194 Mary Lp, Woodland (10.20.10) & 2231 Washington Way, Longview (10.19.10)		x		
127.	480-93-155(1)	Up-rating of system MAOP to <b>&gt;60 psig?</b> Procedures and specifications submitted <b>45 days</b> prior? None. R-27 and downstream distr. system in Longview up rated from 150psig to 250psig in 2010.		x		

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128.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? Reviewed leak investigation records – CNG has made new forms to better document leaks, follow-up, re-evaluation, etc. The form is three parts of Form 293A: Leak investigation, 293B: Leak Record, 293C Billable Damage/Loss Record. Reviewed: 2618 Fir St., Longview; 2810 Parkview Dr., Longview; 1407 N. 3 <sup>rd</sup> Ave, Kelso; 125 San Gabriel Ct., Kalama; 301 Crawford, Kelso (tested to 80psig. OK if MAOP is 53psig or less – requested MAOP information on this main). Copy of 301 Crawford in folder under #86. This service is off R-20 and MAOP is 40psig. w/ relief set at max 43psig reg max lockup 39psig.	x			
129.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and;	x			
130.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? Service requests are attached to the notification letter identifying foreign leak to customer if customer unavailable. Reviewed May 4, 2010 through December 2009.	x			
131.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within <b>30 days</b> of a leak repair? See #128 above records.	x			
132.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? Reviewed deferred leaks.	x			
133.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	x			
134.	480-93-188(1)	Gas leak surveys	x			
135.	480-93-188(2) PV and AOC	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) CP 756.032 identifies A. <u>Ultra Trac CGI</u> – same as (5) above. B. <u>Gas Sentry CGI</u> – same as (5) above. C. <u>Trak-It III CGI</u> - same as (5) above.  Number (5) in the CP is actually (E.). CP needs to be corrected.  Reviewed CNG Sensit #'s 4218, 4219, for 2009 & 2010 Also, 16786 & 16937 for 2010. Gas Sentry 0240101578 & 0239101537 for 2010. Trak-IT III for 1864 for 2009 & 2010. CNG voltmeter 03.16.10 reviewed 2009 - okay CNG FI completed daily – okay. CNG One Pyrometer Fluke 51 II – SN 83530056 for 2009 completed quarterly – 2010 frequency exceeded June 25, 2010 to November 9, 2010.  Snelson Pyrometer recal – reviewed 2008-2010. Records show recal only occurred annually but CP 756.032 N. requires a quarterly recal by the district for SN 43-1, 43-3 and 51-1. AOC: Also, 3 pyrometers on the list do not show they have been retired but have not been recal either.			x	

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136.	480-93-188(3) PV	<p>Leak survey frequency (Refer to Table Below) (3) Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:</p> <p>(a) Business districts - at least once annually, but not to exceed fifteen months between surveys. All mains in the right of way adjoining a business district must be included in the survey;</p> <p>Finding: These have not been met the required leak survey frequency. Below 1-3 are annual due to small business district and have been surveyed every five years exceeding the 15 months. #4 has never been leak surveyed since CNG took over gas system from Pacific Natural and Twin City Gas in 1962. #4 is in the business district. (#4 pit gauge meas. Showed a wall loss of</p> <ol style="list-style-type: none"> <li>1. 475 29<sup>th</sup> Ave. Hair Hut <ol style="list-style-type: none"> <li>a. Meterless riser</li> <li>b. Small Business District</li> <li>c. Check Annual Leak Survey and maps</li> </ol> </li> <li>2. 216 30<sup>th</sup> Ave. Longview Police Department <ol style="list-style-type: none"> <li>a. #276054</li> <li>b. Small Business District</li> <li>c. Check Annual Leak Survey and maps</li> </ol> </li> <li>3. 216 30<sup>th</sup> Ave. – Convenience Store (same structure as PD) <ol style="list-style-type: none"> <li>a. HO?</li> <li>b. Small Business District</li> <li>c. Check Annual Leak Survey and maps</li> </ol> </li> <li>4. Meterless riser in alley N. of 1159 14<sup>th</sup> Ave. – Tent &amp; Rentals Company (1170 15<sup>th</sup> Ave.) <ol style="list-style-type: none"> <li>a. No leak survey ever completed over service</li> <li>b. Estimated age of service 1950's per GM</li> <li>c. Self audits of leak survey records do not ensure records are accurate and complete. <ol style="list-style-type: none"> <li>i. No process in place for actively seeking out/reviewing system for these type of orphan services <ol style="list-style-type: none"> <li>1. GM ID'd that when they come across these types of services they correct</li> </ol> </li> </ol> </li> <li>d. No annual business district leak survey ever completed over service</li> </ol> </li> </ol>				
		Business Districts (implement by 6/02/07)	1/yr (15 months) PV See above			
		High Occupancy Structures New system (CC&B customer care & billing) System auto generates PBI WO for outside the BD as of 01.01.11. Presently the list is determined by engineering assoc. who signs customer up for service not the meter set people. List has been generated by the month.	1/yr (15 months) Reveiwed PBI's (inside and outside BD) from transition list created and maintained by Pat Bradford. No PBI can be dropped from the list except for limited employees such as Pat. Inside BD PBI are completed along with annual leak survey and cannot be reviewed and located as a separate PBI. Reviewed records for PBI –generated for completed September 2010 completed early in August 2010.			
		Pipelines Operating ≥ 250 psig	1/yr (15 months) Okay			
		Other Mains: CI, WI, copper, unprotected steel Completed twice per year	2/yr (7.5 months) None			
137.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs 2 on freeway at I-5 and STH 432 , 1 near Walmart (completed during area 1 BD survey	x			
138.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred	x			
139.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected Not within this inspection – these are on the KB pipeline which is operated by CNG for NWN	x			
140.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions - None	x			
141.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in	x			

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142.	480-93-188(5)	Gas Survey Records ( <b>Min 5 yrs</b> ) 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.	x															
143.	480-93-188(6)	Leak program - Self Audits 12.31.08 in folder. Effective? Etc. problems? Identified in previous and subsequent inspections re: effectiveness.	x															
144.	192.709	Patrolling (Transmission Lines) ( <b>Refer to Table Below</b> ) .705 None	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>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>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)
Class Location	At Highway and Railroad Crossings	At All Other Places																
1 and 2	2/yr (7½ months)	1/yr (15 months)																
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4	4/yr (4½ months)	4/yr (4½ months)																
145.	192.709	Leak Surveys (Transmission Lines) ( <b>Refer to Table Below</b> ) .706 None	x															
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr	7½ months																
4	4/yr	4½ months																
146.	192.603(b)	Patrolling Business District ( <b>4 per yr/4½ months</b> )	x															
147.	192.603(b)	Patrolling Outside Business District ( <b>2 per yr/7½ months</b> ) 192.721(b)(2)	x															
148.	192.603(b)	Leakage Survey - Outside Business District ( <b>5 years</b> ) 192.723(b)(1)	x															
149.	192.603(b)	Tests for Reinstating Service Lines 192.725	x															
150.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727	x															

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151.	192.709 PV for bolded	<p>Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 <b>§192.739 Pressure limiting and regulating stations: Inspection and testing.</b> <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 align="center"><i>(1) In good mechanical condition; (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed; (3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a); and (4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.</i></p> <p>1. R-08. a. Provide annual inspection/maintenance records i) Reviewed 2007-2010.- 2008 – legs require replacement (#330 32400 –found WO completed 06.19.2010 ii) Requested rupture disk info on 634 – CNG provided Fisher Bulletin (no records of disk range) CNG Regulator Station Facility Maintenance &amp; Inspection Records fail to identify the shatter pressure and/or color code for the fracture disk. b. Relief flag noted as tripped 04.15.10 – Check records for documentation noting flag reset. c. Abandoned piping this location? Abandoned for future use. d. Much A/C this location. Hot side/outlet no A/C check done. e. Check rectifier ? 2. R-43 – a. The pressure tag at R-43 identifies it is set at 16psig. b. The regulator station set point list identifies the set pressure at 35psig. c. Please provide annual inspection/maintenance records for review for 2007 through 2010. 3. Chart Box location SW of 106 19<sup>th</sup> Ave. CP - okay a. Mapped on DeLorme b. What is monitored at this location? 4. <b>R-19 – PJ – Copy in folder. WO to replace cap not completed.</b> a. <b>13<sup>th</sup> and Mt Brynion</b> b. Old vent cap – not in good mechanical condition 5. R-18 – PJ – records okay. a. R18 farm tap b. Old style cap and not flag on it 6. <b>CNG &amp; Williams Regulator Set Point Lists have a 2psig discrepancy in MAOP settings as follows:</b> a. CNG ----- “Regulator Set Point List” ID’s R-21 @ Powell Rd., Castlerock as: i) <b>MAOP Inlet = 152psig MAOP Outlet = 40psig</b> b. Williams----- “Delivery/Alarm List” ID’s R-21 @ Powell Rd., Castlerock as: i) <b>MAOP Outlet= 150psig w/reg set at 140psig &amp;</b> ii) <b>Relief Set pt. at 165psig (this relief is set at 110% of CNG MAOP of 150psig (see above CNG MAOP identification as 152psig for this section))</b></p>				
152.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 CNG & Williams caps in folder.	x			
153.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 None	x			
154.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 Reviewed 2009 & 2010 records	x			
155.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) All serviceline valves installed prior to institution of SLV requirements received a V-XX numbers and inspected annually. There are presently one service line valves in system - SLV-01	x			
156.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 Only one vault that qualifies – V-12 at Hemlock & Garfield at 256CF (8” valve) A/C done on valve maintenance sheet okay 2009 & 2010.	x			



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157.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 CNG calls hot work permit a JSA : job safety analysis	x			
158.	192.603(b)	Welding – Procedure 192.225(b)	x			
159.	192.603(b)	Welding – Welder Qualification 192.227/.229	x			
160.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2)	x			
161.	192.709	NDT Records ( <b>pipeline life</b> ) .243(f) Reviewed records of Longview sewer infrastructure project. None.	x			
162.	192.709	Repair: pipe ( <b>pipeline life</b> ); Other than pipe ( <b>5 years</b> )None	x			
163.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's)	x			

**Comments:**

§192.365 **Service lines: Location of valves.** Reviewed at time of inspection.

(b) *Outside valves. Each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building.*

1. 230 Davidson in Alley
  - a. CP -1.255
  - b. #253657
  - c. Valve partially buried

CORROSION CONTROL RECORDS			S	U	N/A	N/C
164.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 ( <i>for buried pipelines installed after 7/31/71</i> )	x			
165.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction ( <i>after 7/31/71</i> )	x			
166.	192.465(a)	Annual Pipe-to-soil Monitoring ( <b>1 per yr/15 months</b> ) for short sections ( <b>10% per year; all in 10 years</b> )	x			
167.	192.491	Maps or Records .491(a)	x			
168.	192.491	Examination of Buried Pipe when exposed .459	x			
169.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	x			
170.	192.491	Annual Pipe-to-soil monitoring ( <b>1 per yr/15 months</b> ) .465(a)	x			
171.	192.491	Rectifier Monitoring ( <b>6 per yr/2½ months</b> ) .465(b) Reviewed 2009 & 2010	x			
172.	192.491	Interference Bond Monitoring – Critical ( <b>6 per yr/2½ months</b> ) .465(c)	x			
173.	192.491	Interference Bond Monitoring – Non-critical ( <b>1 per yr/15 months</b> ) .465(c)	x			
174.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	x			
175.	480-93-110(3) PV	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. Snelson Half-cell recal to occur annually. None of the half-cells in list show 2010 recal, 2 show last recal in 2008 and 3 show recal in 2009. All half-cells are shown as passing with no retirements. Snelson Volt meters calibrated 09.22.09 – annual recal required. Provide 2010 recal-none provided		x		
176.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas ( <b>1 per 3 cal yr/39 months</b> ) .465(e) Bare pipe inspected twice annually – Bare pipe is on a deep well installed in 2009.	x			
177.	192.491	Electrical Isolation ( <b>Including Casings</b> ) .467	x			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
178.	480-93-110(5) AOC here and under mapping	<p>Casings inspected/tested annually not to exceed <b>fifteen months</b>                      Survey and mapping in folder. Survey shows one casing full of water and one vent under water. Survey completed but all casings not mapped. See construction records within 6 month completion.                      Check mapping construction records for update within 6 months – <b>CASINGS</b> identified.</p> <ol style="list-style-type: none"> <li>1. There is a casing located at Johnson and Mt Brynion. Longview. Okay not a casing.</li> <li>2. Frontage Rd. S. of I-5 at RRxing between R32 &amp; R42                             <ol style="list-style-type: none"> <li>a. Okay</li> </ol> </li> <li>3. 404 Henderson Dr.                             <ol style="list-style-type: none"> <li>a. 2 Casings @ RRxing N of V-71 Okay</li> </ol> </li> <li>4. Atlantic &amp; Goerig St.                             <ol style="list-style-type: none"> <li>a. Casing location – Not on grid or CAD but is being surveyed.</li> </ol> </li> <li>5. Buland Dr. &amp; Powell Rd. casing – SE corner                             <ol style="list-style-type: none"> <li>a. Damaged vent pipe</li> <li>b. On survey list but not on grid but is on CAD.</li> </ol> </li> <li>6. Buland Dr. &amp; Powell Rd. casing – N side of intersection                             <ol style="list-style-type: none"> <li>a. Damaged vent pipe</li> <li>b. Sign &amp; vent pipe not visible – covered w/juniper tree/vegetation</li> <li>c. Okay</li> </ol> </li> <li>7. Powell Rd. RRxing W. of Buland Dr.                             <ol style="list-style-type: none"> <li>a. Vent pipe – a single vent pipe on E side of RRxing</li> <li>b. Carsonite marker on W side of RRxing</li> <li>c. Okay</li> </ol> </li> <li>8. RO3 – E of 841 3<sup>rd</sup> Ave                             <ol style="list-style-type: none"> <li>a. CASING under tracks                                     <ol style="list-style-type: none"> <li>i) Sign #8005520619</li> <li>ii) Checked mapping and it was not mapped</li> <li>iii) Surveyed – not on grid and not on CAD</li> <li>iv)</li> </ol> </li> </ol> </li> </ol> <p>Tina will provide details on vent maintenance/monitoring. – Did not receive/was not provided</p>		x		
179.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	x			
180.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within <b>90 days</b> 1117 3 <sup>rd</sup> Ave. repair completed within 3 days – short.	x			
181.	480-93-110(5)(c)	Casing shorts cleared when practical None	x			
182.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. <b>Twice annually/7.5 months</b> None.	x			
183.	192.491	Interference Currents .473	x			
184.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)	x			
185.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	x			
186.	192.491	Internal Corrosion Control Coupon Monitoring ( <b>2 per yr/7½ months</b> ) .477	x			
187.	192.491	<p>Atmospheric Corrosion Control Monitoring (<b>1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore</b>) .481 Completed during leak survey. Document on revers side of survey sheet all AOC's and prepare a WO where it is placed in a stack for completion now totals 280 WO's for Longview only list of 280 does not include Kelso, Kalama, Castlerock, and Woodland. CNG procedure 754.037 states, The General Manager shall issue work orders for the repainting or repair of the "Needs Paint" and "Needs Repair" meters, risers, or HPSS noted on the survey. Remedial action will be scheduled based on the condition found, but shall be completed no later than the next survey of that location. (3 years maximum.)                      The 280 WO's were compiled in 2010 A/C inspection with completion required no later than the next A/C survey of that location NTE 3 years. CNG mgr identified lack of manpower to remediate at time of inspection.                      Regulator station R-03</p>		x		

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
188.	192.491 PV under OQ	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Identified under OQ PV: OQ documentation for summer help requested. Rec'd. reports for B. Benson and D. Benson. Tom identified that these two summer employees were doing wrapping – OQ records show these two summer employees were not qualified. B. Benson since 08.10.2007 and D. Benson since 06.23.10. B. Benson completed applied cold-tape 1280DOT while out of compliance from 08.10.10 through 08.15.10; D. Benson completed applied cold-tape 1280DOT while out of compliance from 06.23.10 through 08.10.10. Also an A/C issue Copies in folder.	x			

**Comments:**

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
189.	192.161	Supports and anchors In complaint 110443		x		
190.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	x			
191.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	x			
192.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	x			
193.	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			
194.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?	x			
195.	480-93-015(1)	Odorization	x			
196.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel? See above mapping/records – re: 6 mos.	x			
197.	192.179	Valve Protection from Tampering or Damage	x			
198.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) Included under above insp report for R03, and 1170 15 <sup>th</sup> Ave, Longview, etc.		x		
199.	192.463	Levels of cathodic protection	x			
200.	192.465	Rectifiers	x			
201.	192.467	CP - Electrical Isolation	x			
202.	192.476	Systems designed to reduce internal corrosion	x			
203.	192.479 PV for bolded	Pipeline Components exposed to the atmosphere: <b>(a) General: Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.</b> The following locations have piping without coating: 1. 236 Kelso Drive, Kelso – Savianos Pizza a. No coating b. #669848 2. 180 Industrial Way, Kelso a. No coating b. #285389 3. 760 "K" Ocean Beach Hwy. a. #165770 b. Riser has concrete on it that has been painted – Potential OQ & A/C issue: not an approved coating 4. #585046 Rose Tree Restaurant a. CP -1.304 b. A/C under stopcock btwn wrap & valve fig. 5. <b>Meterless riser in alley N. of 1159 14<sup>th</sup> Ave. – Tent &amp; Rentals Company (1170</b>		x		

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		<p>15<sup>th</sup> Ave.)</p> <ul style="list-style-type: none"> <li>a. A/C – Field estimated 20%-30% pipe loss due to pitting</li> <li>b. Staff requested that they hold for review during upcoming inspection</li> <li>c. Exposed pipe at damaged wrap area</li> <li>d. Service (corroded section) replace (wall loss measurements of 0.02 and 0.03 were taken after removal (20% = 0.0266) Corrective action (repair/replace) not taken prior to wall loss exceeded 20% Procedures CP 754.022 require repair/replacement when wall loss exceeds 20%.</li> </ul> <p><u>Finding:</u> The following locations have potential interface issues. Reviewed during inspection</p> <ul style="list-style-type: none"> <li>1. 417 20<sup>th</sup> – Laundromat               <ul style="list-style-type: none"> <li>a. #290911</li> <li>b. No interface</li> </ul> </li> <li>2. 404 Davidson, Woodland – Woodland Garage               <ul style="list-style-type: none"> <li>a. No interface</li> </ul> </li> <li>3. Atty. Bldg. (L.R. Lovejoy) on Davidson in Alley, Woodland               <ul style="list-style-type: none"> <li>a. Peeling wrap</li> <li>b. #189175</li> </ul> </li> <li>4. #232437 “1315”, Longview               <ul style="list-style-type: none"> <li>a. Unable to determine interface integrity</li> <li>b. Review CNG procedures/OQ for proceed</li> </ul> </li> <li>5. #179789, Longview               <ul style="list-style-type: none"> <li>a. No interface</li> </ul> </li> <li>6. 1203/1207 14<sup>th</sup> Ave., Longview               <ul style="list-style-type: none"> <li>a. #254659</li> <li>b. Encased in Concrete</li> <li>c. No interface</li> <li>d. New wrap but no interface remediation – OQ issue?</li> </ul> </li> <li>7. Meterless riser in alley N. of 1159 14<sup>th</sup> Ave. – Tent &amp; Rentals Company (1170 15<sup>th</sup> Ave.), Longview               <ul style="list-style-type: none"> <li>a. A/C – Field estimated 20%-30% pipe loss due to pitting</li> <li>b. No interface</li> </ul> </li> <li>8. 1116 15<sup>th</sup> Ave., Longview               <ul style="list-style-type: none"> <li>a. Interface issue – in concrete</li> <li>b. #574761</li> </ul> </li> <li>9. #292074, Castlerock               <ul style="list-style-type: none"> <li>a. CP -1.240</li> <li>b. Peeling wrap</li> </ul> </li> <li>10. 1321 14<sup>th</sup> Ave., Kelso               <ul style="list-style-type: none"> <li>a. 3P</li> <li>b. Bad interface wrap</li> </ul> </li> <li>11. 204 Leaming Ave., Castlerock – Eiches Laundry               <ul style="list-style-type: none"> <li>a. Damaged interface wrap</li> <li>b. #588914</li> </ul> </li> <li>12. #636418, Kelso               <ul style="list-style-type: none"> <li>a. Riser w/interface issues</li> </ul> </li> </ul>				
204.	192.481 PV for Bold listings	<p>Atmospheric Corrosion: monitoring</p> <p><b>(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere or 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</b></p> <p><u>Finding:</u> Reviewed during inspection. Check operator A/C monitoring for the following locations:</p> <ul style="list-style-type: none"> <li>1. 2212-1/2 Parrott Way, Kelso (South Bldg.)               <ul style="list-style-type: none"> <li>a. Brush/Blackberry overgrown</li> </ul> </li> <li>2. 618 First St., Kelso               <ul style="list-style-type: none"> <li>a. Meterless riser – residential set</li> <li>b. A/C last done?</li> </ul> </li> <li>3. 2204 Parrott Way, Kelso – Western Fire Center</li> </ul>		x		

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		<ul style="list-style-type: none"> <li>a. #226863</li> <li>b. A/C last done?</li> </ul>				
		4. 558 Industrial Way, Kelso				
		<ul style="list-style-type: none"> <li>a. Meterless riser w/reg</li> </ul>				
		5. 848 15 <sup>th</sup> Ave., Longview – Topper’s Restaurant				
		<ul style="list-style-type: none"> <li>a. #288685</li> <li>b. VAULT – check out coating &amp; A/C last done</li> </ul>				
		6. 1315 _____, Longview – Professional Bldg.				
		<ul style="list-style-type: none"> <li>a. VAULT</li> </ul>				
		7. 1146 Commerce – Pals/Salon				
		<ul style="list-style-type: none"> <li>a. #273756</li> <li>b. Exhaust vent deposition on meter</li> </ul>				
		8. R-08 Douglas & Alder St.				
		<ul style="list-style-type: none"> <li>a. Abandoned piping in place?</li> <li>b. A/C</li> </ul>				
		9. 1465 Baltimore St.				
		<ul style="list-style-type: none"> <li>a. Meterless riser</li> </ul>				
		10. Wilson Dr. – Decorative Concrete Supplies				
		<ul style="list-style-type: none"> <li>a. #218581</li> </ul>				
		11. Bozarth & Park SE Corner S. meter set across from 190 Bozarth				
		<ul style="list-style-type: none"> <li>a. Meterless riser</li> </ul>				
		12. Bozarth & Park SE Corner Ctr. Meter set				
		<ul style="list-style-type: none"> <li>a. Meterless riser</li> </ul>				
		13. Bozarth & Park SE				
		<ul style="list-style-type: none"> <li>a. Meterless riser</li> </ul>				
		14. 603 Royal St. W. – AMR: American Medical Response (Ambulance Service)				
		<ul style="list-style-type: none"> <li>a. Bad corrosion issues under wrap below svc. Valve – notified CNG <ul style="list-style-type: none"> <li>i. GM identified they would retire or replace svc.</li> <li>ii. Staff requested that they save riser for review during upcoming inspection</li> </ul> </li> <li>b. Meterless riser</li> </ul>				
		15. Meterless riser in alley N. of 1159 14 <sup>th</sup> Ave. – Tent & Rentals Company (1170 15 <sup>th</sup> Ave.)				
		<ul style="list-style-type: none"> <li>a. A/C – Field estimated 20%-30% pipe loss due to pitting</li> <li>b. Staff requested that they hold for review during upcoming inspection</li> <li>c. GM identified this service has never been inspected</li> <li>d. Estimated age of service 1950’s per GM</li> <li>e. Service (corroded section) replace (wall loss measurements of 0.02 and 0.03 were taken after removal (30% = 0.0399) Corrective action not taken before allowed 20% loss occurred. CP 754.022.</li> </ul>				
		16. R-03				
		<ul style="list-style-type: none"> <li>a. A/C</li> <li>b. Pitting</li> <li>c. No measurement</li> <li>d. Leaks</li> </ul>				
		17. 160 Henderson				
		<ul style="list-style-type: none"> <li>a. 7 separate services</li> <li>b. 1 meterless riser out of 7 above services</li> <li>c. Check A/C records</li> <li>d. Covered w/vegetation – very steep bank to structure – difficult access</li> </ul>				
		18. 20 Cowlitz St. W.				
		<ul style="list-style-type: none"> <li>a. Meterless riser</li> </ul>				
		19. Meterless riser W. of NW corner 1 <sup>st</sup> Ave. & Huntington				
		20. 500A W. Main St. & 5 <sup>th</sup> Ave. NW				
		<ul style="list-style-type: none"> <li>a. Locates show svc. Markings to underground meter vault or potential inside meter.</li> </ul>				
		21. #636418				
		<ul style="list-style-type: none"> <li>a. 2 meter manifold with support missing at nipple – potential A/C inspection issue</li> </ul>				
		22. 2401 Talley Way, Kelso				
		<ul style="list-style-type: none"> <li>a. #288610</li> <li>b. Additional meterless riser this location</li> </ul>				
		23. 180 Industrial Way, Kelso				
		<ul style="list-style-type: none"> <li>a. A/C last done?</li> <li>b. #285389</li> </ul>				

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		24. 475 29 <sup>th</sup> Ave. Hair Hut a. Meterless riser 25. 1910 Davidson Ave., Suite C, Woodland a. Tack weld supports 26. 108 Front Ave. SW, Castlerock a. Full encirclement weld support nipple – open (no support installed) A/C issue b. #276986/#209183				
205.	192.491	Test Stations – Sufficient Number .469	x			
206.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
207.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	x			
208.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	x			
209.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	x			
210.	192.605	Knowledge of Operating Personnel	x			
211.	480-93-124	Pipeline markers Reviewed >250psig 2009 and 2010. 2009 did not identify pipeline markers on their survey maps in accordance with CNG procedures 715. 2010 – 1 WO for marker replacement was not generated, and 1 WO generated that but not complete. Written under above		x		
212.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days</b> ? See WO identified in #211 above generated 07.30.10 but not completed for 2010 HP survey Kalama		x		
213.	192.719	Pre-pressure Tested Pipe ( <b>Markings and Inventory</b> )	x			
214.	192.195	Overpressure protection designed and installed where required?	x			
215.	192.739/743	Pressure Limiting and Regulating Devices ( <b>Mechanical/Capacities</b> )	x			
216.	192.741	Telemetry, Recording Gauges	x			
217.	192.751	Warning Signs	x			
218.	192.355 AOC	Customer meters and regulators. Protection from damage <i>(b) Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must:</i> <i>(1) Be rain and insect resistant;</i> <i>(2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and,</i> <i>(3) Be protected from damage caused by submergence in areas where flooding may occur.</i>  <u>Finding: AOC</u> The following locations had regulators installed in a horizontal orientation:  1. 2401 Talley Way, Kelso 2. #290744 3. #588989 a. Relief vent nearly fully closed by moss growth over screen  <u>Finding: Reviewed during inspection.</u> Review gas associated substructures (vault) locations for potential of water, ice, and soil accumulation around service regulator vent and accessibility. Also check A/C records for these service vault locations.  1. 848 15 <sup>th</sup> Ave., Longview – Topper’s Restaurant a. #288685 b. CP-0.949 c. VAULT – check out coating & A/C last done 2. 1315 _____, Longview – Professional Bldg. a. VAULT 3. Kingwood St., Kalama a. VAULT type – service/reg sta? 4. 500A W. Main St. & 5 <sup>th</sup> Ave. NW, Kelso a. Locates show svc. Markings to underground meter vault or potential inside		x		

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		meter.				
219.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	x			
220.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? Written as AOC under 192.355	x			
221.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	x			
222.	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			
223.	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			
224.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? <b>Yes</b> <b>No</b> x				
225.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?None	x			
226.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?None	x			
227.	192.745	Valve Maintenance (Transmission) None	x			
228.	192.747	Valve Maintenance (Distribution)	x			

**Facility Sites Visited:**

Facility Type	Facility ID Number	Location

**Comments:**

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

<b><u>Number</u></b>	<b><u>Date</u></b>	<b><u>Subject</u></b>
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-08-01	May 13, 2008	Pipeline Safety - Notice to Operators of Gas Transmission Pipelines on the Regulatory Status of Direct Sales Pipelines
ADB-08-02	March 4, 2008	Pipeline Safety - Issues Related to Mechanical Couplings Used in Natural Gas Distribution Systems
ADB-08-03	March 10, 2008	Pipeline Safety - 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
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

For more PHMSA Advisory Bulletins, go to <http://ops.dot.gov/regs/advise.htm>



## Attachment 1

### Distribution Operator Compressor Station Inspection

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

229.		<b>.605(b)</b>		<b>COMPRESSOR STATION PROCEDURES</b>				<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
230.		.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service						x		
231.		.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units						x		
232.		.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices <b>(1 per yr/15 months), prompt repair or replacement</b>						x		
233.		.735	(a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings						x		
234.			(b) Tank must be protected according to <b>NFPA #30</b>						x		
235.		.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems <b>(must be performance tested), unless:</b>						x		
236.			• <b>50% of the upright side areas</b> are permanently open, or						x		
237.			• It is an unattended field compressor station of <b>1000 hp or less</b>						x		

**Comments:**  
 No compressor stations in Cowlitz District

<b>COMPRESSOR STATION O&amp;M RECORDS</b>				<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
238.	.709	.731(a)	Compressor Station Relief Devices <b>(1 per yr/15 months)</b>			x	
239.		.731(c)	Compressor Station Emergency Shutdown <b>(1 per yr/15 months)</b>			x	
240.		.736(c)	Compressor Stations – Detection and Alarms <b>(Performance Test)</b>			x	

**Comments:**  
 No compressor stations in Cowlitz District

<b>COMPRESSOR STATIONS INSPECTION (Field)</b>				<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
(Note: Facilities may be “Grandfathered”)							
241.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			x	
242.			Door latch must open from inside without a key			x	
243.			Doors must swing outward			x	
244.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			x	
245.			Each gate located within 200 ft of any compressor plant building must open outward			x	
246.			When occupied, the door must be opened from the inside without a key			x	
247.		(e)	Does the equipment and wiring within compressor stations conform to the <b>National Electric Code, ANSI/NFPA 70?</b>			x	
248.	.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”)						
249.	(b)	Do the liquid separators have a manual means of removing liquids?			x	
250.		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	
251.	.167 (a)	ESD system must:				
252.		- Discharge blowdown gas to a safe location			x	
253.		- Block and blow down the gas in the station			x	
254.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x	
255.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage				
256.		ESD system must be operable from at least two locations, each of which is:				
257.		- Outside the gas area of the station			x	
258.		- Not more than 500 feet from the limits of the station			x	
259.		- ESD switches near emergency exits?			x	
260.	(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	
261.	(c)	Are ESDs on platforms designed to actuate automatically by...				
262.		- For unattended compressor stations, when:				
263.		▪ The gas pressure equals MAOP plus 15%?			x	
264.		▪ An uncontrolled fire occurs on the platform?			x	
265.		- For compressor station in a building, when				
266.		▪ An uncontrolled fire occurs in the building?			x	
267.		▪ 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	
268.	.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	
269.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			x	
270.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			x	
271.	(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	
272.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			x	
273.	.173	Is each compressor station building adequately ventilated?			x	
274.	.457	Is all buried piping cathodically protected?			x	
275.	.481	Atmospheric corrosion of aboveground facilities			x	
276.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			x	
277.		Are facility maps current/up-to-date?			x	
278.	.615	Emergency Plan for the station on site?			x	
279.	.619	Review pressure recording charts and/or SCADA			x	
280.	.707	Markers			x	
281.	.731	Overpressure protection – relief’s or shutdowns			x	
282.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			x	

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
283.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			x	
284.	.736	Gas detection – location			x	

**Comments:**

No compressor stations in Cowlitz District