

**Utilities and Transportation Commission  
Standard Inspection Report for Intrastate Gas Systems  
Procedures and Plan Review**

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

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

Inspection Report			
<b>Docket Number</b>	PG-100054		
<b>Inspector Name &amp; Submit Date</b>	Al Jones / January 11, 2011		
<b>Sr. Eng Name &amp; Review/Date</b>	Joe Subsits, January 12, 2011		
Operator Information			
<b>Name of Operator:</b>	J.R. Simplot Food	<b>OP ID #:</b>	32395
<b>Name of Unit(s):</b>	Headquarters	<b>Unit ID #:</b>	
<b>Records Location:</b>	14124 Wheeler Rd N.E., Moses Lake		
<b>Date(s) of Last Review:</b>	None	<b>Inspection Date</b>	Nov. 29 – Dec. 1, 2010

**Inspection Summary:**

J.R. Simplot potato processing facility located in Moses Lake includes a bio gas digester, compressor station, and 8-inch diameter high density polyethylene bio gas transmission pipeline in Grant County. The pipeline is a Class 2 Location. The line was pressures tested at 90 psig, operates at a 15 psig MAOP, and has a 29.5% SMYS with respect to the pipe design pressure of 51 psig for plastic. This is the initial pipeline inspection from the outlet of the compressor station to the plant's inlet valve and the initial Operation and Maintenance Manual review.

<b>HQ Address:</b> 999 West Main Street Suite 1400 Boise, ID 83702-9008		<b>System/Unit Name &amp; Address:</b> J.R. Simplot 14124 Wheeler Rd NE Moses Lake, WA	
<b>Co. Official:</b>	Mark McKellar, Food Group President	<b>Phone No.:</b>	N/A
<b>Phone No.:</b>	208-384-8225	<b>Fax No.:</b>	N/A
<b>Fax No.:</b>	208-384-8-15	<b>Emergency Phone No.:</b>	N/A
<b>Emergency Phone No.:</b>	509-793-1252		N/A
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>	
Bill Gilmour	Environmental Manager	509-793-1188	
Andrew Erickson	Farm Manager	509-793-1187	
Robert L. Cosentino	Principal Consultant	360-200-4959	

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**GAS SYSTEM OPERATIONS**

<b>GAS SYSTEM OPERATIONS</b>		
Gas Supplier	<i>JR Simplot Moses Lake Digester Facility</i>	
<b>Operating Pressure(s):</b>	<b>MAOP (Within last year)</b>	<b>Actual Operating Pressure (At time of Inspection)</b>
Feeder:		
Town:		
Other:    Bio Gas Digrester	15 psig	15 psig
Does the operator have any transmission pipelines?    NO, but the plastic pipeline operates at 29.5% with respect to plasti pipe's design pressure.		

**Pipe Specifications:**

Year Installed (Range)	2009	Pipe Diameters (Range)	8"
Material Type	HD Polyethelene	Line Pipe Specification Used	
Mileage	1.42	SMYS %	29.5% with respect to design pressure for plastic pipe.

**49 CFR PART 191 & CHAPTER 480-93 WAC**

**REPORTING PROCEDURES**

		S	U	N/A	N/C
1.	Telephonic reports to <b>NRC (800-424-8802)</b> 191.5	X			
2.	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours)</b> for events which;    480-93-200(1)				
3.	(a) Results in a fatality or personal injury requiring hospitalization;	X			
4.	(b) Results in damage to the property of the operator and others of a combined total exceeding fifty thousand dollars;	X			
5.	(c) Results in the evacuation of a building, or high occupancy structures or areas	X			
6.	(d) Results in the unintentional ignition of gas;	X			
7.	(e) Results in the unscheduled interruption of service furnished by any operator to twenty-five or more distribution customers;	X			
8.	(f) Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC <u>480-93-020</u> ;	X			
9.	(g) Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or	X			
10.	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within <b>24 hours</b> ) for;    480-93-200(2)	X			
11.	(a) The uncontrolled release of gas for more than two hours;	X			
12.	b) The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;	X			
13.	(c) A pipeline or system operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
14.	(d) A pipeline or system pressure exceeding the MAOP.	X			
15.	30 day written incident (federal) reports; (DOT Form F 7100.1)    191.9(a) For Transmission & Gathering Lines; (DOT Form F 7100.2)    191.15(a)	X			
16.	Supplemental incident reports    191.9(b) For Transmission & Gathering lines    191.15(b)	X			
17.	Written incident reports <b>filed with the commission</b> (within 30 days); and include the following; 480-93-200(4) (a) thru (g)	X			
18.	480-93-180 (1) Supplemental reports <b>filed with the commission</b> 480-93-200(5)	X			

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REPORTING PROCEDURES			S	U	N/A	N/C
19.		Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure 480-93-200(6)	X			
20.	480-93-180 (1)	Annual Report (DOT Form PHMSA F-7100.2-1) For Transmission & Gathering 191.17(a)	X			
		Annual Reports <b>filed with the commission</b> no later than March 15 for the proceeding calendar year 480-93-200(7)				
21.	480-93-180 (1)	<ul style="list-style-type: none"> <li>A copy of PHMSA form F-7100.1-1 or F-7100.2-1 annual report required by the PHMSA/OPS 480-93-200(7)(a)</li> </ul>	X			
22.		<ul style="list-style-type: none"> <li>Annual Damage Prevention Statistics Report (eff 6/02/05) including the following; 480-93-200(7)(b)(i) thru (iii)</li> </ul>	X			
23.		Annual report on construction defects or material failures 480-93-200(7)(c)	X			
24.		Providing updated emergency contact information to the Commission and appropriate officials 480-93-200(8)	X			
25.		Providing daily construction and repair activities reports 480-93-200(9)	X			
26.		Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form (when required) 480-93-200(10)	X			
27.		Safety related condition reports (SRCR) 191.23	X			
28.		Filing the SRCR within 5 days of determination, but not later than 10 days after discovery 191.25	X			

Required Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002			S	U	N/A	N/C
	49 U.S.C. 60132, Subsection (b)	Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to <a href="http://www.npms.phmsa.dot.gov/submission/">http://www.npms.phmsa.dot.gov/submission/</a> to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates.	X			
	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?	X			

**Comments:**

Item #13: Low pressure is not a concern, because the bio gas is blended with a natural gas source of fuel.

49 CFR PART 192 SUBPART A – GENERAL CHAPTER 480-93 WAC – GAS COMPANIES--SAFETY			S	U	N/A	N/C
29.	480-93-180 (1)	Procedures for notifying new customers, within 90 days, of their responsibility for those selections of service lines not maintained by the operator. §192.16			X	
30.		Conversion to Service - Any pipelines previously used in service not subject to Part 192? 192.14			X	

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**Comments:**

Item #29: Simplot is the only customer.  
 Item #30: The pipeline is new and not subject to conversion to service requirements.

SUBPART B - MATERIALS			S	U	N/A	N/C
		Are minimum requirements prescribed for the selection and qualification of pipe and components for use in pipelines 192.51				
31.	480-93-180 (1)	For <b>steel</b> pipe, manufactured in accordance with and meet the listed specification found under Appendix B 192.55			X	
		For <b>new</b> plastic pipe, qualified for use under this part if: 192.59(a)				
32.	480-93-180 (1)	<ul style="list-style-type: none"> <li>• It is manufactured in accordance with a listed specification; and 192.59(a)(1)</li> <li>• It is resistant to chemicals with which contact may be anticipated. 192.59(a) (2)</li> </ul>	X			
		For <b>used</b> plastic pipe, qualified for use under this part if: 192.59(b)				
33.	480-93-180 (1)	<ul style="list-style-type: none"> <li>• It was manufactured in accordance with a listed specification; 192.59(b)(1)</li> <li>• It is resistant to chemicals with which contact may be anticipated; 192.59(b)(2)</li> <li>• It has been used only in natural gas service. 192.59(b)(3)(4)</li> <li>• Its dimensions are still within the tolerances of the specification to which it was manufactured; and, 192.59(b)</li> <li>• It is free of visible defects. 192.59(b)(5)</li> </ul>			X	
34.		Marking of Materials 192.63	X			

**Comments:**

Items #31 & 33: Simplot does not have a steel pipeline.

SUBPART C – PIPE DESIGN						
		Procedures for assuring that the minimum requirements for design of pipe are met				
		<b>For Steel Pipe</b>	S	U	N/A	N/C
35.		Pipe designed of sufficient wall thickness, or installed with adequate protection, to withstand anticipated external pressures and loads that will be imposed on the pipe after installation. 192.103			X	
36.		Design formula for steel pipe. 192.105(a)			X	
37.	480-93-180 (1)	Yield strength (S) for steel pipe. 192.107			X	

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**SUBPART C – PIPE DESIGN**

38.	480-93-180 (1)	Nominal wall thickness (t) for steel pipe. 192.109 (a) & (b) (a) If the nominal wt is not known..... Determined by measuring the thickness of each piece of pipe at quarter points on one end unless..... (b) If the pipe is of uniform grade, size, and thickness and more than 10 lengths of pipeline, only 10 percent of the individual lengths, but not less than 10 lengths, need be measured. The thickness of the lengths that are not measured must be verified by applying a gauge set to the minimum thickness found by the measurement. The nominal wall thickness to be used in the design formula in §192.105 is the next wall thickness found in commercial specifications that is below the average of all the measurements taken. However, the nominal wall thickness used may not be more than 1.14 times the smallest measurement taken on pipe less than 20 inches (508 millimeters) in outside diameter, nor more than 1.11 times the smallest measurement taken on pipe 20 inches (508 millimeters) or more in outside diameter.			X	
39.		Design factor (F) for steel pipe. 192.111				
40.		(a) Except as otherwise provided in paragraphs (b), (c), and (d) of this section, the design factor to be used in the design formula in §192.105 is determined in accordance with the following Class location Design factor (F) table. Class 1 <b>0.72</b> , Class 2 <b>0.60</b> , Class 3 <b>0.50</b> , Class 4 <b>0.40</b>			X	
41.		(b) A design factor of 0.60 or less must be used in the design formula in §192.105 for steel pipe in Class 1 locations that: (1) Crosses the right-of-way of an unimproved public road, without a casing; (2) Crosses without a casing, or makes a parallel encroachment on, the right-of-way of either a hard surfaced road, a highway, a public street, or a railroad; (3) Is supported by a vehicular, pedestrian, railroad, or pipeline bridge; or (4) Is used in a fabricated assembly, (including separators, mainline valve assemblies, cross-connections, and river crossing headers) or is used within five pipe diameters in any direction from the last fitting of a fabricated assembly, other than a transition piece or an elbow used in place of a pipe bend which is not associated with a fabricated assembly.			X	
42.		(c) For Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for uncased steel pipe that crosses the right-of-way of a hard surfaced road, a highway, a public street, or a railroad.			X	
43.		(d) For Class 1 and Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in §192.105 for- (1) Steel pipe in a compressor station, regulating station, or measuring station, and (2) Steel pipe, including a pipe riser, on a platform located offshore or in inland navigable waters.			X	
44.		Longitudinal joint factor (E) for steel pipe. 192.113			X	
45.	480-93-180 (1)	Temperature derating factor (T) for steel pipe. 192.115			X	
<b>For Plastic Pipe</b>						
46.	480-93-180 (1)	Subject to the limitations of §192.123, for determining the design pressure for plastic pipe in accordance with either formula listed. 192.121	X			
47.		For assuring that the design limitations for plastic pipe are not exceeded. 192.123 (a) thru (e)	X			

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**Comments:**

**Items #35 thru #45: Not applicable because, Simplot's pipeline is made from high density polyethylene.**

<b>SUBPART D – DESIGN OF PIPELINE COMPONENTS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		For the design and installation of pipeline components and facilities, and relating to protection against accidental over-pressuring. 192.141				
<b>48.</b>	480-93-180 (1)	General requirements... 192.143	X			
<b>49.</b>		Qualifying metallic components. 192.144 (a) & (b)			X	
<b>50.</b>		For steel valves; meeting the minimum requirements of API 6D, or other standard that provides an equivalent performance level. 192.145 (a) thru (c)			X	
<b>51.</b>		For each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B16.5, MSS SP-44, or the equivalent. 192.147 (a) thru (c)			X	
<b>52.</b>		For ensuring that each new transmission line and each replacement of line pipe, valve, fitting, or other line component in a transmission line is designed and constructed to accommodate the passage of instrumented internal inspection devices. 192.150 (a) thru (c)			X	
<b>53.</b>		Components fabricated by welding. 192.153 (a) thru (d)			X	
<b>54.</b>		Welded branch connections. 192.155			X	
<b>55.</b>		Flexibility. 192.159			X	
<b>56.</b>		Supports and Anchors 192.161(a) (a) thru (f)			X	
		<b>Compressor Stations</b>				
<b>57.</b>	480-93-180 (1)	Compressor stations: Design and construction. 192.163 (a) thru (e)			X	
<b>58.</b>		Compressor stations: Liquid removal. 192.165 (a) & (b)			X	
<b>59.</b>		Compressor stations: Emergency shutdown. 192.167 (a) thru (c)			X	
<b>60.</b>	480-93-180 (1)	Compressor stations: Pressure limiting devices. 192.169 (a) & (b)			X	
<b>61.</b>		Compressor stations: Additional safety equipment. 192.171 (a) thru (e)			X	
<b>62.</b>		Compressor stations: Ventilation. 192.173			X	
<b>63.</b>		Pipe-type and bottle-type holders. 192.175			X	
<b>64.</b>		Additional provisions for bottle-type holders. 192.177			X	
<b>65.</b>	480-93-180 (1)	Transmission line valves. 192.179 (a) thru (d)			X	
<b>66.</b>		Distribution line valves. 192.181(a) thru (c)			X	
<b>67.</b>	480-93-180 (1)	Vaults: Structural design requirements 192.183 (a) thru (c)			X	
<b>68.</b>		Vaults: Accessibility 192.185 (a) thru (c)			X	
<b>69.</b>		Vaults: Sealing, venting, and ventilation. 192.187 (a) thru (c)			X	
<b>70.</b>		Vaults: Drainage and waterproofing 192.189 (a) thru (c)			X	
<b>71.</b>		Design pressure of plastic fittings 192.191 (a) & (b)			X	
<b>72.</b>		Valve installation in plastic pipe. 192.193			X	

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SUBPART D – DESIGN OF PIPELINE COMPONENTS			S	U	N/A	N/C
73.	480-93-180 (1)	Protection against accidental over-pressuring 192.195 (a) & (b)			X	
74.		Control of the pressure of gas delivered from high-pressure distribution systems. 192.197 (a) thru (c)			X	
75.		Except for rupture discs, each pressure relief or pressure limiting device must: 192.199 (a) thru (h)			X	
76.		Required capacity of pressure relieving and limiting stations. 192.201(c)	X			
77.		Instrument, Control, and Sampling Pipe and Components 192.203(a) & (b)	X			

**Comments:**

Item # 49 through #75: **Not applicable because, Simplot's pipeline is made from high density polyethylene, compressor is not jurisdictional, compressor output capacity is maximum 15psig and no vaults greater than 200 cf.**

SUBPART E – WELDING OF STEEL IN PIPELINES			S	U	N/A	N/C
WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION						
78.	480-93-180(1)	Welding procedures must be qualified under <b>Section 5 of API 1104</b> (19 <sup>th</sup> ed.1999, 10/31/01 errata) or <b>Section IX of ASME Boiler and Pressure Code</b> (2001 ed.) by destructive test. .225(a)			X	
79.		Retention of welding procedure – details and test .225(b)			X	
80.		Welders must be qualified by <b>Section 6 of API 1104</b> (19 <sup>th</sup> ed.1999, 10/31/01 errata) or <b>Section IX of ASME Boiler and Pressure Code</b> (2001 ed.) See exception in .227(b). .227(a)			X	
81.		Welders may be qualified under <b>section I of Appendix C</b> to weld on lines that operate at < <b>20% SMYS</b> . .227(b)			X	
		Oxyacetylene welders may qualify under 49 CFR § 192 Appendix C, but may only weld the following size pipe: 480-93-080(1)(a)	S	U	N/A	N/C
82.	480-93-180 (1)	<ul style="list-style-type: none"> <li>Nominal <b>two-inch</b> or smaller branch connections to nominal <b>six-inch</b> or smaller main or service pipe. 480-93-080(1)(a)(i)</li> </ul>			X	
83.		<ul style="list-style-type: none"> <li>Nominal <b>two-inch</b> or smaller below ground butt welds 480-93-080(1)(a)(ii)</li> </ul>			X	
84.		<ul style="list-style-type: none"> <li>Nominal <b>four-inch</b> or smaller above ground manifold and meter piping operating at 10 psig or less. 480-93-080(1)(a)(iii)</li> </ul>			X	
85.		<ul style="list-style-type: none"> <li>Appendix C Welders re-qualified <b>2/Yr (7.5Months)</b> 480-93-080(1)(a)(iv)</li> </ul>			X	
86.	480-93-180(1)	Use of testing equipment to record and document essential variables 480-93-080(1)(b) (eff 6/02/05)			X	
87.		Qualified written welding procedures must be located on-site where welding is being performed 480-93-080(1)(d)			X	
88.		Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. 480-93-080(3) (eff 6/02/05)			X	
89.	480-93-180(1)	To weld on compressor station piping and components, a welder must successfully complete a destructive test .229(a)			X	
90.		Welder must have used welding process within the preceding <b>6 months</b> .229(b)			X	
91.		A welder qualified under .227(a)... .229(c)				
92.		<ul style="list-style-type: none"> <li>May not weld on pipe that operates at <math>\geq</math> 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the <b>sections 6 or 9 of API Standard 1104</b>; may maintain an ongoing qualification status by performing welds tested and found acceptable at least <b>twice per year</b>, not exceeding <b>7½ months</b>; may not requalify under an earlier referenced edition. .229(c)(1)</li> </ul>			X	
93.		<ul style="list-style-type: none"> <li>May not weld on pipe that operates at &lt; 20% SMYS unless is tested in accordance</li> </ul>			X	

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		with .229(c)(1) or re-qualifies under .229(d)(1) or (d)(2). .229(c)(2)					
		Welders qualified under .227(b) may not weld unless: .229(d)	S	U	N/A	N/C	
94.	480-93-180(1)	<ul style="list-style-type: none"> <li>Re-qualified within <b>1 year/15 months</b>, or .229(d)(1)</li> </ul>			X		
95.		<ul style="list-style-type: none"> <li>Within <b>7½ months</b> but at least <b>twice per year</b> had a production weld pass a qualifying test .229(d)(2)</li> </ul>			X		
96.		Welding operation must be protected from weather .231			X		
97.		Miter joints ( <b>consider pipe alignment</b> ) .233			X		
98.		Welding preparation and joint alignment .235			X		
99.		Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure: .241(a) thru (c)			X		
100.		Nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld .243 (a) thru (f)			X		
101.		Repair or removal of defects.245 (a) thru (c)			X		
			<ul style="list-style-type: none"> <li>Sleeve Repair – low hydrogen rod (<b>Best Practices –ref. API 1104 App. B, In Service Welding</b>)</li> </ul>				

**Comments:**

Items #78 through #101: Not applicable because, Simplot's pipeline is made from high density polyethelene.

SUBPART F - JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING WAC 480-93-080 – WELDER & PLASTIC JOINER IDENTIFICATION and QUALIFICATION			S	U	N/A	N/C
102.	480-93-180(1)	Joining of plastic pipe .281				
103.		A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint. 281(a)	X			
104.		Each solvent cement joint on plastic pipe must comply with the following: .281(b)	X			
105.		<ul style="list-style-type: none"> <li>The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint. .281(b)(1)</li> </ul>	X			
106.		<ul style="list-style-type: none"> <li>The solvent cement must conform to ASTM Designation: D 2513. .281(b)(2)</li> </ul>	X			
107.		<ul style="list-style-type: none"> <li>The joint may not be heated to accelerate the setting of the cement. .281(b)(3)</li> </ul>	X			
108.		Each heat-fusion joint on plastic pipe must comply with the following: .281(c)				
109.		<ul style="list-style-type: none"> <li>A butt heat-fusion joint must be joined by a device that holds the heater element square to the ends of the piping, compresses the heated ends together, and holds the pipe in proper alignment while the plastic hardens. .281(c)(1)</li> </ul>	X			
110.		<ul style="list-style-type: none"> <li>A socket heat-fusion joint must be joined by a device that heats the mating surfaces of the joint uniformly and simultaneously to essentially the same temperature. .281(c)(2)</li> </ul>	X			
111.		<ul style="list-style-type: none"> <li>An electrofusion joint must be joined utilizing the equipment and techniques of the fittings manufacturer or equipment and techniques shown, by testing joints to the requirements of §192.283(a)(1)(iii), to be at least equivalent to those of the fittings manufacturer. .281(c)(3)</li> </ul>	X			
112.		<ul style="list-style-type: none"> <li>Heat may not be applied with a torch or other open flame. .281(c)(4)</li> </ul>	X			
113.		Each adhesive joint on plastic pipe must comply with the following: .281(d)				
114.		<ul style="list-style-type: none"> <li>The adhesive must conform to ASTM Designation: D 2517. .281(d)(1)</li> </ul>	X			
115.		<ul style="list-style-type: none"> <li>The materials and adhesive must be compatible with each other. .281(d)(1)</li> </ul>	X			
116.		Each compression type mechanical joint on plastic pipe must comply with the following: .281(e)				



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117.		<ul style="list-style-type: none"> <li>The gasket material in the coupling must be compatible with the plastic. .281(e)(1)</li> </ul>	X			
118.		<ul style="list-style-type: none"> <li>A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling. .281(e)(2)</li> </ul>	X			
119.	480-93-180(1)	Before any written procedure established under §192.273(b) is used for making plastic pipe joints by a heat fusion, solvent cement, or adhesive method, the procedure must be qualified by subjecting specimen joints made according to the procedure to the following tests: .283(a)				
120.		The burst test requirements of— .283(a)(1)				
121.		<ul style="list-style-type: none"> <li>Thermoplastic pipe: paragraph 6.6 (sustained pressure test) or paragraph 6.7 (Minimum Hydrostatic Burst Test) or paragraph 8.9 (Sustained Static pressure Test) of ASTM D2513 .283(a)(1)(i)</li> </ul>	X			
122.		<ul style="list-style-type: none"> <li>Thermosetting plastic pipe: paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517; or .283(a)(1)(ii)</li> </ul>	X			
123.		<ul style="list-style-type: none"> <li>Electrofusion fittings for polyethylene pipe and tubing: paragraph 9.1 (Minimum Hydraulic Burst Pressure Test), paragraph 9.2 (Sustained Pressure Test), paragraph 9.3 (Tensile Strength Test), or paragraph 9.4 (Joint Integrity Tests) of ASTM Designation F1055. .283(a)(1)(iii)</li> </ul>	X			
124.		For procedures intended for lateral pipe connections, subject a specimen joint made from pipe sections joined at right angles according to the procedure to a force on the lateral pipe until failure occurs in the specimen. If failure initiates outside the joint area, the procedure qualifies for use; and, .283(a)(2)	X			
125.	480-93-180(1)	For procedures intended for non-lateral pipe connections, follow the tensile test requirements of ASTM D638, except that the test may be conducted at ambient temperature and humidity If the specimen elongates no less than 25 percent or failure initiates outside the joint area, the procedure qualifies for use. .283(a)(3)	X			
126.		Before any written procedure established under §192.273(b) is used for making mechanical plastic pipe joints that are designed to withstand tensile forces, the procedure must be qualified by subjecting five specimen joints made according to the procedure to the following tensile test: .283(b)				
127.		<ul style="list-style-type: none"> <li>Use an apparatus for the test as specified in ASTM D 638 (except for conditioning). .283(b)(1)</li> </ul>	X			
128.		<ul style="list-style-type: none"> <li>The specimen must be of such length that the distance between the grips of the apparatus and the end of the stiffener does not affect the joint strength. .283(b)(2)</li> </ul>	X			
129.		<ul style="list-style-type: none"> <li>The speed of testing is 0.20 in. (5.0 mm) per minute, plus or minus 25 percent. .283(b)(3)</li> </ul>	X			
130.		<ul style="list-style-type: none"> <li>Pipe specimens less than 4 inches (102 mm) in diameter are qualified if the pipe yields to an elongation of no less than 25 percent or failure initiates outside the joint area. .283(b)(4)</li> </ul>	X			
131.		<ul style="list-style-type: none"> <li>Pipe specimens 4 inches (102 mm) and larger in diameter shall be pulled until the pipe is subjected to a tensile stress equal to or greater than the maximum thermal stress that would be produced by a temperature change of 100° F (38° C) or until the pipe is pulled from the fitting. If the pipe pulls from the fitting, the lowest value of the five test results or the manufacturer's rating, whichever is lower must be used in the design calculations for stress. .283(b)(5)</li> </ul>	X			
132.		<ul style="list-style-type: none"> <li>Each specimen that fails at the grips must be retested using new pipe. .283(b)(6)</li> </ul>	X			
133.	<ul style="list-style-type: none"> <li>Results pertain only to the specific outside diameter, and material of the pipe tested, except that testing of a heavier wall pipe may be used to qualify pipe of the same material but with a lesser wall thickness. .283(b)(7)</li> </ul>	X				
134.		A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints. .283(c)	X			
135.		Pipe or fittings manufactured before July 1, 1980, may be used in accordance with procedures that the manufacturer certifies will produce a joint as strong as the pipe. .283(d)	X			
136.		No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by: .285(a)				
137.		<ul style="list-style-type: none"> <li>Appropriate training or experience in the use of the procedure; and .285(a)(1)</li> </ul>	X			

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138.	480-93-180(1)	<ul style="list-style-type: none"> <li>Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section. .285(a)(2)</li> </ul>	X			
139.		The specimen joint must be: .285(b)				
140.		<ul style="list-style-type: none"> <li>Visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure; and .285(b)(1)</li> </ul>	X			
141.		<ul style="list-style-type: none"> <li>In the case of a heat fusion, solvent cement, or adhesive joint; .285(b)(2)</li> </ul>	X			
142.		Tested under any one of the test methods listed under §192.283(a) applicable to the type of joint and material being tested; .285(b)(2)(i)	X			
143.		Examined by ultrasonic inspection and found not to contain flaws that may cause failure; or .285(b)(2)(ii)	X			
144.		Cut into at least three longitudinal straps, each of which is: .285(b)(2)(iii)	X			
145.		Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and .285(b)(2)(iii)(A)	X			
146.		Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area. .285(b)(2)(iii)(B)	X			
147.		A person must be requalified under an applicable procedure, if during any 12-month period that person: .285(c)				
148.	480-93-180(1)	<ul style="list-style-type: none"> <li>Does not make any joints under that procedure; or .285(c)(1)</li> </ul>	X			
149.		<ul style="list-style-type: none"> <li>Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513. .285(c)(2)</li> </ul>	X			
150.		Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section. .285(d)	X			
	Plastic pipe joiners re-qualified <b>1/Yr (15 Months)</b> 480-93-080 (2)					
151.	480-93-180(1)	<ul style="list-style-type: none"> <li>Qualified written plastic joining procedures must be located on-site where plastic joining is being performed. 480-93-080(2)(a)</li> </ul>	X			
152.		<ul style="list-style-type: none"> <li>Plastic pipe joiners re-qualified if no production joints made during any 12 month period 480-93-080(2)(b) (eff 6/02/05)</li> </ul>	X			
153.		<ul style="list-style-type: none"> <li>Tracking production joints or re-qualify joiners <b>1/Yr (12Months)</b> 480-93-080(2)(c) (eff 6/02/05)</li> </ul>	X			
154.	480-93-180(1) / 192.273(b)	No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure. .287	X			

Comments:

SUBPART G – CONSTRUCTION REQUIREMENTS for TRANSMISSION LINES and MAINS			S	U	N/A	N/C
155.	480-93-180(1)	Compliance with specifications or standards. 192.303			X	
156.		Inspection of each transmission line and main during construction 192.305			X	
157.		Inspection of materials 192.307			X	
158.		Repair of steel pipe 192.309 (a) thru (e)			X	
159.		Repair of plastic pipe. 192.311	X			
160.		Bends and elbows. 192.313 (a) thru (c)			X	
161.		Wrinkle bends in steel pipe. 192.315 (a) & (b)			X	

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162.		Protection from hazards 192.317 (a) thru (c)			X	
163.		Installation of Pipe in a ditch 192.319 (a) thru (c)			X	
164.		Installation of plastic pipe. 192.321 (a) thru (h)	X			
<b>480-93-178 WAC PROTECTION OF PLASTIC PIPE</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
165.	480-93-180(1)	Procedures for the storage, handling, and installation of plastic pipelines in accordance with the latest applicable manufacturer's recommended practices. 480-93-178(1)	X			
166.		Stated acceptable time limit for maximum cumulative ultraviolet light exposure 480-93-178 (2)			X	
167.		Separation requirements when installing plastic pipelines parallel to other underground utilities 480-93-178 (4)	X			
168.		Separation requirements when installing plastic pipelines perpendicular to other underground utilities 480-93-178 (5)	X			
169.		Casings 192.323 (a) thru (d)	X			
170.		Casing of pipelines. 480-93-115 (1) thru (4)	X			
171.		Underground clearance. 192.325 (a) thru (d).	X			
172.		Cover. 192.327 (a) thru (g)	X			

**Comments:**

Items #155 through #158, #160 through #163, and #166: Not applicable because, Simplot's pipeline is made from high density polyethelene.

**SUBPART H - CUSTOMER METERS, SERVICE REGULATORS, and SERVICE LINES**

			S	U	N/A	N/C
173.	480-93-180 (1)	Meters and service regulators installed at locations as prescribed under 192.353 (a) thru (d)			X	
174.		Service regulator vents and relief vents installed and protected from damage. Vaults housing meters and regulators protected from loading due to vehicular traffic. 192.355 (a) thru (c)			X	
175.	480-93-180 (1)	Meters and regulators installed to minimize stresses and insure that potential releases vent to outside atmosphere. 192.357 (a) thru (d)			X	
<b>480-93-140 WAC SERVICE REGULATORS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
176.	480-93-180 (1)	Procedures for installing, operating, and maintaining service regulators in accordance with federal and state regulations, and manufacturer's recommended installation and maintenance practices. 480-93-140(1)			X	
177.		Procedures for inspecting and testing service regulators and associated safety devices during the initial turn-on, and when a customer experiences a pressure problem. Testing must include..... 480-93-140(2)			X	
178.	480-93-180 (1)	Minimum service line installation requirements as prescribed under 192.361 (a) thru (g)			X	
179.		Location of service-line valves as prescribed under 192.365 (a) thru (c)			X	
180.		General requirements for locations of service-line connections to mains and use of compression fittings 192.367 (a) thru (b)(2)			X	
181.		Connections of service lines to cast iron or ductile iron mains. 192.369 (a) thru (b)			X	
182.		Provisions for new service lines not in use 192.379 (a) thru (c)			X	
183.		If EFVs are installed, they must meet the performance requirements of §192.381 (a) thru (e)			X	
184.		If the operator has a voluntary installation program for excess flow valves, the program must meet the requirements outlined in §192.383.			X	

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185.		If the operator <b>does not</b> have a voluntary program for EFV installations, customers must be notified in accordance with §192.383.		X

**Comments:**  
 Items #173 through #185: Simplot does not have service meters and regulators.

SUBPART I - CORROSION CONTROL			S	U	N/A	N/C
186.	480-93-180(1)	Corrosion procedures established for the Design, Operations, Installation & Maintenance of CP systems, carried out by, or under the direction of, a person qualified in pipeline corrosion control methods .453			X	
187.	480-93-180(1)	For pipelines installed <b>after July 31, 1971</b> , buried segments must be externally coated and .455 (a) cathodically protected within <b>one year</b> after construction (see exceptions in code) .455 (b)			X	
188.	480-93-180(1)	Aluminum may not be installed in a buried or submerged pipeline if exposed to an environment with a natural <b>pH in excess of 8</b> (see exceptions in code) .455 (c)			X	
189.	480-93-180(1)	All effectively coated steel transmission pipelines installed prior to <b>August 1, 1971</b> , must be cathodically protected .457 (a)			X	
190.	480-93-180(1)	If installed <b>before August 1, 1971</b> , cathodic protection must be provided in areas of active corrosion for: bare or ineffectively coated transmission lines, and bare or coated c/s, regulator sta., meter sta. piping, and (except for cast iron or ductile iron) bare or coated distribution lines. .457 (b)			X	
191.		Written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. 480-93-110(4)			X	
192.		Examination of buried pipeline when exposed: if corrosion is found, further investigation is required .459			X	
193.		Recording the condition of all underground metallic facilities each time the facilities are exposed. 480-93-110(6)			X	
194.		CP test reading on all exposed facilities where coating has been removed 480-93-110(8) (eff 6/02/05)			X	
195.		Procedures must address the protective coating requirements of the regulations. External coating on the steel pipe must meet the requirements of this part. .461	S	U	N/A	N/C
196.		Cathodic protection level according to <b>Appendix D</b> criteria .463			X	
197.		Pipe-to-soil monitoring ( <b>1 per yr/15 months</b> ) .465(a)			X	
198.		Rectifier monitoring ( <b>6 per yr/2½ months</b> ) .465(b)			X	
199.		Interference bond monitoring ( <b>as required</b> ) .465(c)			X	
200.		Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) 480-93-110(2)			X	
201.		Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas ( <b>1 per 3 years/39 months</b> ) .465(e)			X	
202.		Sufficient test stations to determine CP adequacy .469			X	
203.		Test lead maintenance .471				
204.		Interference currents .473			X	
205.	Proper procedures for transporting corrosive gas? .475(a)			X		

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SUBPART I - CORROSION CONTROL			S	U	N/A	N/C
206.	480-93-180(1)	Written program to monitor for indications of internal corrosion. The program must also have remedial action requirements for areas where internal corrosion is detected. 480-93-110(7) (eff 6/02/05)			X	
207.		Removed pipe must be inspected for internal corrosion. If found, the adjacent pipe must be inspected to determine extent. Certain pipe must be replaced. Steps must be taken to minimize internal corrosion. .475(b)			X	
208.		Systems to reduce internal corrosion Amdt 192- (no number) Pub. 4/23/07, eff. 5/23/07			X	
209.		(a) New construction .476			X	
210.		(b) Exceptions -- offshore pipeline and systems replaced before 5/23/07			X	
211.		(c) Evaluate impact of configuration changes to existing systems			X	
212.		Internal corrosion control coupon (or other suit. Means) monitoring (2 per yr/7½ months) .477			X	
213.		Each exposed pipe must be cleaned and coated (see exceptions under .479(c)) .479(a)			X	
214.		Offshore splash zones and soil-to-air interfaces must be coated			X	
215.		• Coating material must be suitable .479(b)			X	
216.		Coating is not required where operator has proven that corrosion will: .479(c)				
217.		1. Only be a light surface oxide, or .479(c)(1)			X	
218.		2. Not affect safe operation before next scheduled inspection .479(c)(2)			X	
219.		Written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action. 480-93-110(9) (eff 6/02/05)			X	
220.		Atmospheric corrosion control monitoring (1 per 3 yrs/39 months onshore; 1 per yr/15 months offshore) .481(a)			X	
221.		Special attention required at soil/air interfaces, thermal insulation, under dis-bonded coating, pipe supports, splash zones, deck penetrations, spans over water .481(b)			X	
222.		Protection must be provided if atmospheric corrosion is found (per §192.479) .481(c)			X	
223.		Replacement and required pipe must be coated and cathodically protected (see code for exceptions) .483			X	
224.		Procedures to replace pipe or reduce the MAOP if general corrosion has reduced the wall thickness? .485(a)			X	
225.		Procedures to replace/repair pipe or reduce MAOP if localized corrosion has reduced wall thickness (unless reliable engineering repair method exists)? .485(b)			X	
226.	Procedures to use Rstreng or B-31G to determine remaining wall strength? .485(c)			X		
227.	Remedial measures (distribution lines other than cast iron or ductile iron) .487			X		
228.	Remedial measures (cast iron and ductile iron pipelines) .489			X		
229.	Records retained for each cathodic protection test, survey, or inspection required by 49 CFR Subpart I, and chapter 480-93 WAC. 480-93-110			X		
230.	Corrosion control maps and record retention (pipeline service life or 5 yrs) .491			X		
<b>WAC 480-93-110 Corrosion Requirements</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
230.	480-93-180(1)	Casings inspected/tested annually not to exceed fifteen months 480-93-110(5)			X	
231.		Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods 480-93-110(5)(a)			X	
232.		Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days 480-93-110(5)(b)			X	
233.		Casing shorts cleared when practical 480-93-110(5)(c)			X	
234.		Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months 480-93-110(5)(d)			X	
235.		CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched) 480-93-110(3)			X	

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**Comments:**  
Items #186 through #235: Simplot's pipeline is made from high density polyethylene, thus CP is not applied.

SUBPART J – TEST REQUIREMENTS			S	U	N/A	N/C
236.	480-93-180(1)	Procedures to ensure that the provisions found under 192.503(a) thru (d) for new segments of pipeline, or Return to Service segments of pipeline which have been relocated or replaced are met.	X			
237.		Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS. 192.505 (a) thru (e)			X	
238.		Test requirements for pipelines to operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig. 192.507 (a) thru (c)			X	
239.		Test requirements for pipelines to operate below 100 psig. 192.509 (a) & (b)	X			
240.		Test requirements for service lines. 192.511 (a) thru (c)	X			
241.		Test requirements for plastic pipelines. 192.513 (a) thru (d)	X			
242.		Environmental protection and safety requirements. 192.515 (a) & (b)	X			
243.		Records 192.517 Refer also to 480-93-170 (7) (a-h) below.	X			

**Comments:**  
Items #237 and #238: Simplot's pipeline does not operate above 100 psig and more than 30% SMYS.

WAC 480-93-170 PRESSURE TEST PROCEDURES			S	U	N/A	N/C
244.	480-93-180(1)	Notification in writing, to the commission, at least two business days prior to any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the SMYS 480-93-170(1)	X			
245.		<ul style="list-style-type: none"> <li>In Class 3 or Class 4 locations, as defined in 49 CFR § 192.5, or within one hundred yards of a building, must be at least eight hours in duration. 480-93-170(1)(a)</li> </ul>	X			
246.		<ul style="list-style-type: none"> <li>When the test medium is to be a gas or compressible fluid, each operator must notify the appropriate public officials so that adequate public protection can be provided for during the test. 480-93-170(1)(b)</li> </ul>	X			
247.		<ul style="list-style-type: none"> <li>In an emergency situation where it is necessary to maintain continuity of service, the requirements of subsection (1) of this section and subsection (1)(a) may be waived by notifying the commission by telephone prior to performing the test. 480-93-170(1)(c)</li> </ul>			X	
248.		Minimum test pressure for any steel service line or main, must be determined by multiplying the intended MAOP by a factor determined in accordance with the table located in 49 CFR § 192.619 (a)(2)(ii). 480-93-170(2)			X	
249.		Re-testing of service lines broken, pulled, or damaged, resulting in the interruption of gas supply to the customer, must be pressure tested from the point of damage to the service termination valve prior to being placed back into service. 480-93-170(4)			X	
250.		Maintain records of all pressure tests performed for the life of the pipeline and document information as listed under 480-93-170(7) (a-h).	X			
251.		Maintain records of each test where multiple pressure tests are performed on a single installation. 480-93-170(9)	X			

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252.		Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations. 480-93-170(10)	X			
253.		<ul style="list-style-type: none"> <li>When there are no manufacturer's recommendations, then tested at an appropriate schedule determined by the operator.</li> </ul>	X			
254.		<ul style="list-style-type: none"> <li>Test equipment must be tagged with the calibration or accuracy check expiration date.</li> </ul>	X			

**Comments:**

Items #247 through # 249: Simplot does not operate service line.

**SUBPART K - UPRATING**

		Provisions for meeting the minimum requirements for increasing maximum allowable operating pressure (uprating) for pipelines.	S	U	N/A	N/C
255.	480-93-180(1)	General requirements. 192.553 (a) thru (d)			X	
256.		Upgrading to a pressure that will produce a hoop stress of 30 % or more of SMYS in steel pipelines. 192.555 (a) thru (e)			X	
257.		Upgrading: Steel pipelines to a pressure that will produce a hoop stress less than 30 % of SMYS: (plastic, iron, and ductile iron pipelines.) 192.557 (a) thru (d)			X	
		<b>WAC 480-93-155 - UPRATING</b>				
258.	480-93-180(1)	Notification of uprate and submission of written plan 480-93-155 (1)			X	
259.		Content of written plan... 480-93-155 (1) (a) thru (j)			X	
260.		Upgrades must be based on a previous or current pressure test that will substantiate the intended MAOP. 480-93-155 (2)			X	

**Comments:**

Items #255 through #250: Simplot main was pressured tested at maximum level for PE, thus will not qualify for uprating in the future.

**SUBPART L - OPERATIONS**

			S	U	N/A	N/C
261.	480-93-180(1) / 192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) 192.605(a) <b>Note:</b> Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09	X			
262.		Availability of construction records, maps, operating history to operating personnel 192.605(b)(3)	X			
263.		Start up and shut down of the pipeline to assure operation within MAOP plus allowable buildup 192.605(b)(5)	X			
264.		Periodic review of personnel work – effectiveness of normal O&M procedures 192.605(b)(8)	X			
265.		Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line 192.605(b)(9)	X			
266.		Routine inspection and testing of pipe-type or bottle-type holders 192.605(b)(10)				X

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SUBPART L - OPERATIONS			S	U	N/A	N/C
267.		Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under §192.615(a)(3) specifically apply to these reports. 192.605(b)(11)	X			

**Comments:**  
Item #266: Simplot pipeline does not have bottle-type holders.

SUBPART L – OPERATIONS ABNORMAL OPERATING PROCEDURES – TRANSMISSION LINES						
		Procedures for responding to, investigating, and correcting the cause of: 192.605(c)(1)	S	U	N/A	N/C
268.	480-93-180(1) / 192.605(a)	• Unintended closure of valves or shut downs 192.605(c)(1)(i)		X		
269.		• Increase or decrease in pressure or flow rate outside of normal operating limits 192.605(c)(1)(ii)		X		
270.		• Loss of communications 192.605(c)(1)(iii)		X		
271.		• The operation of any safety device 192.605(c)(1)(iv)		X		
272.		• Malfunction of a component, deviation from normal operations or personnel error 192.605(c)(1)(v)		X		
273.		Checking variations from normal operation after abnormal operations ended at sufficient critical locations 192.605(c)(2)		X		
274.		Notifying the responsible operating personnel when notice of an abnormal operation is received 192.605(c)(3)		X		
275.		Periodic review of personnel work – effectiveness of abnormal operation procedures 192.605(c)(4)		X		

**Comments:**  
Items #268 - #275 see notice of probable violation report.

SUBPART – L CHANGE in CLASS LOCATION PROCEDURES			S	U	N/A	N/C
276.	480-93-180(1) /	Class location study 192.609	X			
277.	192.605(a)	Confirmation or revision of MAOP 192.611	X			

SUBPART – L CONTINUING SURVEILLANCE PROCEDURES			S	U	N/A	N/C
278.	192.613	Procedures for surveillance and required actions relating to change in class location, failures, leakage history, corrosion, substantial changes in CP requirements, and unusual operating and maintenance conditions 192.613(a)	X			
279.	192.613	Procedures requiring MAOP to be reduced, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition 192.613(b)	X			



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SUBPART – L    DAMAGE PREVENTION PROGRAM PROCEDURES			S	U	N/A	N/C
280.	480-93-180(1) / 192.605(a)	Participation in a qualified one-call program, or if available, a company program that complies with the following:	X			
281.		Identify persons who engage in excavating .614(c)(1)	X			
282.		Provide notification to the public in the One Call area .614(c) (2)	X			
283.		Provide means for receiving and recording notifications of pending excavations .614(c) (3)	X			
284.		Provide notification of pending excavations to the members .614(c) (4)	X			
285.		Provide means of temporary marking for the pipeline in the vicinity of the excavations .614(c) (5)	X			
286.		Provides for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys?	X			
287.		<b>Damage Prevention (Operator Internal Performance Measures)</b>	S	U	N/A	N/C
288.		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			
289.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?	X			
290.		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			
291.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
292.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
293.	Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X				
294.	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X				
295.	<b>Informational purposes only. Not Required.</b> Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at <a href="https://identity.damagereporting.org/cgareg/control/login.do">https://identity.damagereporting.org/cgareg/control/login.do</a> Y X N	X				
296.	<p style="text-align: center;"><b>PHMSA Areas of Emphasis:</b></p> <ul style="list-style-type: none"> <li>• Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies?</li> </ul>			X		
297.	<ul style="list-style-type: none"> <li>• Does the operator review records of accidents and failures due to excavation damage to ensure causes of failures are addressed to minimize the possibility of recurrence?</li> </ul>	X				

**Comments:**

Item #296 Simplot does not perform drilling or boring.

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SUBPART – L    EMERGENCY PROCEDURES			S	U	N/A	N/C
298.	480-93-180(1) / 192.615	Receiving, identifying, and classifying notices of events which require immediate response by the operator .615(a)(1) <b>Note:</b> Including third-party damage	X			
299.		Establish and maintain communication with appropriate public officials regarding possible emergency .615(a)(2)	X			
300.		Prompt response to each of the following emergencies: .615(a)(3)	X			
301.		(i) Gas detected inside a building	X			
302.		(ii) Fire located near a pipeline	X			
303.		(iii) Explosion near a pipeline	X			
304.		(iv) Natural disaster	X			
305.		<b>Note:</b> Including third-party damage	X			
306.		Availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency .615(a)(4)	X			
307.		Actions directed towards protecting people first, then property .615(a)(5)	X			
308.	Emergency shutdown or pressure reduction to minimize hazards to life or property .615(a)(6)	X				
309.	480-93-180(1) / 192.615	Making safe any actual or potential hazard to life or property .615(a)(7)	X			
310.		Notifying appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials .615(a)(8)	X			
311.		Instructions for restoring service outages after the emergency has been rendered safe .615(a)(9)	X			
312.		Investigating accidents and failures as soon as possible after emergency .615(a)(10)	X			
313.		Furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action .615(b)(1)	X			
314.		Training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training .615(b)(2)	X			
315.		Reviewing activities following emergencies to determine if the procedures were effective .615(b)(3)	X			
316.		Establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies .615(c)	X			

Comments:

SUBPART – L    PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)			S	U	N/A	N/C
317.	480-93-180(1) / 192.605(a)	Public Awareness Program in accordance with API RP 1162 (Amdt 192-99 pub. 5/19/05, eff. 06/20/05 and Amdt 192 – not numbered pub 12/13/07 eff. 12/13/07). .616				
318.		The operators program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .616(d)	X			
319.		(1) Use of a one-call notification system prior to excavation and other	X			
320.		(2) Possible hazards associated with unintended releases from a gas pipeline facility;	X			
321.		(3) Physical indications of a possible release;	X			
322.		(4) Steps to be taken for public safety in the event of a gas pipeline release;	X			
323.		Does program include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations. .616(e)	X			
324.		The operator's program and the media used must be comprehensive enough to reach all areas the operator transports gas. .616(f)	X			
325.		Is the program conducted in English and any other languages commonly understood by a significant number of the population? .616(g)	X			

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326.		Operations of a master meter			X	
327.		Operators of a Master Meter or petroleum gas system (unless the operator transports gas as a primary activity) must develop/implement a written procedure to provide it's customers public awareness messages twice annually: .616(j) (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.			X	
328.		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. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than <b>June 20, 2010</b> . .616(h)			X	

**SUBPART – L FAILURE INVESTIGATION PROCEDURES**

			S	U	N/A	N/C
329.	480-93-180(1) / 192.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617	X			

**Comments:**

Items #326 - #328: Simplot does not operate a master meter system.

**SUBPART – L MAOP PROCEDURES**

			S	U	N/A	N/C															
<b>Note: If the operator is operating under a Special Permit, a Waiver or 192.620, the inspector needs to review the special conditions of the Special Permit, Waiver or refer to Attachment 1 for additional .620 requirements.</b>																					
330.		Establishing <b>MAOP</b> so that it is commensurate with the class location .619	X																		
331.	480-93-180(1)	<b>MAOP</b> cannot exceed the lowest of the following:																			
332.	192.605(a)	• Design pressure of the weakest element; .619(a)(1)	X																		
333.		• Test pressure divided by applicable factor .619(a)(2)	X																		
334.	480-93-180(1) / 192.605(a)	• The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in second column, unless the segment was tested according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K. <b>Note: For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.</b> .619(a)(3)																			
		<table border="1"> <thead> <tr> <th>Pipeline segment</th> <th>Pressure date</th> <th>Test date</th> </tr> </thead> <tbody> <tr> <td>-- Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006.</td> <td>March 15, 2006, or date line becomes subject to this part, whichever is later.</td> <td>5 years preceding applicable date in second column.</td> </tr> <tr> <td>--Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.</td> <td></td> <td></td> </tr> <tr> <td>Offshore gathering lines.</td> <td>July 1, 1976.</td> <td>July 1, 1971.</td> </tr> <tr> <td>All other pipelines.</td> <td>July 1, 1970.</td> <td>July 1, 1965.</td> </tr> </tbody> </table>	Pipeline segment	Pressure date	Test date	-- Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.	--Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.			Offshore gathering lines.	July 1, 1976.	July 1, 1971.	All other pipelines.	July 1, 1970.	July 1, 1965.			X	
Pipeline segment	Pressure date	Test date																			
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Offshore gathering lines.	July 1, 1976.	July 1, 1971.																			
All other pipelines.	July 1, 1970.	July 1, 1965.																			
335.		• Maximum safe pressure determined by operator. .619(a)(4)	X																		
336.		• Overpressure protective devices must be installed if .619(a)(4) is applicable .619(b)	X																		
337.	480-93-180(1)	• The requirements on pressure restrictions in this section do not apply in the following			X																

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	192.605(a)	instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with § 192.611. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. <b>Note: For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. .619(c)</b>				
338.		MAOP - High Pressure Distribution Systems .621 <b>Note:</b> New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)				X
339.		Max./Min. Allowable Operating Pressure - Low Pressure Distribution Systems .623				X

**Comments:**

Items #333, #337, #338, #339: Simplot MAOP was determined by hydrostatic pressure test not historical pressures. The pipeline does not include distribution systems or low pressure systems.

**WAC 480-93-015**

**ODORIZATION PROCEDURES**

			S	U	N/A	N/C
340.		Odorization of gas at the proper concentration in air 480-93-015 (1)			X	
341.	480-93-180(1)	Use of odorant testing instrumentation/Monthly testing interval 480-93-015 (2)			X	
342.		Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) 480-93-015 (3)			X	
343.	480-93-180(1)	Records maintained for usage, odorant tests performed and equipment calibration (5yrs) 480-93-015(4)			X	

**Comments:**

Items #340 - #343: Simplot bio gas has a natural odorant that does not requiring additional odorization.

**SUBPART – L TAPPING PIPELINES UNDER PRESSURE PROCEDURES**

			S	U	N/A	N/C
344.	480-93-180(1)	Hot taps must be made by a qualified crew NDT testing is suggested prior to tapping the pipe. Reference API RP 2201 for <b>Best Practices</b> . .627	X			

**SUBPART – L PIPELINE PURGING PROCEDURES**

			S	U	N/A	N/C
345.	480-93-180(1)	Purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline	X			

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		.629				
346.	480-93-180(1)	(a) Lines containing <b>air</b> must be properly purged.	X			
347.	480-93-180(1)	(b) Lines containing <b>gas</b> must be properly purged	X			

**Comments:**

SUBPART – M MAINTENANCE PROCEDURES			S	U	N/A	N/C
348.	480-93-180(1)	Each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from Service .703(b)	X			
349.	480-93-180(1)	Hazardous leaks must be repaired promptly .703(c)	X			

**Comments:**

SUBPART - M TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES			S	U	N/A	N/C												
350.		Patrolling ROW conditions .705(a)	X															
351.	480-93-180(1) /192.605(b)	Maximum interval between patrols of lines: .705 (b)	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)																
352.	Leakage surveys – 1 year/15 months .706	X																
353.	Leak <b>detector equipment</b> survey requirements for lines transporting <b>un-odorized</b> gas (N/A - All pipelines in WA require odorization)																	

WAC 480-93-185 GAS LEAK INVESTIGATION			S	U	N/A	N/C
		Procedures for the prompt investigation of any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities.				
354.	480-93-180(1)	<ul style="list-style-type: none"> <li>received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public 480-93-185(1)</li> </ul>	X			
355.	480-93-180(1)	<ul style="list-style-type: none"> <li>Grade leak in accordance with WAC 480-93-186, and take appropriate action 480-93-185(1)</li> </ul>	X			
356.	480-93-180(1)	<ul style="list-style-type: none"> <li>retain the leak investigation record for the life of the pipeline. 480-93-185(1)</li> </ul>	X			
357.	480-93-180(1)	Prevent removal of any suspected gas facility until the commission or the lead investigative authority has designated the release of the gas facility and keep the facility intact until directed	X			

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		by the lead investigative authority 480-93-185(2)				
358.	480-93-180(1)	Taking appropriate action when leak indications originating from a foreign source. Notification requirements. 480-93-185(3)	X			

WAC 480-93-186 LEAK EVALUATION			S	U	N/A	N/C
359.	480-93-180(1)	Grade leaks as defined in WAC 480-93-18601 to establish the leak repair priority. 480-93-186(1)	X			
360.	480-93-180(1)	procedure for evaluating the concentration and extent of gas leakage 480-93-186(2)	X			
361.	480-93-180(1)	Use of a combustible gas indicator to check the perimeter of a leak area. Follow-up inspection on repaired leaks no later than thirty days following repair. 480-93-186(3)	X			
362.	480-93-180(1)	Grade 1 and 2 leaks downgraded once to Grade 3 leak without a physical repair. After downgrade, repair must be made not to exceed twenty-one months 480-93-186(4)	X			

**Comments:**

WAC 480-93-187 GAS LEAK RECORDS			S	U	N/A	N/C
		Gas leak records must contain, at a minimum, the criteria outlined in 480-93-187 (1-13)				
363.	480-93-180(1)	1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the employee(s) 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.	X			

**Comments:**

WAC 480-93-188 GAS LEAK SURVEYS			S	U	N/A	N/C
364.	480-93-180(1)	gas leak surveys using a gas detection instrument covering areas listed in 480-93-188(1)(a-e)	X			
365.	480-93-180(1)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45	X			

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		days) 480-93-188(2)				
366.		Surveys conducted according to the minimum frequencies outlined under 480-93-188(3)(a-d)	X			
367.		Surveys conducted under the following circumstances outlined under 480-93-188(4)(a-e)	X			
368.		Survey records must be kept for a minimum of five years and contain information required under 480-93-188(5)(a-f)	X			
369.		Self audits as necessary, but not to exceed three years between audits and meet the criteria outlined under 480-93-188(6)(a-c)	X			

**Comments:**

<b>PIPELINE MARKERS PROCEDURES</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
370.	480-93-180(1)	Placement of markers - railroad, road, irrigation and drainage ditch crossings... 480-93-124 (1)	X			
371.		Placement of markers - Separation/Other locations... 480-93-124 (2) & 192.707	X			
372.		Installed at each end of bridges or other spans / Inspected <b>1/YR (15 Months)</b> 480-93-124 (3)	X			
373.		Markers reported missing or damaged replaced within <b>45 days?</b> 480-93-124(4)	X			
374.		Surveys of pipeline markers – Not to exceed <b>5/YR</b> Records 10/Yrs minimum 480-93-124(5)	X			
375.		Maintain maps, drawings or other records indicating class locations and other areas where pipeline markers are required 480-93-124(6)	X			

**Comments:**

<b>SUBPART - M</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>TRANSMISSION RECORD KEEPING PROCEDURES</b>						
376.	480-93-180(1) / 192.605 (b)	Records must be maintained... .709	X			
377.		(a) Repairs to the pipe – <b>life of system</b>	X			
378.		(b) Repairs to “other than pipe” – <b>5 years</b>	X			
379.		(c) Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests – <b>5 years</b> or until next one	X			

<b>SUBPART - M</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>TRANSMISSION LINE FIELD REPAIR PROCEDURES</b>						
<b>Imperfections and Damages</b>						
380.	480-93-180(1) / 192.605 (b)	Repairs of imperfections and damages on pipelines operating above <b>40% SMYS</b>				
381.		<ul style="list-style-type: none"> <li>• Cut out a cylindrical piece of pipe and replace with pipe of ≥ design strength .713(a)(1)</li> </ul>			X	

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SUBPART - M TRANSMISSION LINE FIELD REPAIR PROCEDURES			S	U	N/A	N/C
382.		<ul style="list-style-type: none"> <li>Use of a reliable engineering method .713(a)(2)</li> </ul>			X	
383.		Reduce operating pressure to a safe level during the repair .713(b)			X	
<b>Permanent Field Repair of Welds</b>						
384.		Welds found to be unacceptable under §192.241(c) must be repaired by: .715				
385.		(a) Taking the line out of service and repairing in accordance with §192.245:			X	
386.		<ul style="list-style-type: none"> <li>Cracks longer than <b>8%</b> of the weld length (except offshore) must be removed</li> </ul>			X	
387.		<ul style="list-style-type: none"> <li>For each weld that is repaired, the defect must be removed down to clean metal and the pipe preheated if conditions demand it</li> </ul>			X	
388.		<ul style="list-style-type: none"> <li>Repairs must be inspected to ensure acceptability</li> </ul>			X	
389.	480-93-180(1) / 192.605 (b)	<ul style="list-style-type: none"> <li>Crack repairs or defect repairs in previously repaired areas must be done in accordance with qualified written welding procedures</li> </ul>			X	
390.		(b) If the line remains in service, the weld may be repaired in accordance with §192.245 if:				
391.		<ul style="list-style-type: none"> <li>The weld is not leaking (1)</li> </ul>			X	
392.		<ul style="list-style-type: none"> <li>he pressure is reduced to produce a stress that is <b>20% of SMYS or less</b> (2)</li> </ul>			X	
393.		<ul style="list-style-type: none"> <li>Grinding is limited so that <b>1/8 inch</b> of pipe weld remains (3)</li> </ul>			X	
394.		<ul style="list-style-type: none"> <li>If the weld cannot be repaired in accordance with (a) or (b) above, a full encirclement welded split sleeve must be installed (c)</li> </ul>			X	
<b>Permanent Field Repair of Leaks</b>						
395.		Field repairs of leaks must be made as follows: .717				
396.	480-93-180(1) / 192.605 (b)	<ul style="list-style-type: none"> <li>Replace by cutting out a cylinder and replace with pipe similar or of greater design (a)</li> </ul>			X	
397.		<ul style="list-style-type: none"> <li>Install a full encirclement welded split sleeve of an appropriate design unless the pipe is <b>joined by mechanical couplings and operates at less than 40% SMYS</b> (b)(1)</li> </ul>			X	
398.		<ul style="list-style-type: none"> <li>A leak due to a corrosion pit may be repaired by installing a <b>bolt on leak clamp</b> (b)(2)</li> </ul>			X	
399.	480-93-180(1) / 192.605 (b)	<ul style="list-style-type: none"> <li>For a corrosion pit leak, if a pipe is not more than <b>40,000 psi SMYS</b>, the pits may be repaired by <b>fillet welding a steel plate</b>.</li> <li>The plate must have <b>rounded corners</b> and the same <b>thickness or greater</b> than the pipe, and <b>not more than 1/2D</b> of the pipe size (b)(3)</li> </ul>			X	
400.		<ul style="list-style-type: none"> <li>Submerged offshore pipe or pipe in inland navigable waterways may be repaired with a mechanically applied full encirclement split sleeve of appropriate design (b)(4)</li> </ul>			X	
401.		<ul style="list-style-type: none"> <li>Apply reliable engineering method (b)(5)</li> </ul>			X	
<b>Testing of Repairs</b>						
402.	480-93-180(1) / 192.605 (b)	Replacement pipe must be pressure tested to meet the requirements of a new pipeline .719(a)				
403.		(b) For lines of <b>6-inch diameter or larger</b> and that <b>operate at 20% of more of SMYS</b> , the repair must be nondestructively tested in accordance with §192.241(c)			X	

SUBPART - M DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES			S	U	N/A	N/C
404.	480-93-180(1) / 192.605 (b)	Frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage (i.e., consider cast iron, weather conditions, known slip areas, etc.) .721(a)			X	
405.		Patrolling surveys are required in business districts at intervals not exceeding 4½ months, but at least four times each calendar year .721 (b)(1)			X	
406.		Patrolling surveys are required outside business districts at intervals not exceeding 7½ months,			X	



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		but at least twice each calendar year .721 (b)(2)				
407.		Periodic leak surveys determined by the nature of the operations and conditions. .723 (a)& (b)			X	
408.		In business districts as specified, 1/yr (15 months) .723(b)(1)			X	
409.		Outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos. .723 (b)(2)			X	

SUBPART - M TEST REQUIREMENTS FOR REINSTATING SERVICE LINES			S	U	N/A	N/C
410.	480-93-180(1) /	Except for .725(b), disconnected service lines must be tested the same as a new service line. .725(a)			X	
411.	192.605 (b)	Service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect. See code for exception to this. .725(b)			X	

**Comments:**  
Items #380 - #411: Simplot is not operate above 40% SMYS, is not a distribution system, and the pipeline is non-metallic.

SUBPART - M ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES			S	U	N/A	N/C
412.		Operator must disconnect both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained. Offshore abandoned pipelines must be filled with water or an inert material, with the ends sealed .727(b)	X			
413.		Except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end. .727 (c)	X			
414.		Whenever service to a customer is discontinued, do the procedures indicate one of the following: .727(d)				
415.	480-93-180(1) / 192.605 (b)	The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator .727(d) (1)			X	
416.		A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly .727(d)(2)			X	
417.		The customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed .727(d) (3)	X			

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418.		If air is used for purging, the operator shall ensure that a combustible mixture is not present after purging .727 (e)	X			
419.		Operator must file reports upon abandoning underwater facilities crossing navigable waterways, including offshore facilities. .727(g)			X	

**Comments:**

Items #415, #416: Simplot is not a distribution system  
Item # 419: Simplot has no underwater facilities.

SUBPART - M				S	U	N/A	N/C
PRESSURE LIMITING and REGULATING STATION PROCEDURES							
420.	480-93-180(1) / 192.605 (b)	Inspection and testing procedures for pressure limiting stations, relief devices, pressure regulating stations and equipment (1 per yr/15 months) .739(a)				X	
421.		In good mechanical condition .739(a) (1)				X	
422.		Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed .739(a)(2)				X	
423.		Set to control or relieve at correct pressures consistent with .201(a), except for .739(b). .739(a) (3)				X	
424.		Properly installed and protected from dirt, liquids, other conditions that may prevent proper oper. .739(a)(4)				X	
425.		For steel lines if MAOP is determined per .619(c) and the MAOP is 60 psi gage or more . . . .739(b)					
426.	480-93-180(1) / 192.605 (b)	If MAOP produces hoop stress that	Then the pressure limit is:				
		Is greater than 72 percent of SMYS	MAOP plus 4 percent			X	
		Is unknown as a percent of SMYS	A pressure that will prevent unsafe operation of the pipeline considering its operating and maintenance history and MAOP				
427.	480-93-180(1) / 192.605 (b)	Pressure limiting and regulating stations: Telemetering or recording gages 192.741(a) thru (c)				X	
428.		Testing of Relief Devices .743 (a) thru (c)				X	

**Comments:**

Items #420 - #428: Simplot system does not have pressure limiting station or relief devices.

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SUBPART - M VALVE AND VAULT MAINTENANCE PROCEDURES			S	U	N/A	N/C
429.	480-93-180(1) / 192.605 (b)	Written valve maintenance program detailing the valve selection process, inspection, maintenance, and operating procedures. The written program must detail which valves will be maintained under 49 CFR § 192.745, 49 CFR § 192.747, and 480-93-100. 480-93-100(1)	X			
<b>Transmission Valves</b>						
430.	480-93-180(1) / 192.605 (b)	Inspect and partially operate each transmission valve that might be required during an emergency ( <b>1 per yr/15 months</b> ) .745(a)	X			
431.		Prompt remedial action required, or designate alternative valve .745(b)	X			
<b>Distribution Valves</b>						
432.	480-93-180(1) / 192.605 (b)	Check and service each valve that may be necessary for the safe operation of a distribution system ( <b>1 per yr/15 months</b> ) .747(a)			X	
433.		Prompt remedial action required, or designate alternative valve .747(b)			X	
<b>Service Valves</b>						
434.	480-93-180(1) / 192.605 (b)	Written service valve installation and maintenance program detailing the valve selection process, inspection, maintenance, and operating procedures. Does the program consider the criteria listed under 480-93-100(2)(a-f)?			X	
435.		Service valve maintenance ( <b>1 per yr/15 months</b> ) 480-93-100(3)			X	
436.		Service valve installation and maintenance program fully implemented by 6/01/07? 480-93-100(4)			X	
<b>Vaults</b>						
437.	480-93-180(1) / 192.605 (b)	Inspection of vaults greater than <b>200 cubic feet (1 per yr/15 months)</b> .749			X	

SUBPART - M PREVENTION of ACCIDENTAL IGNITION PROCEDURES			S	U	N/A	N/C
438.	480-93-180(1) / 192.605 (b)	Reduce the hazard of fire or explosion by: (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. 192.751 (a) thru (c)	X			

**Comments:**

Items #432 - #437: Simplot is not a distribution system.

SUBPART - M CAULKED BELL AND SPIGOT JOINTS PROCEDURES			S	U	N/A	N/C
439.		Cast-iron caulked bell and spigot joint repair: .753				
440.	480-93-180(1) / 192.605 (b)	<ul style="list-style-type: none"> <li>When subject to more than 25 psig, sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii) .753(a)</li> </ul>			X	
441.		<ul style="list-style-type: none"> <li>When subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking .753(b)</li> </ul>			X	

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SUBPART - M PROTECTING CAST-IRON PIPELINE PROCEDURES			S	U	N/A	N/C
442.	480-93-180(1) / 192.605 (b)	Operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection. .755				
443.		• Vibrations from heavy construction equipment, trains, trucks, buses or blasting? .755(a)			X	
444.		• Impact forces by vehicles? .755(b)			X	
445.		• Earth movement? .755(c)			X	
446.		• Other foreseeable outside forces which might subject the segment of pipeline to a bending stress .755(d)			X	
447.		Provide permanent protection for the disturbed section as soon as feasible .755(e)			X	

**Comments:**  
Items #439 - #447: Simplot does not have cast iron pipes.

SUBPART N — QUALIFICATION of PIPELINE PERSONNEL			S	U	N/A	N/C
Date of last UTC staff OQ plan review Initial review 11/29/2010						
448.	192.801 192.809	Any revisions to plan since last review? Yes No X If yes, review revisions made.	X			
449.	480-93-180(1)	Have "New Construction" activities been identified and included in the operator's covered task list? 480-93-013	X			

**Comments:**

FILING REQUIREMENTS for DESIGN, SPECIFICATION, and CONSTRUCTION			S	U	N/A	N/C
450.	480-93-180(1)	Submittal of construction procedures, designs, and specifications used for each pipeline facility prior to operating the pipeline. All procedures must detail the acceptable types of materials, fittings, and components for the different types of facilities in the operator's system. 480-93-017(1)	X			
451.	480-93-180(1)	Construction plans not conforming with a gas company's existing and accepted construction procedures, designs, and specifications on file with the commission, submitted to the commission for review at least forty-five days prior to the initiation of construction activity. 480-93-017(2)	X			

MAPS, DRAWINGS, and RECORDS of GAS FACILITIES			S	U	N/A	N/C
452.	480-93-180(1)	Records updated no later than 6 months from completion of construction activity and made available to appropriate personnel. 480-93-018(3)	X			

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PROXIMITY CONSIDERATIONS			S	U	N/A	N/C
453.	480-93-180(1)	Each operator must submit a written request and receive commission approval prior to: 480-93-20(1)			X	
		Operating any gas pipeline facility at greater than five hundred psig that is within five hundred feet of any of the following places: 480-93-20 (1)(a)				
454.	480-93-180(1)	<ul style="list-style-type: none"> <li>• A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or : 480-93-20 (1)(a)(i)</li> </ul>			X	
455.	480-93-180(1)	<ul style="list-style-type: none"> <li>• A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission; or : 480-93-20(1)(a)(ii)</li> </ul>			X	
456.	480-93-180(1)	<ul style="list-style-type: none"> <li>• A public highway, as defined in RCW 81.80.010(3). 480-93-20 (1)(a)(iii)</li> </ul>			X	
457.	480-93-180(1)	Operating any gas pipeline facility at greater than two hundred fifty psig, up to and including five hundred psig, that is operated within one hundred feet of either of the following places: 480-93-20(1)(b)	S	U	N/A	N/C
458.	480-93-180(1)	<ul style="list-style-type: none"> <li>• A building that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning operator in its gas operations; or: 480-93-20(1)(b)(i)</li> </ul>			X	
459.	480-93-180(1)	<ul style="list-style-type: none"> <li>• A high occupancy structure or area that is in existence or under construction prior to the date authorization for construction is filed with the commission. 480-93-20(1)(b)(ii)</li> </ul>			X	
460.	480-93-180(1)	For proposed new construction, document evidence to demonstrate that it is not practical to select an alternate route that will avoid areas or which demonstrates that the operator has considered future development of the area and has designed their pipeline facilities accordingly. 480-93-20(2)			X	

**Comments:**

Items #453 - # 460: Simplot pipeline does not operate at or greater than 250 psig.

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**Attachment 1**  
**Alternative Maximum Allowable Operating Pressure**

For additional guidance refer to <http://primis.phmsa.dot.gov/maop/faqs.htm>  
 For FAQs refer to <http://primis.phmsa.dot.gov/maop/faqs.htm>

192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C								
	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with:												
	<table style="margin-left: auto; margin-right: auto;"> <tr> <td style="padding-right: 40px;">Class Location</td> <td>Alternative Design Factor (F)</td> </tr> <tr> <td style="padding-right: 40px;">1</td> <td>0.80</td> </tr> <tr> <td style="padding-right: 40px;">2</td> <td>0.67</td> </tr> <tr> <td style="padding-right: 40px;">3</td> <td>0.56</td> </tr> </table>	Class Location	Alternative Design Factor (F)	1	0.80	2	0.67	3	0.56				
Class Location	Alternative Design Factor (F)												
1	0.80												
2	0.67												
3	0.56												
.620(a)	(1) Establish alternative MAOP commensurate with class location – no class 4			X									
	(2) MAOP cannot exceed the lowest of the following:												
	(i) Design pressure of the weakest element			X									
	(ii) Test pressure divided by applicable factor			X									
.620(b)	(2) Pipeline constructed of steel pipe meeting additional requirements in §192.112.			X									
	(3) SCADA system with remote monitoring and control			X									
	(4) Additional construction requirements described in §192.328			X									
	(5) No mechanical couplings			X									
	(6) No failures indicative of systemic material fault – if previously operated at lower MAOP			X									
	(7) 95% of girth welds have NDT			X									
.620(c)	(1) PHMSA notified 180 days before operating at alternative MAOP			X									
	(2) Senior Executive signatures and copy to PHMSA			X									
	(4) Strength test per §192.505 or certify previous strength test			X									

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192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C
	(6) Construction tasks treated as covered tasks for Operator Qualification			X	
	(7) Records maintained for life of system			X	
	(8) Class location change anomaly remediations			X	
.620(d)	(1) Threat matrix developed consistent with §192.917			X	
	(2) Recalculate the potential impact circle per §192.903 and implement public education per §192.616			X	
	(3) Responding to an emergency in an HCA				
	(i) Identify HCAs using larger impact circle			X	
	(ii) Check personnel response times			X	
	(iii) Verify remote valve abilities			X	
	(iv) Verify line break valve control system			X	
	(4) Protect the right-of-way:				
	(i) ROW patrols 12 per year not to exceed 45 days			X	
	(ii) Plan to identify and mitigate unstable soil			X	
	(iii) Replace loss of cover if needed			X	
	(iv) Use line-of-sight markers per §192.707			X	
	(v) Review damage prevention program in light of national consensus practices			X	
	(vi) ROW management plan to protect against excavation activities			X	
	(5) Control Internal Corrosion:				
	(i) Program to monitor gas constituents			X	
	(ii) Filter separators if needed			X	
	(iii) Gas Monitoring equipment used			X	
	(iv) Cleaning pigs, inhibitors, and sample accumulated liquids				
.620(d)	(v) Limit CO <sub>2</sub> , H <sub>2</sub> S, and water in the gas stream			X	
	(vi) Quarterly program review based on monitoring results			X	
	(6) (i) Control interference that can impact external corrosion			X	
	(ii) Survey to address interference currents and remedial actions			X	
	(7) Confirm external corrosion control through indirect assessment			X	
	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months				
	(ii) Remediate damage with IR drop > 35%			X	
	(iii) Integrate internal inspection results with indirect assessment			X	
	(iv) Periodic assessments for HCAs			X	
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results				
	(8) Cathodic Protection			X	
	(i) Complete remediations within 6 months of failed reading				
	(ii) Confirm restoration by a close interval survey			X	
	(iii) Cathodic protection system operational within 12 months of construction completion			X	
	(9) Baseline assessment of integrity			X	
	(i)(A) Geometry tool run within 6 months of service				
	(i)(B) High resolution MFL tool run within 3 years of service			X	
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X	

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192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C
	(ii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X	
(10)	Periodic integrity assessments			X	
	(i) Frequency for assessments determined as if all segments covered by Subpart O				
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X	
(11)	Repairs			X	
	(i)(A) Use of the most conservative calculation for anomaly remaining strength				
	(B) Tool tolerances taken into consideration			X	
	(ii) Immediate repairs for:			X	
	(A) Dents meeting 309(b) criteria				
	(B) Defects meeting immediate criteria in §192.933(d)			X	
	(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X	
	(iii) Repairs within 1 year for:			X	
	(A) Defects meeting 1 year criteria in 933(d)				
	(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X	
	(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X	
	(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X	
.620(e)	(1) Provide overpressure protection to a max of 104% MAOP			X	
	(2) Procedure for establishing and maintaining set points for SCADA			X	

**Comments:**  
Simplot did not use the Alternative MAOP Procedure.



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**Recent PHMSA Advisory Bulletins (Last 2 years)**

<b><u>Number</u></b>	<b><u>Date</u></b>	<b><u>Subject</u></b>
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-08-01	May 13, 2008	Pipeline Safety - Notice to Operators of Gas Transmission Pipelines on the Regulatory Status of Direct Sales Pipelines
ADB-08-02	March 4, 2008	Pipeline Safety - Issues Related to Mechanical Couplings Used in Natural Gas Distribution Systems
ADB-08-03	March 10, 2008	Pipeline Safety - Dangers of Abnormal Snow and Ice Build-Up on Gas Distribution Systems
ADB-08-04	June 5, 2008	Pipeline Safety - Installation of Excess Flow Valves into Gas Service Lines
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

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