

**US Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
Office of Pipeline Safety**

**Gas IMP Field Verification Inspection  
49 CFR Subparts 192.911, 192.921, 192.933, & 192.935**

**General Notes:**

1. This Field Verification Inspection is performed on field activities being performed by an Operator in support of their Integrity Management Program (IMP).
2. This is a two part inspection form:
  - i. A review of applicable Operations and Maintenance (O&M) and IMP processes and procedures applicable to the field activity being inspected to ensure the operator is implementing their O&M and IMP Manuals in a consistent manner.
  - ii. A Field Verification Inspection to determine that activities on the pipeline and facilities are being performed in accordance with written procedures or guidance.
3. Not all parts of this form may be applicable to a specific Field Verification Inspection, and only those applicable portions of this form need to be completed. The applicable portions are identified in the Table below by a check mark. Only those sections of the form marked immediately below need to be documented as either "Satisfactory"; "Unsatisfactory"; or Not Checked ("N/C"). Those sections not marked below may be left blank.

Operator Inspected: **Northwest Natural Company**

Op ID: **13840**

Perform Activity (denoted by mark)	Activity Number	Activity Description
	1A	In-Line Inspection
	1B	Hydrostatic Pressure Testing
	1C	Direct Assessment Technologies
	1D	Other Assessment Technologies
	2A	Remedial Actions
	2B	Remediation – Implementation
	3A	Preventive & Mitigative – additional measures evaluated for HCAs
	3B	Preventive & Mitigative – automatic shut-off valves
	4A	Field Inspection for Verification of HCA Locations
	4B	Field Inspection for Verification of Anomaly Digs
<b>X</b>	4C	Field Inspection to Verify adequacy of the Cathodic Protection System
<b>X</b>	4D	Field inspection for general system characteristics
	attachment	Anomaly Evaluation Report
	attachment	Anomaly Repair Report

## Gas IMP Field Verification Inspection Form

Name of Operator:

---

**Headquarters Address:**

220 Northwest Second Avenue  
 One Pacific Square  
 Portland, Oregon 97209

**Company Official:** Darlene Maurer, Pipeline Safety Compliance Specialist

**Phone Number:** 503-226-4211 ext. 4391

**Fax Number:**

**Operator ID:** 13840

Persons Interviewed	Title	Phone No.	E-Mail
<b>Darlene T. Maurer</b> (Primary Contact)	<b>Pipeline Safety Code Compliance Engineering Services</b>	503-226-4211 Ext 4391	darlene.maurer@ nwnatural.com
Russell Grable	Construction 3 (Field Valve Inspection)		
Johnny Jones	Construction 2 (Field Valve Inspection)		
Erik Carter	Construction 2 (Field Valve Inspection)		
David Maynard	Compliance 2 (Field CP Inspection)		
Linda Butterfield	System Ops 2 (Field Regulator Inspection)		
Jack Ledgerwood	System Ops 1 (Field Regulator Inspection)		
Vance Jones	Customer Field Service 4 (field Odorant Inspection)		

**OPS/State Representative(s):** Al Jones / UTC Washington **Date(s) of Inspection:** June 14-18, 2010

**Inspector Signature:** Al Jones

**Date:** June 23, 2010

**Pipeline Segment Descriptions:** *[note: Description of the Pipeline Segment Inspected as part of this field verification. (If information is available, include the pipe size, wall thickness, grade, seam type, coating type, length, normal operating pressure, MAOP, %SMYS, HCA locations, class locations, and Pipeline Segment boundaries.)]*

**Site Location of field activities:** *[note: Describe the portion of the pipeline segment reviewed during the field verification, i.e. milepost/stations/valves/pipe-to-soil readings/river crossings/etc. In addition, a brief description and case number of the follow up items in any PHMSA compliance action or consent agreement that required field verification. Note: Complete pages 8 & 9 as appropriate.]*

**Summary:**

Northwest Natural employee's Covered Qualification cards were reviewed.  
 Field inspection for Clark County, Washington included the Cities of Vancouver, Camas, and Washougal.

**Findings:**

Employees understanding of covered task and AOC were verified.

**Key Documents Reviewed:**

Document Title	Document No.	Rev. No	Date
Northwest Natural Employee Qualification Cards	19 pages		Varies

**Part 1 - Performance of Integrity Assessments**

<b>1A. In-Line Inspection</b>	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify that Operator's O&amp;M and IMP procedural requirements (e.g. launching/receiving tools) for performance of ILI were followed.</b>			X	[Note: Add location specific information, as appropriate.]
Verify Operator's ILI procedural requirements were followed (e.g. operation of trap for launching and receiving of pig, operational control of flow), as appropriate.				
Verify ILI tool systems and calibration checks before run were performed to ensure tool was operating correctly prior to assessment being performed, as appropriate.				
Verify ILI complied with Operator's procedural requirements for performance of a successful assessment (e.g. speed of travel within limits, adequate transducer coverage), as appropriate.				
Document ILI Tool Vendor and Tool type (e.g. MFL, Deformation). Document other pertinent information about Vendor and Tool, as appropriate				
Verify that Operator's personnel have access to applicable procedures for preparing, running and monitoring the pipeline for ILI tools include performance requirements (e.g.: tool speeds, pipe cleanliness, operation of tool sensors, and ILI field calibration requirements), as appropriate.				
Other:				
<b>1B. Hydrostatic Pressure Testing</b>	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify that hydrostatic pressure tests complied with Part 192 Subpart J requirements.</b>			X	
Review documentation of Hydrostatic Pressure Test parameters and results. Verify test was performed without leakage and in compliance with Part 192 Subpart J requirements.				
Review test procedures and records and verify test acceptability and validity.				
Review determination of the cause of hydrostatic test failures, as appropriate.				
Document Hydrostatic Pressure Test Vendor and equipment used, as appropriate.				
Verify that the baseline assessment is conducted in a manner that minimizes environmental and safety risks (reference §192.919(e) and ADB-04-01)				
Other:				
<b>1C. Direct Assessment Technologies</b>	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify that application of "Direct Assessment Technology" complied with Part 192.923</b>			X	
Review documentation of Operator's application of "Direct Assessment Technology", if available. Verify compliance with Part 192.923 and Operator's procedural requirements, as applicable.				
Verify that appropriate tests and/or inspections are being performed and appropriate data is being collected, as appropriate.				
Other:				
<b>1D. Other Assessment Technologies</b>	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify that application of "Other Assessment Technology" complied with Operator's requirements, that appropriate notifications had been submitted to PHMSA, and that appropriate data was collected.</b>			X	
Review documentation of notification to PHMSA of Operator's application of "Other Assessment Technology", if available. Verify compliance with Operator's procedural requirements. If documentation of notification to PHMSA of Operator's application of "Other Assessment Technology" is available, verify performance of assessment within parameters originally submitted to PHMSA.				
Verify that appropriate tests are being performed and appropriate data is being collected, as appropriate.				
Other:				

**Part 2 - Remediation of Anomalies**

2A. Remedial Actions – Process	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify that remedial actions complied with the Operator’s procedural requirements.</b>			<b>X</b>	<p>Cathodic Protection readings of pipe to soil at dig site (if available):            On Potential: _____ mV            Off Potential: _____ mV</p> <p><i>[Note: Add location specific information and note whether CP readings were from the surface or from the pipe following exposure, as appropriate.]</i></p>
Witness anomaly remediation and verify documentation of remediation (e.g. Exposed Pipe Reports, Maintenance Report, any Data Acquisition Forms). Verify compliance with Operator’s O&M Manual and Part 192 requirements.				
Verify that Operator’s procedures were followed in locating and exposing the anomaly (e.g. any required pressure reductions, line location, identifying approximate location of anomaly for excavation, excavation, coating removal).				
Verify that procedures were followed in measuring the anomaly, determining the severity of the anomaly, and determining remaining strength of the pipe. Review the class location factor and failure pressure ratio used by Operator in determining repair of anomaly.				
Verify that Operator’s personnel have access to and knowledge of applicable procedures.				
Other:				
2B. Remediation - Implementation	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify that the operator has adequately implemented its remediation process and procedures to effectively remediate conditions identified through integrity assessments or information analysis.</b>			<b>X</b>	<p>Cathodic Protection readings of pipe to soil at dig site (if available):            On Potential: _____ mV            Off Potential: _____ mV</p> <p><i>[Note: Add location specific information and note whether CP readings were from the surface or from the pipe following exposure, as appropriate.]</i></p>
If documentation is available, verify that repairs were completed in accordance with the operator’s prioritized schedule and within the time frames allowed in §192.933(d).				
Review any documentation for this inspection site for an immediate repair condition (§192.933(d)(1)) where operating pressure was reduced or the pipeline was shutdown. Verify for an immediate repair condition that temporary operating pressure was determined in accordance with the requirements in §192.933(a) or, if not applicable, the operator should provide an engineering basis justifying the amount of pressure reduction.				
Verify that repairs were performed in accordance with §192.103, §192.111, §192.713, §192.717, §192.719, §192.933 and the Operator’s O&M Manual, as appropriate. If welding is performed, verify a qualified welding procedure and qualified welders are used to perform repairs. If composite repair methods are used, verify that a method approved by the Operator is used, procedures are followed, and qualified personnel perform the repair.				
Review CP readings at anomaly dig site, if possible. (See Part 4 of this form – “Field Inspection to Verify adequacy of the Cathodic Protection System”, as appropriate.				
Other:				

**Part 3 - Preventive and Mitigative Actions**

3A. P&M Measures for Third Party Damage	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Identify additional measures evaluated for the HCA section of the pipeline and facilities.</b>			<b>X</b>	
Verify that P & M measures regarding threats due to third party damage are being implemented: [§192.915(c), §192.935(b)(1)(iv)]:				
Confirm the use of qualified personnel for marking, locating, and direct supervision of known excavation work, as appropriate.				
Confirm the use of qualified personnel for monitoring of excavations conducted on covered pipeline segments by pipeline personnel, as appropriate.				
Other:				
<i>[Note: Add location specific information, as appropriate.]</i>				
3B. Installed Automatic Shut-off Valves (Protocol H.07)	Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify additional preventive and mitigative actions implemented by Operator.</b>			<b>X</b>	
Document that additional measures evaluated by the operator cover alternatives such as, installing Automatic Shut-off Valves or Remote Control Valves, installing computerized monitoring and leak detection systems, replacing pipe segments with pipe of heavier wall thickness, providing additional training to personnel on response procedures, conducting drills with local emergency responders and implementing additional inspection and maintenance programs, as appropriate				
Verify that the operator has a process to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas. [§192.935(c)]				
Verify operation of installed remote control valve by reviewing operator inspection/remote control records for partially opening and closing the valve, as appropriate.				
Other:				
<i>[Note: Add location specific information, as appropriate.]</i>				

**Part 4 - Field Investigations (Additional Activities as appropriate)**

<b>4A. Field Inspection for Verification of HCA Locations</b>				Satisfactory	Unsatisfactory	N/C	Notes:
<b>Review HCAs locations as identified by the Operator. Utilize NPMS and Operator maps, as appropriate.</b>						X	
Verify that the operator's integrity management program includes accurate and updated system maps or other suitably detailed means documenting the pipeline segment locations that are located in high consequence areas, as appropriate. [§192.905(a)]							
Review the operator's applicable procedures and forms used to document new information from one-calls, surveys, aerial & ground patrols are being completed by field personnel to communicate new developments that may impact high consequence areas or that may create new high consequence areas to IM personnel, as appropriate. [§192.905(c)]							
Review the operator's applicable procedures and forms to confirm that new HCAs and class location changes are being identified through it's continuing surveillance program as required by §192.613 and §192.905.							[Note: Add location specific information, as appropriate.]
<b>4B. Field Inspection for Verification of Anomaly Digs</b>				Satisfactory	Unsatisfactory	N/C	Notes:
<b>Verify repair areas, ILI verification sites, etc.</b>						X	
Document the anomaly dig sites observed and reviewed as part of this field activity and the actions taken by the operator.							[Note: Add location specific information, as appropriate.]
<b>4C. Field Inspection to Verify adequacy of the Cathodic Protection System</b>				Satisfactory	Unsatisfactory	N/C	Notes:
<b>In case of hydrostatic pressure testing, Cathodic Protection (CP) systems must be evaluated for general adequacy.</b>				X			
The operator should review the CP system performance in conjunction with a hydrostatic pressure test to ensure the integrity assessment addressed applicable threats to the integrity of the pipeline. Has the operator reviewed the CP system performance in conjunction with the hydrostatic pressure test?							
Review records of CP readings from CIS and/or annual survey to ensure minimum code requirements are being met, if available.							
Review results of random field CP readings performed during this activity to ensure minimum code requirements are being met, if possible. Perform random rectifier checks during this activity and ensure rectifiers are operating correctly, if possible.							Reviewed annual CP survey data for 2008 and 2009. In general the CP is excellent with pipe-to-soil values greater than 850 mvDC (on).  Cathodic Protection readings of pipe to soil at dig site (if available): On Potential: >850 mV Off Potential: _____ mV  [Note: Add location specific information and note whether CP readings were from the surface or from the pipe following exposure, as appropriate.]
<b>4D. Field inspection for general system characteristics</b>				Satisfactory	Unsatisfactory	N/C	Notes:
<b>Through field inspection determine overall condition of pipeline and associated facilities for a general estimation of the effectiveness of the operator's IMP implementation.</b>				X			
Evaluate condition of the ROW of inspection site to ensure minimum code requirements are being met, as appropriate.							
Comment on Operator's apparent commitment to the integrity and safe operation of their system, as appropriate.							
Check ROW for pipeline markers in line-of-sight and Emergency call-in number on marker posts.							
Other:							

## Anomaly Evaluation Report *(to be completed as appropriate)*

<b>Pipeline System and Line Pipe Information</b>		
Operator (OpID and System Name):		
Unit ID (Pipeline Name)		
Pipe Manufacturer and Year:	Seam Type and Orientation:	
Pipe Nominal OD (inch):	Depth of Cover:	
Pipe Nominal Wall thickness (inch):	Coating Type and Condition:	
Grade of Pipe:	MAOP:	
<b>ILI Reported Information</b>		
ILI Technology (e.g., Vendor, Tools):		
Anomaly Type (e.g., Mechanical, Metal Loss):		
Is anomaly in a segment that can affect an HCA? (Yes / No)		
Date of Tool Run (MM/DD/YY):	Date of Inspection Report (MM/DD/YY):	
Date of "Discovery of Anomaly" (MM/DD/YY):		
Type of "Condition" (e.g.; Immediate; 60-day; 180-day):		
Anomaly Feature (Int/Ext):	Orientation (O'clock position):	
Anomaly Details: Length (in):	Width (in):	Depth (in):
Anomaly Log Distance (ft):	Distance from Upstream weld (ft):	
Length of joint(s) of pipe in which anomaly is identified (ft):		
<b>Anomaly Dig Site Information Summary</b>		
Date of Anomaly Dig (MM/DD/YY):		
Location Information (describe or attach map):		
Mile Post Number:	Distance from A/G Reference (ft):	
Distance from Upstream weld (ft):		
GPS Readings (if available) Longitude:	Latitude:	
Anomaly Feature (Int/Ext):	Orientation:	
Length of joint of pipe in which anomaly is found (ft):		
<b>For Mechanical Damage Anomaly</b>		
Damage Type (e.g., original construction, plain dent, gouge):		
Length (in):	Width (in):	Depth (in):
Near a weld? (Yes / No):		
Gouge or metal loss associated with dent? (Yes / No):	Are multiple dents present? (Yes / No):	
Did operator perform additional NDE to evaluate presence of cracks in dent? (Yes / No):		
Cracks associated with dent? (Yes / No):		
<b>For Corrosion Metal Loss Anomaly</b>		
Anomaly Type (e.g., pitting, general):		
Length (in):	Width (in):	Max. Depth (in):
Remaining minimum wall thickness (in):	Maximum % Wall Loss measurement(%):	
Safe pressure calculation (psi), as appropriate:		
<b>For "Other Types" of Anomalies</b>		
Describe anomaly (e.g., dent with metal loss, crack, seam defect, SCC):		
Length (in):	Width (in):	Max. Depth (in):
Other Information, as appropriate:		
Did operator perform additional NDE to evaluate presence of cracks? (Yes / No):		
Cracks present? (Yes / No):		



