

**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 Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Docket Number	PG-100044		
Inspector Name & Submit Date	Stephanie Zuehlke		
Sr. Eng Name & Review/Date	Joe Subsits		
Operator Information			
Name of Operator:	Cascade Natural Gas Corporation	OP ID #:	2128
Name of Unit(s):	Yakima/Sunnyside	UNIT ID #:	Yakima/ Sunnyside
Records Location:	Yakima and Sunnyside		
Date(s) of Last (unit) Inspection:	June 18-27, 2007	Inspection Date(s):	August 23 – 27, 30 & 31, September 1 – 3 & 13 – 16, 2010

Inspection Summary:

Location designation for this district: Yakima=Y and Sunnyside=SS

HQ Address: 222 Fairview Ave N Seattle, WA 98109-5312	System/Unit Name & Address: 701 S. First Ave., Yakima 98902	
Co. Official: Eldon Book Phone No.: 208.377.6088 555 S. Cole Rd., Boise 83709 Fax No.: 208.377.6088 Emergency Phone No.: 888.522.1130	Phone No.: 509.457.8176 Yakima Office Fax No.: 509.457.5539 Emergency Phone No.: 888.522.1130 Office 509.837.2407 Fax 509.837.3485	
Persons Interviewed	Title	Phone No.
Keith Meissner	Mgr., Safety & Compliance	206.381.6734/c-206.861.6593
Tina Beach	Pipeline Safety Specialist	Seattle 206.381.6725/206.445.4121 cell/Kenn. 509.783.7361
Jeff Staudenmaier	General Manager	509.494.2137

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:
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<input type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	Jan. 22-25, 2007
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GAS SYSTEM OPERATIONS

Gas Supplier		Williams	
Services: <i>Residential</i> 19703 Yak <i>Commercial</i> 3385 Yak <i>Industrial</i> 79 Yak <i>Other</i> 0 OLDEST PIPE IN Yakima District was installed 1956 was ½" to 16" <i>Residential</i> 5594SS <i>Commercial</i> 1403 SS <i>Industrial</i> 47 SS <i>Other</i> 0 SS: <i>Residential</i> – Grandview 942 <i>Commercial</i> 180 <i>Industrial</i> 11 SS: <i>Residential</i> – Granger 190 <i>Commercial</i> 46 <i>Industrial</i> 01 SS: <i>Residential</i> – Prosser 144 <i>Commercial</i> 127 <i>Industrial</i> 07 SS: <i>Residential</i> – Sunnyside 1791 <i>Commercial</i> 514 <i>Industrial</i> 23 SS: <i>Residential</i> – Toppenish 898 <i>Commercial</i> 239 <i>Industrial</i> 13 SS: <i>Residential</i> – Wapato 344 <i>Commercial</i> 115 <i>Industrial</i> 08 SS: <i>Residential</i> – Zillah 416 <i>Commercial</i> 96 <i>Industrial</i> 02			
System-wide Services reported on annual forms. <i>Residential</i> 199711 <i>Commercial</i> 4940 <i>Industrial</i> 188 <i>Other</i> 12			
Number of reportable safety related conditions last year		0	
Number of deferred leaks in system		Y-0 SS-0	
Number of <u>non-reportable</u> safety related conditions last year		Y-0 SS-0	
Number of third party hits last year		Y-34 SS-XX	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)		Y-0 SS-0	
Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)		Y-Total=418.8 Y- Class 3 & 4=Not identified SS-Total=205.9 SS-Class 3&4 not identified	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Y: Selah = 250 Y: Moxee = 250 Y: Yakima = 200 SS: Sunnyside = SS: Grandview = SS: Prosser = SS: Zillah =	250 Design=300 250 Design=300 200 Design=300 400	246 per most recent annual maint. records 237 per most recent annual maint. records 186 per most recent annual maint. records 400
Town:	Y: Union Gap – Fed out of Yakima @ 60psig Moxee: 60psig and 30psig Selah: 60psig Yakima: 60psig SS: Toppenish, Wapato, and Granger	60psig R-43 60psig R-12 60psi R-17 60psi-R-43	56psig 52psig 30psig:30psig 54psig 56psig
Other:	Y: Requested Annual maintenance for Williams reg and relief at gate Stations: CNG keeps these records.- Tina identified she forwarded 2010 records via email. SS: Requested Williams info for reg and relief at gates.		
Does the operator have any transmission pipelines?		-0- in Yakima and SS	
Compressor stations? Use Attachment I.		-0- in Yakima and SS	

Pipe Specifications:			
Year Installed (Range)	Y: OLDEST PIPE IN DISTRICT WAS INSTALLED I 1956 WAS 1/2 TO 16" SS: 5/8" – 8"	Pipe Diameters (Range) ½"-16" Y ½"-8" SS	PE range: 5/8"-6" both areas WSC range: 1/2"-16" both areas
Material Type	PE & Steel	Line Pipe Specification Used	API 5L/ ASTM 2513- D3350
Mileage	PE= miles in Yakima-101 WSC= miles in Yakima-336 PE= 44 miles in Sunnyside WSC=173 miles in Sunnyside	SMYS % Yakima : <20% Sunnyside: <20%	Anything w Hoop ≥ 20% SMYS- None

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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** Yakima 09.02.10 Sunnyside 09.16.10

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 in Yakima or Sunnyside.

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. March 3, 2010 OP ID: 02128. Submitted data full replaced.	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? Nothing operating over 250psig in Yakima or Sunnyside.	x			
3.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802) Yes- 904886 due to exceeding 50K damage None in SS	x			
4.	191.15	Written reports; supplemental reports to PHMSA (Form F7100.2) None	x			
5.	191.23	Filing the Safety Related Condition Report 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 in either	x			
7.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
8.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None in either	x			
9.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; Yes – 1 on May 2009 Yakima none in SS	x			
10.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; of 25 or more in Distr.	x			
11.	480-93-200(1)(d)	The unintentional ignition of gas; Yes, 1 on May 5, 2009. Same as above NRC report. None in SS	x			
12.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; Y-None SS: 34 customers in Zillah 11.19.09	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; No exceed MAOP since 2007 Exceed MAOP SS: 07.19.07 Grandview; 07.22.07 Granger; 11.28.07 Yakima; 01.02.08 at Granger gate 10.01.09 Yakima	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; 2 house fires: 302 S 2 nd St., Yakima on 02.24.07 and the other July 2, 2007 (Just after inspection) Both emailed notification by Sam to Patti and the other to Joe..	x			
15.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
16.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; Must be reported within 24 hrs. None in Yakima for 2008, 2009 and 2010	x			

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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; None for 2008, 2009, and 2010	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; or None for 2008, 2009, and 2010	x			
19.	480-93-200(2)(d) PV	A gas pipeline pressure exceeding the MAOP R-10 overpressurization April 7, 2007 (reviewed charts on April 16, 2007) = MAOP 250 reached 252. CNG determined chart error – chart was recalibrated. R-1 November 28, 2007, overpressure Yakima at Terrace Hts. Rd. at odorizer. Reviewed chart & determined OP 64psig and 62psig. Regs had oil and cleaned. Requested Annual maintenance record just prior to incident. See #151 for R-1 detail. SS: CNG does not have a procedure for setting chart boxes or identifying multiplier factor of gauges. <u>PV plan and procedures.</u>		x		
20.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
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 failure analysis of any incident or hazardous condition due to construction defects or material failure CNG include in annual report – more detail in above requested for inclusion in report. CNG completes Defective/Unacceptable material reports – process flow is: completed in field, sent to admin svcs for review and sent to engineering if in ground. Engineering reviews for systemic issues – and don't just assume isolated incident even if only once occurrence. Reviewed some 2010 defect reports.	x			
35.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 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; 2008: Yakima=4317 /SS=1509 Reviewed 2008 report for all and obtained 2009 report data received in 2010. 2009: Yakima=2877 SS=1320	x			
39.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and 2008: 40=Y SS=15 2009: 20=Y SS=5	x			

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40.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; 2008: 1=Y ; SS=0 2009 Y=1 SS=0 (B) Failure to use reasonable care; 2008: 17=Y; SS=7 2009 Y=8 SS=1 (C) Excavated prior to a locate being conducted; or 2008: 1=Y; SS=0 2009 Y=0 SS=0 (D) Excavator failed to call for locate. 2008: 20=Y; SS=8 2009 Y=11 SS=3				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. Reviewed 2010 defect/failure reports that are incorporated into report.				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 (8) Each gas pipeline company must file with the commission, and with appropriate officials of all municipalities where gas pipeline companies have facilities, the names, addresses, and telephone numbers of the responsible officials of the gas pipeline company who may be contacted in the event of an emergency. In the event of any changes in such personnel, the gas pipeline company must immediately notify the commission and municipalities. Commission rec'd 06.15.10 Appropriate officials/municipalities, etc. Reviewed for 2009. Recompiled and updates provided to municipalities and commission – Public official redo in November 2010 and excavators in December 2010 – so not completed yet. August 2010 emergency call list replaces June 2010 list. Providing copy of booklet.				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 Recert on 03.11.10 by Dave Goodin.				x			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION		S	U	N/A	N/C				
45.	192.16 AOC	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator 650 E. Allen Rd., Sunnyside 220 Toppensish Ave., Toppenish 501 S. Simcoe, Sunnyside Tina will provide documentation showing customer notification. Did not provide of notification that info sent.					x		
46.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?				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?				x			
48.	192.383	If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate?) Reporting. Each operator must, on an annual basis, report the number of EFVs installed pursuant to this section as part of the annual report required by § 191.11. CNG will place in 2010 annual report. Not a requirement for 2009.				x			

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Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
49.	480-93-013	OQ records for personnel performing New Construction covered tasks. Tentative transition plan from Energy World to MEA in January 2011. Reviewed Ben Baumgarten OQ records; Conrad Castro Jr., & Tim Ramos. Monthly safety meetings identify expiration dates coming up and recert requirements. Records are kept in 3 different dbases but are being combined into one in January=MEA	x			
50.	192.225	Test Results to Qualify Welding Procedures	x			
51.	192.227	Welder Qualification	x			
52.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) API 1104 do not use Appendix C	x			
53.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	x			
54.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	x			
55.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) No track just test every 4 months.	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
56.	480-93-115(2) PV	<p>Test leads on casings (without vents) installed after 9/05/1992 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. Not able to verify whether any installed after 1992 and installing test leads on casings because there aren't any test leads at 18th and Mead & Ahtanum and Main in Union Gap WO prepped now and will do work in October.</p> <p><u>Yakima:</u> 2010: W. Washington Ave. @ B.N.RR with read more negative than -0.73 and not Tinker-Razor when recorded casing read more negative than -0.73. No remediation records. Casing = -0.883 Carrier=-1.140 2010: 14 E. Washington Ave., Yakima – <u>did not follow procedures</u> and complete Tinker-Razor when recorded casing read (pipe to soil potential) read more negative than -0.73. Copy in folder. No remediation records. Casing=-1.036 Carrier=-1.242 2009: W. Washington Ave. @ B.N.RR with read more negative than -0.73 and no Tinker-Razor read. Read of casing is -0.917 and carrier is -1.036. No remediation records. Read form indicates that this casing is full of water & WILL be blown out & rechecked – no WO identifying remediation complete. Copy in folder. 04.19.10 18th & Mead, Union Gap — working with the city to remediate – WO 25963. <u>SS:</u> Annual casing survey report summary dated 03.29.10 (inspection of 50 casings shows 0 casings shorted: But S. 11th St. S of Yakima Valley Hwy, Sunnyside shows casing read -0.809 carrier read -0.969 (>-0.73 casing read) without a tinker razor being performed. Also reported the same way in their Summary. Annual casing survey report dated XXX shows casing shorted but no reads were taken at XXX. They identified they did a leak survey but do not identify the equipment used to perform the leak survey – no WO identified either. Annual casing survey report dated 05.30.08 at “btwn 1st Ave. & Railroad St. E. of 7th, Zillah” no vent</p> <p>PATTI Typing spread sheet on these. CNG procedures CP 755 identify that a casing read should be taken but if no vent/test leads take carrier read then Tinker Razor – if Fail then leak survey. On 09.15.10 Mapping identified that when they print district maps in a batch only the top city of the maps in the batch are dated. I identified that all construction documents (incl. maps) are to be updated within 6 months of completion of new construction.</p> <p>Copies of CP 755 and 2007-2010 in folder</p>		x		
57.	480-93-115(3)	<p>Sealing ends of casings or conduits on transmission lines and mains - One installed in August 5, 2010, Fruitvale. Installed foam – this is truck stock material – and is not documented on construction records – GM identified foam installed. They also do not identify conduit in construction records regarding PE conduit or record the install of it. <u>SS:</u> Reviewed construction documentation</p>	x			
58.	480-93-115(4)	<p>Sealing ends (nearest building wall) of casings or conduits on services this is a procedure but foaming is not documented on construction form because item is truck stock.</p>	x			
59.	192.241(a)	Visual Weld Inspector Training/Experience	x			
60.	192.243(b)(2)	Nondestructive Technician Qualification Requested NDT requirements these technicians must meet. CP 760.142	x			
61.	192.243(c)	NDT procedures	x			
62.	192.243(f)	Total Number of Girth Welds None	x			
63.	192.243(f)	Number of Welds Inspected by NDT	x			
64.	192.243(f)	Number of Welds Rejected	x			
65.	192.243(f)	Disposition of each Weld Rejected	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
66.	192.303	Construction Specifications	x			
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 45 days prior to construction or replacement of transmission pipelines ≥ 100 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: None	x			
71.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; None	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. None – new 250 line proposed for fall install but 250psig or less = high pressure distribution	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 None	x			
74.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; None	x			
75.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. None	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; None	x			
77.	480-93-160(2)(g)	Welding specifications; and None	x			
78.	480-93-160(2)(h)	Bending procedures to be followed if needed. None	x			
79.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress $\geq 20\%$ SMYS? None	x			
80.	480-93-170(7) PV for Plan/Proc.	<p>Pressure tests records at a minimum include required information listed under 480-93-170(a-h)</p> <p>(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>Reviewed construction records for: Valley Mall Blvd. & S. Rudkin Rd. , Union Gap - 2" MAOP 2010 Charron & Rivard, Moxee 4" HP 250psig 2010 S. Wenas from 1st to 3rd, Selah 2" 60 MAOP 2010 Natches, Selah – 6" 60psig MAOP 2009</p> <p>Yakima: 1. Test duration for 208' 2" WSC installed at Valley Mall Blvd & S. Rudkin Rd., Union Gap in 2010 too short – duration should've been 1 hr. – test was 30 min. This test was short by 30 minutes per CNG procedures for main over 200'.</p>		x		
81.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? None.	x			

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82.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Reviewed 2007-2010 for dial gauges and pressure chart boxes. Requested calibration for Division Chart Boxes. PROVIDE ME WITH COPY OF CHART FROM 820PSIG TEST REVIEWED YESTERDAY for Moxee main. Explain the variation from static read during test time. No SN for chart box used. CNG will provide SN's for all District Chart boxes.	x			
83.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig None All were replaced and abandoned in place 4" capped and 2" foamed sealed.	x			
84.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig None	x			

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
85.	192.517(a) PV procedures	Pressure Testing (operates at or above 100 psig) – useful life of pipeline (a) Each operator shall make, and retain for the useful life of the pipeline, a record of each test performed under §§ 192.505 and 192.507. The record must contain at least the following information: (1) The operator's name, the name of the operator's employee responsible for making the test, and the name of any test company used. (2) Test medium used. (3) Test pressure. (4) Test duration. (5) Pressure recording charts, or other record of pressure readings. (6) Elevation variations, whenever significant for the particular test. (7) Leaks and failures noted and their disposition. SS: WO 163157 Granger river Bore – 4". The test results do not include an explanation for 5psig loss of pressure. Division Test Data Report includes lines for pressure tester to include ambient temps test on and test off but these were not filled in. (Tester did indicate 705psig rising) CNG did not document thermal effects (absolute temp 460+60) and is unable to show the test on this pipe to be acceptable. Ambient temps do not wholly identify effect on pipe.		x		
86.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	x			
87.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09 Steph: See advisory bulletin/email attached to OQ Form for details. Per Dave Lykken: <i>Bottom line, it is PHMSA's position that while the O&M rule does not specifically require the OQ plan to be part of the operators O&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> CNG updated their OQ interval requirements from Energyworld to MEA. <u>Several intervals have changed</u> – proposed transition to begin January 1, 2011.	x			

**Utilities and Transportation Commission
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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
88.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	x			
89.	480-93-018(3) PV	Records, including maps and drawings updated within 6 months of completion of construction activity? Yakima: No. Include documents. 1. Abandonment for 1043 Desmarais Rd., Yakima – copy in folder 2. Abandonment of R-13 from Bell Rd. & Ganache. – constr. Records (maps) not updated. (CNG updated maps on 08.31.10) Copy in folder. SS: 1. 2340 Scoon Rd., Sunnyside new constr. Completed 12.08.09 not mapped as of 09.15.10 – In folder. 2. WO 165834, Zillah constr. Completed 12.02.09 not mapped until 08.08.10		x		
90.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures Reg maint, valve maint., construction inspection, new change to the leak survey procedure. Reviewed constr. Inspections for 2009. Reviewed constr. Inspection lists. – In folder.	x			
91.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures (4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found. Deficiencies to abnormal operations identified in patrolling, leak surveys, etc. –	x			
92.	192.609	Class Location Study (If applicable) System is designed to class 4 requirements at this time with plans to classify pipe.	x			
93.		Damage Prevention (Operator Internal Performance Measures)				
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.		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 procedures for compliance with state law and regulations.	x			
99.	192.614	Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Reviewed last two weeks of diggers tickets for May 2010.	x			
100.		Are locating and excavating personnel properly qualified 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? Jeff identified a location where they dug up and relocated a casing vent due to contractor digging in area. Reviewed locate tickets that identify contractor calling in locate but digging before they arrive – Jeff said once his crews identify happening several times he calls the outfit and identifies issues including billing them for damage or having to dig to determine damage.	x			
102.		Informational purposes only, Not Required. Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do Y N x	x			

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Records Review and Field Inspection**

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Comments:

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) Note: Review operator records of previous accidents and failures including third-party damage and leak response Reviewed 3 rd party damage and leak reports: for 2010. Also reviewed new forms.	x			
105.	192.615(b)(1) AOC	Location Specific Emergency Plan Reviewed CP's and they identify that the field personnel are to reference the Emergency Plan when they do not have the plan available to them such as in CP 720.		x		
106.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training Planning a table top emergency exercize with emergency responders for Sunnyside and Yakima in November 2011. Copy in file.	x			
107.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. They do review the completed forms and discuss post emergency. GM also responds to incidents to verify following of procedures. Also OQ completed and training associated. They discuss during safety meetings.	x			
108.	192.615(c)	Liaison Program with Public Officials Received a copy of Agency phone number and contacts of fire police sheriif, etc. Merged with Williams to do Fire Depts. Identified they complete annually. Keith identified that this liason requirement is above their minimum requirement is.	x			
109.	192.616	Public Awareness Program				
110.	192.616(e&f) AOC	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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113.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	Annual – bi-annual bill stuffers. Newspaper ads No Ad documentation for 2008-to Sept. 2010 per plan & procedures.				
		LDC Customers	Twice annually receive in six separate bill stuffer mailings				
		One-Call Centers	As required of One-Call Center CNG identified same one-call center that serves ML/Wenatchee – reviewed in Wenatchee.				
		Emergency Officials	Annual Reviewed mailing info & postage bill sent 12.07.2009 incl 21,916 pieces of mail to 472 emergency officials				
		Public Officials	3 years 2009 incl. 1059 pub. Off.				
		Excavator and Contractors	Annual Sent 2009 to 11024 ex. & contr.				
		Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	2 years No trans.				
		One-Call Centers	As required of One-Call Center No trans.				
		Emergency Officials	Annual No trans.				
		Public Officials	3 years No trans.				
		Excavator and Contractors	Annual Not trans.				
	114.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.				
115.	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. Spanish		x			
116.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 . .616(h) Reviewed this report which includes summary data– Dated: 06.04.10		x			
117.	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. 2009 Firing/training Center for US Army was a master meter until 2009. Per Keith: they received the same thing every other customer received.		x			
118.	192.617	Review operator records of 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		x			

Comments:

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
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119.	192.619/621/623	<p>Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08) Don't use.</p>	x			
120.	480-93-015(1)	<p>Odorization of Gas – Concentrations adequate?</p> <p>GM identified annual review of locations for system growth and increased gas usage – to be discussed with engineering for future standard. Right now testing locations based upon distance from odorizer. Mentioned to GM that other issues take into consideration such as usage along w/distance (not inclusive to only these issues.)</p>	x			
121.	480-93-015(2)	<p>Monthly Odorant Sniff Testing</p> <ol style="list-style-type: none"> 1. O-01 Moxee Beauche Rd./Williams Annual maint.08.17.10 09.14.09, 11.03.08: 4 sniff test locations 2. O-02 Yakima 7 sniff test locations 3. O-03 Selah 2 sniff test locations 4. O-04 Selah 4 sniff test locations. 	x			
122.	480-93-015(3)	<p>Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements</p>	x			
123.	480-93-015(4) AOC	<p>Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) CNG did not follow their calibration procedures by comp: 10.21.09 Heath Odorator SN#705637 – calibration record not completed per CNG CP identifying the condition of the instrument satisfactory/unsatisfactory. Copy in folder. List calibration record issue Sunnyside where instrument SN not listed.</p>		x		
124.	480-93-124(3) PV	<p>Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) In 2007 PV for CNG did not have bridge markers on the bridge going into the Yakima County Club Golf Course. CNG did not translate this to look for marker discrepancies elsewhere: LIST SPAN AREAS W/O MARKERS FROM PREFIELD</p>		x		

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125.	480-93-124(4) PV Records	<p>Markers reported missing or damaged replaced within 45 days? CP 610.043 Quarterly report. Due to bridge project: 01.13.10 1st quarterly patrol at Pioneer @ Wide Hollow Creek – markers ID'd as missing. Due to bridge project 04.09.10 2nd quarterly patrol at Pioneer @ Wide Creek – markers ID'd as good 07.07.10 3rd quarterly patrol at Pioneer @ Wide Creek – marker missing. WO #3562211756 replaced markers. Requested to review WO. Okay – markers installed 07.22.10 where they installed markers both sides of xing. A. Patti prefield inspection where no markers on Fraley South of I-82 . 1. Per CNG - Marker maps were prepared for Yakima/Sunnyside prior to the placement of markers. CNG does not have documentation of installation/placement of these markers. B. System surveillance record for Grandview 1. 1st quarterly patrol dated 03.19.08 marker/vent marker as damaged at E. Lincoln Ave. & Yakima Valley HWY RR xing 2. 2nd quarterly patrol dated 06.18.08 marker/vent marker as damaged at E. Lincoln Ave. & Yakima Valley HWY RR xing <u>STILL NOT REPAIRED</u> 3. 3rd quarterly patrol dated 09.15.08 marker/vent marker as damaged at N. Birch St. N of Wine country Rd. 4. 1ST quarterly patrol dated 04.06.09 marker/vent marker as damaged at N. Birch St. N of Wine Country Rd. <u>STILL NOT REPAIRED</u> C. System surveillance record for Granger: 1. 1st quarterly patrol dated 04.06.09 marker/vent marker as missing at Bridge Ave @ Yakima River 2. 4th quarterly patrol dated 12.09.09 marker vent marker as missing at Bridge Ave @ Yakima River <u>STILL NOT REPLACED</u> D. System surveillance record for Granger: 1. 2nd quarterly patrol dated 04.07.10 marker/vent marker as missing at 2nd St East of Ave "G"; Ave "B" N. of Main St.; N. Birch St. N of Wine Country Road; and Ave "B" S. of 2nd St. a. No WO and patrol log does not indicate whether markers were replaced. 2. 3rd quarterly patrol dated 07.12.10 marker/vent marker as damaged at Ave "B" S. of 2nd St. a. WO # 1966293459 created 08.17.10 to repair but no documentation that this repair was completed.</p> <p>Copies in folder</p>		x		
126.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on . Reviewed March 2010 records.	x			
127.	480-93-155(1) Multiple PV's	<p>Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? No uprates in Yakima 2007 to present. Not in Yakima District. Yes, Sunnyside has uprates. Requested records. 4" uprate from 175 psig to 250 psig Grandview on Euclid. CNG did not provide uprate procedures and specs to the UTC for uprate >60psig. Uprate docs in folder. <u>REVIEW FOR ACCURACY.</u></p>		x		
128.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? Reviewed leak records for 2008 and 2009.	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; No foreign leaks documented	x			
130.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? No foreign leaks documented.	x			
131.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair?	x			
132.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	x			

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133.	480-93-187 PV	<p>Gas leak records: at a minimum include required information listed under 480-93-187(1-13)</p> <ol style="list-style-type: none"> (1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the person conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron); (8) Pipe condition; (9) Type of repair; (10) Leak cause; (11) Date pipe installed (if known); (12) Magnitude and location of CGI readings left; and (13) Unique identification numbers (such as serial numbers) of leak detection equipment. <p>9003 Garden Ave., Yakima -- No SN for instrument used in subsequent reads, no name of employee completing reads on 08.14.09; 08.17.09; 08.18.09; 08.19.09; 08.20.09; 08.21.09; 08.24.09; 08.25.09; 08.26.09; 08.27.09; 08.28.09; 08.31.09; 09.01.09; 09.02.09; 09.03.09. Copy in folder.</p>		x		
134.	480-93-188(1) PV	<p>Gas leak surveys Requested review of leak survey records for 2009 and 2010.</p> <ol style="list-style-type: none"> 1. Business Districts/High Occupancy Areas <ol style="list-style-type: none"> a. <u>Check leak surveys include:</u> <ol style="list-style-type: none"> i. Terrace Heights Way & 15th St./17th St./18th St. ii. Businesses: Oxford Inn/Suites; Mexican Rest.; Walmart; iii. Does not include HO area of Chalmers St to 18th St. from Terrace Heights Rd. to Riverside St. which incl. W.L. Hanson Bldg. and Public Park NOT IN ANNUAL iv. University Parkway & Iron Horse Ct. (100 & 200 Blks.) <ol style="list-style-type: none"> 1. Businesses: Iron Horse Lodge; Credit Union and Pacific NW University Bldg., among others NOT ON ANNUAL v. Fair Ave. & Spruce St. <ol style="list-style-type: none"> 1. New multiplex high-rise apartment complex NOT ON ANNUAL vi. Maple St. & 9th St. <ol style="list-style-type: none"> 1. School complex OKAY 1. Underground line walk Section #2 – Leak detected 03.20.09 at 1917 S. 14th St. – Leak was not graded. Line walk personnel did not document SN for CGI equipment only FI. Reviewed – no leak. & equipment identified. 2. 404 Southern Ave/701 5th Ave., Selah line walk Section #2. Leak detected on 03.09.09 but not graded – no CGI used in line walk. Copy in folder. 3. Reviewed 2009 and 2010 Moxee HP Annual Survey (250psig) the HP survey does not include all services, services downstream of the FT and the 2009 & 2010 Section #1 and Section #2 5 yr. line walks do not show these services surveyed. Jeff identified they do not have 5 yr records (for 2004 or 2005) showing these services were leak surveyed. 4. Reviewed 2009 and 2010 Selah line annual HP leak survey records. Section 6 services downstream of the FT were not leak surveyed. Section #6 (5 yr) leak survey: <p>ALL ABOVE IN FOLDER</p>		x		
135.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X			

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136.	480-93-188(3)	<p>Leak survey frequency (Refer to Table Below) High Occupancy structures missing from annual NTE 15 mos. Missing from survey same as # 134 above:</p> <ul style="list-style-type: none"> i. Does not include HO area of Chalmers St to 18th St. from Terrace Heights Rd. to Riverside St. which incl. W.L. Hanson Bldg. and Public Park NOT IN ANNUAL ii. University Parkway & Iron Horse Ct. (100 & 200 Blks.) <ul style="list-style-type: none"> 2. Businesses: Iron Horse Lodge; Credit Union and Pacific NW University Bldg., among others NOT ON ANNUAL iii. Fair Ave. & Spruce St. <ul style="list-style-type: none"> 3. New multiplex high-rise apartment complex NOT ON ANNUAL 							x												
		Business Districts (implement by 6/02/07)	1/yr (15 months)																		
		High Occupancy Structures	Review Business Districts found in pre-field. See #134. 1/yr (15 months) HO's outside Business Distr.(see above #136. Also, Reviewed PBI (HO) and leak survey records which include: New HO's identified in 1 st quarterly patrol on 03.02.09 for 3 new business . 1 hotel, N Wenas Rd.																		
		Pipelines Operating ≥ 250 psig	1/yr (15 months) Appears okay																		
		Other Mains: Cl. WI, copper, unprotected steel	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							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 Reviewed the 04.09.10, & 07.07.10 3 rd quarter patrol identifies 2 locations to monitor for unstable soil: Yakima Selah Tie from Naches River (6" @ 50psig) and Yakima Selah Tie from Southern Ave (6" @ 50psig). Each descriptor states, "View ridge for signs of construction and earth movement". This appears to be preventative with no indications of previous earth movement issues.							x												
140.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions							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												
142.	480-93-188(5) PV	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f) Prior to 2009 records do not identify the specific areas surveyed other than a description stating the section surveyed. See 134 above.							x												
143.	480-93-188(6)	Leak program - Self Audits <i>Each gas pipeline company must maintain records of the self audits for five years. Self audits must be performed as frequently as necessary, but not to exceed three years between audits.</i>							x												
144.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .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)																			
3	4/yr (4½ months)	2/yr (7½ months)																			
4	4/yr (4½ months)	4/yr (4½ months)																			
145.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .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
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146.	192.603(b)	Patrolling Business District (4 per yr/4½ months)	x			
147.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) All completed on quarterly patrol	x			
148.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) See # 134 above for no records indicating HP services downstream of FT are surveyed.	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			
151.	192.709 PV	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 R-1 November 28, 2007, overpressure Yakima at Terrace Hts. Rd. at odorizer. Reviewed chart & determined OP 64psig and 62psig. Regs had oil and cleaned. Requested Annual maintenance record just prior to incident. R-01 15 month annual maintenance per 192.739 exceeded 17 month time frame between 09.05.08 and the last time they were there on a special but 09.08.06 was last identified as an annual maintenance record – exceeding two years. Also reported in annual report 08.30.2000; twice in 2005, and an overpressurization in 2007 due to oil migrating into system by supplier – CNG clean and repair reg but has not addressed problem by increasing inspection frequency, etc. OQ of R-01 shows oil in filter – see details in below question #152. Copies in folder. R-45 was installed 03.07.08 to cover 4 HP residential service customers whose svcs were installed in 1987. Svc card for 209 W. Charron Rd. (A). addresses are A-D. Regulator station installed in 2008 (06.17.08). Four customers recognized as main.			x	

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152.	<p>192.709 PV</p> <p>Sent email to Tina regarding these issues.</p> <p><u>REVIEW THIS CHART AT SUNNYSIDE.</u></p> <p><u>Records PV R-26</u></p>	<p>Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 <i>This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.</i></p> <p>Tina requested calculations from engineering for all owned by CNG and will provide. CP 714.04 requires the relief valve to be fully opened during annual inspection. The following are annual inspections:</p> <ol style="list-style-type: none"> R-01 06.28.10 identifies this as N/A. R- set press.=63psig. <u>Request Charts. Charts for this week (Tina emailed to me) show over-pressurization above 60psig MAOP to approx. 62psig sustained for approx. 2 days. CHECK INCIDENT REPORT LOG FOR REPORT OF OVERPRESSURIZATION.</u> This station over-pressurized in 2007 w/reason due to oil in regulator equipment. OQ at this station showed oil in filter – CNG OQ employee identified as acceptable amount of oil. Staff opinion is control lines and pilot have small openings which could potentially become blocked from oil in line and be contributing to over-pressurization. I identified that the equipment at this reg sta is designed for gas not oil. CNG identified that they would review manufacturers recommendations regarding oil in equipment. Also, each annual inspection does not identify that CNG is checking the filters ahead of each reg run: 06.28.10 states the pilot filter was not checked and indicated it was N/A; 06.09.09 checked the pilot filter and found it okay; 07.28.08 states the pilot filter was not checked and indicated it was N/A. I identified that since they had an over-pressurization in 2007 that they should be checking filter each annual or even more frequently, if necessary. Again, the 06.28.10 annual they did not check the pilot filters. R-02 02.09.09 identifies this as N/A with no R set press. 01.30.10 R set press=63psig. <u>02.27.09 Relief replaced w/Mooney due to parts issue on Grove relief – full open done at this time on special/rebuild.</u> R03 07.29.10 R set press = 63psig R-05 07.27.10 does not include R info or set press info. 07.13.09 R set press=63psig –PROCEDURES ISSUE. R-10 retired 11.21.08 R-11 retired 11.30.07 R-12 R set press=63psig R-13 02.03.10 does not identify whether opens full. PROCEDURES ISSUE R-14 retired 03.03.09 R-15 retired 03.10.05 R-16 02.03.10 does not identify whether opens full. PROCEDURES ISSUE R-18 retired 09.29.09 R-19 02.26.08 does not identify whether opens full. PROCEDURES ISSUE R-22 02.03.10 does not identify whether opens full PROCEDURES ISSUE R-24 02.02.10 does not identify whether opens full PROCEDURES ISSUE R-38 R set press=63psig R-43 R set press=65psig <p>GM identified that the employees subsequently informed him (result of a staff question during this inspection) they did check fully open relief but did not identify this on the annual forms. Records do not identify that full open check was completed only that they checked the set point. CNG argued that they did the work and that this is only a records issue because the employees said they did the work but did not write it down. – An agree to disagree issue. <u>Staff identifying this as a procedures issue and R-01 gate station/system may not have been designed or adjusted to meet the particular conditions of service in accordance with CFR 192.203(b) due to oil issue and overpressurization issues.</u></p> <p>SS:</p> <ol style="list-style-type: none"> R-26 explanation for Reg Sta spring ranges of regs and reliefs being emailed to me by Tina from CNG engineering. 				
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	x			

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

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155.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) Reviewed Yakima SLV list: - okay Sunnyside: CNG did not grandfather any valves in because it was not their practice to install valves away from meter. Sunnyside installed a valve to mini mall in Grandview on 1" line. Does not have valve number yet. Jeff identified that this should not have a SLV so he had it removed.	x			
156.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 none.	x			
157.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following: (a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided. (b) Gas or electric welding or cutting may not be performed on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work. (c) Post warning signs, where appropriate.	x			
158.	192.603(b)	Welding – Procedure 192.225(b) No changes	x			
159.	192.603(b)	Welding – Welder Qualification 192.227/.229 No changes.	x			
160.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) No employees but have procedures.	x			
161.	192.709	NDT Records (pipeline life) .243(f) No new	x			
162.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	x			
163.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) N/A	x			

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
164.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	x			
165.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)	x			
166.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	x			
167.	192.491	Maps or Records .491(a) Reviewed 2 galvanic systems in Yakima – monitored every two months – reviewed 2008-2010	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 (1 per yr/15 months) .465(a)	x			
171.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	x			
172.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c)	x			
173.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c)	x			

**Utilities and Transportation Commission
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CORROSION CONTROL RECORDS			S	U	N/A	N/C
174.	480-93-110(2) PV	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) 1. Low CP read at 618 N. 20 th Ave., Yakima on 07.20.09 – No follow up remediation to low read of -0.675. Copy in folder. 2. 16 th Ave. & Nob Hill (Yakima Valley Community College) Low read of .783 reported. No remediation of low read. Copy in folder. 3. Low CP read -0.794 & -0.833 at Meter 598919 – 311 S. Wapato Ave, Wapato - near 3 rd & Wapato – CNG identified their read acceptable per WO 6167510171. 4. Low CP read -0.533 meter #159559 – 109 S. Wapato Ave., Wapato - CNG found low read also but identified after wrapping interface read was Okay: <u>svc mech did not record read taken upon arrival and no explanation provided.</u> Requested CP for remediation of low reads. None provided other than rectifier potential brought up. Applicable CP 755.064 states they are required to complete CNG for 650 and per Keith – the specific location identified as low must specifically be followed up on. SS: Pattie typed – Several locations no reads taken. One location is a failure with no remediation		x		
175.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation. Reviewed Fluke/1/2 cell and Voltmeter calibrations for 2008-2010	x			
176.	192.491	Unprotected Pipeline Surveys. CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) None	x			
177.	192.491	Electrical Isolation (Including Casings) .467 2009 casing survey reports 119 casings monitored with zero shorts. Copy of casing #41 report stating full of water Y will be blown out & rechecked in folder – read shows -0.917 carrier -1.036 with no Tinker-Rasor follow-up per CNG procedures. 2010 issues with this also.		x		
178.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months Multiple casings not included in annual inspection. 14 found just in Terrace Heights Rd., Yakima area. Copy of Butterfield & Terrace Heights CAD/grid/HP map in folder. Includes no Tinker Rasor completed per CNG CP's for several locations.		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 90 days At 1742 followup okay.	x			
181.	480-93-110(5)(c)	Casing shorts cleared when practical One location CNG working on right now digging RR xing & Washington. Union Gap due to casing filling with water 2 years in a row (they would blow out annually to clear) – identified they are required to dig and seal in this situation – a WO was created.	x			
182.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months	x			
183.	192.491	Interference Currents .473	x			
184.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) None	x			
185.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	x			
186.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477	x			

**Utilities and Transportation Commission
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CORROSION CONTROL RECORDS			S	U	N/A	N/C
187.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 A. CNG 2007 Inspection stated: " Finding e: On Facility Maintenance and Inspection Record for R 19, the pipe was on the ground and the flange was partially buried. CNG's form was not adequately filled out and CNG did not prove that a corrosive condition did not exist at the time of the 3-5-07 inspection." 1. Field inspection shows that the above conditions still exist during site visit 09.15.10 and have not been remedied. 2. This was remedied immediately after inspection.	x			
188.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	x			

Comments:

Check the following From PV's in 2007 inspection:

PV 7. from question 137 49 CFR Part 192.491 (c)

(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§192.465(a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.

Finding a

In Sunnyside, CNG did not produce the 2005 individual atmospheric corrosion inspection worksheets.

Finding b

The Yakima Quarterly Patrol Log dated 6-1-2007 noted that at the Yakima Selah tie from Southern Ave needed paint and possible wrap. CNG did not provide a work order to document that the Selah tie had been painted and or wrapped.

Finding c

- For R19, located at Cheyne Road. (Sunnyside?), North of highland Dr, the Facility Maintenance and Inspection Record dated 2-23-07 has a written comment that "Relief valve's piping above relief isolation valve needs to be painted". CNG did not provide a work order to perform this work.

Finding d

On Facility Maintenance and Inspection Record for R25 located at Roy farms dated 3-5-07 the miscellaneous portion of the form was not filled out. The miscellaneous portion of the form indicates if the paint and grounds are in good condition.

Finding e

- On Facility Maintenance and Inspection Record for R 19, the pipe was on the ground and the flange was partially buried. CNG's form was not adequately filled out and CNG did not prove that a corrosive condition did not exist at the time of the 3-5-07 inspection.

PV 8. from question 137 WAC 480-93-110 (9)

(9) Each operator must have a written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action.

Finding

In Sunnyside, for the 2004, 2005 and 2006 atmospheric corrosion inspections, CNG did not produce documentation for completing remedial action

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
189.	192.161	Supports and anchors Meter #571993 – House piping providing support & weight is tipping meter. Discussed w/CNG		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 1. No name, <u>no equipment SN</u> : Low CP read investigation form: N. 32 nd & Fruitvale, Yakima 04.19.10 (31 days after low read taken) 2. No name/ no date of investigation/ <u>no equipment SN</u> : Moxee gate station Low CP read investigation form 3. No name/ <u>no equipment SN</u> : 13 th & St. – Low read investigation form	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	x			

Utilities and Transportation Commission
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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		followed.				
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? <i>(4) Each gas pipeline company must record and maintain records of the actual value of any required reads, tests, surveys or inspections performed. The records must include the name of the person who performed the work and the date the work was performed.</i> Name of person taking casing reads prior to Greg Miller Corrosion Technologist review not included on system surveillance records for casing surveys: 4. No name, no equipment SN: Low CP read investigation form: N. 32 nd & Fruitvale, Yakima 04.19.10 (31 days after low read taken) 5. No name/ no date of investigation/no equipment SN: Moxee gate station Low CP read investigation form 6. No name/no equipment SN: 13 th & St. – Low read investigation form	x			
197.	192.179	Valve Protection from Tampering or Damage	x			
198.	192.455	Pipeline coatings meet requirements of 192.461 <i>(for buried pipelines installed after 7/31/71)</i>	x			
199.	192.463	Levels of cathodic protection	x			
200.	192.465	Rectifiers	x			
201.	192.467	CP - Electrical Isolation See #178 above for casing issues. See #178.		x		
202.	192.476	Systems designed to reduce internal corrosion	x			
203.	192.479	Pipeline Components exposed to the atmosphere Potential Interface issues per 192.479(c): 1. R12, at N Rivard Rd and E Charron Rdl, Moxee Potential Coating issues per 192.479(a & b): 1. 7525 Postma, Moxee 2. R-25 Roy Farms, Moxee 3. FT across from 1650 Charron, Moxee	x			
204.	192.481	Atmospheric Corrosion: monitoring	x			
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? None since 2007	x			
208.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? GM identified sealed with foam from truck stock	x			
209.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted See above PV re: emergency manual referenced in O&M but these are not available in field.		x		
210.	192.605	Knowledge of Operating Personnel	x			
211.	480-93-124	Pipeline markers CNG has developed a quarterly patrol pipeline marker check form identifying the exact locations of markers – a good start. See marker PV's above				
212.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days ? No. missing markers at Pioneer Ave & Wide Hollow Creek identified as missing on 04.07.10. A WO # 3562211756 was generated to replace missing markers on 07.07.10 and markers were replaced on 07.22.10. There are reported and damage/missing that have not been replaced – they are identified in an above ma 45 day marker above.	x			
213.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	x			
214.	192.195	Overpressure protection designed and installed where required?	x			
215.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities) See above for R-01 details.		x		

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
216.	192.741	Telemetry, Recording Gauges	x			
217.	192.751	Warning Signs noted in above		x		
218.	192.355	Customer meters and regulators. Protection from damage	x			
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?	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? Yes No x				
225.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?	x			
226.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?	x			
227.	192.745	Valve Maintenance (Transmission)	x			
228.	192.747	Valve Maintenance (Distribution)	x			

Facility Sites Visited:

Facility Type	Facility ID Number	Location

Comments:

- A. 480-93-180 Horizontal orientation of regulator vents – CNG Plans & Procedures require them to be installed in a vertical orientation.
1. 1010 East A, Yakima – Cedars Inn & Suites - Meter # 693410
 2. 1001 East A, Yakima – Holiday Inn Express – Meter # 591382
 3. Postma Rd., Moxee - Farwest Fabricators Inc. - Meter #591048 TC
 4. 1014 Chestnut St., Yakima – No meter
 5. 621 Butterfield, Yakima
 6. 1206 N. 40th Ave., Yakima Meter # 248578
 7. R-41
 8. 309 Charron, Moxee
 9. 314 Charron, Moxee

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

<u>Number</u>	<u>Date</u>	<u>Subject</u>
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
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		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C	
229.	.605(b) NO COMPRESSOR STATIONS THIS DISTRICT	COMPRESSOR STATION PROCEDURES					
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 (1 per yr/15 months), prompt repair or replacement			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 NFPA #30			X		
235.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			X		
236.		• 50% of the upright side areas are permanently open, or			X		
237.	• It is an unattended field compressor station of 1000 hp or less			X			

Comments:
NO COMPRESSOR STATIONS THIS DISTRICT

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

Comments:
NO COMPRESSOR STATIONS THIS DISTRICT

		COMPRESSOR STATIONS INSPECTION (Field)	S	U	N/A	N/C
		(Note: Facilities may be "Grandfathered")				
241.	.163 NO COMPRESSOR STATIONS THIS DISTRICT	(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	

Attachment 1

Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
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 National Electric Code, ANSI/NFPA 70? NO COMPRESSOR STATIONS THIS DISTRICT			X	
248.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
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			X	
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 I, 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	

Attachment 1

Distribution Operator Compressor Station Inspection

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

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
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	
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 THIS DISTRICT