

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

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

Inspection Report			
Docket Number	PG-110039		
Inspector Name & Submit Date	Dave Cullom / June 15, 2011		
Chief Eng Name & Review/Date	Dave Lykken / June 15, 2011		
Operator Information			
Name of Operator:	City of Buckley	OP ID #:	1848
Name of Unit(s):	City of Buckley		
Records Location:	243 Pearl Street Buckley, WA 98321		
Date(s) of Last (unit) Inspection:	November 3-6, 2008	Inspection Date(s):	May 2-5, May 9-11, and May 17, 2011

Inspection Summary:

This inspection spanned several days and involved records review and a field portion. No non-compliance items were noted with the field portion. Please review the field inspection data collection form for additional details about what items and readings were observed in the field. There were a few probable violations and areas of concern identified that were addresses in the findings portion of the inspection letter. Some areas for improvement are: Following the O&M manual, leak surveys/response, mapping updates, public awareness evaluations, and QA/QC of form entries.

HQ Address: 933 Main Street PO Box 1960 Buckley, WA 98321	System/Unit Name & Address: Same as HQ Address	
Co. Official: Mayor Pat Johnson Phone No.: 360-829-1921 Fax No.: None provided Emergency Phone No.: 253-261-9826 (cell)	Phone No.: (360) 829-1921 Fax No.: None provided Emergency Phone No.: 253-261-9826 (cell)	
Persons Interviewed	Title	Phone No.
Scott Nickels	Gas Utility Lead	(360) 829-1631
Brian Burbank	Gas Utility Journeyman	(360) 829-1631
Mac McCracken	Gas Utility Apprentice	(360) 829-1631
John Dansby	Public Works Supervisor	(360) 829-1631
David Schimdt	City Administrator	(360) 829-1921
Pat Johnson	Mayor	(360) 829-1921
Don Kyllonen	Public Works Journeyman	(360) 829-1631

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

(check one below and enter appropriate date)

<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
X	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	6/2009

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GAS SYSTEM OPERATIONS

Gas Supplier	Williams		
Services: 927 steel 477 PE			
<i>Residential</i>	<i>Commercial</i>	<i>Industrial</i>	<i>Other</i>
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	2 fitting leaks
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	0 in 2010 2 in 2009
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	0	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)	36.73 total and an unknown mileage in class 3. None in class 4
NOTE - Not able to separate by class			
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	MAOP 250	250	235-238
Town:	35psig	45psig	45psig
Other:			
Does the operator have any transmission pipelines?	No		
Compressor stations? Use Attachment 1.	No		

Pipe Specifications:

Year Installed (Range)	1957 - current	Pipe Diameters (Range)	½ - 6
Material Type	Steel & PE	Line Pipe Specification Used	PE 3408
Mileage	36.73 total	SMYS %	below 20%

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at <http://primis.phmsa.dot.gov/oqdb/home.oq> **Date Completed** ~ 5/19/2011

Integrity Management Field Validation

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

REPORTING RECORDS

			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NPMS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates. **Note – The operator has no transmission pipelines**			X	
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? **Note – The operator has no transmission pipelines or lines over 250psig**			X	

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REPORTING RECORDS			S	U	N/A	N/C
3.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802) **Note – None required – no incidents**			X	
4.	191.15	Written reports; supplemental reports to PHMSA (Form F7100.2) **Note – None required – no incidents**			X	
5.	191.23	Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery **Note – None required – no SRCs**			X	
6.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports **Note – None**			X	
7.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
8.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; **Note – None during this inspection time period**			X	
9.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; **Note – None during this inspection time period**			X	
10.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; **Note – None during this inspection time period**			X	
11.	480-93-200(1)(d)	The unintentional ignition of gas; **Note – None during this inspection time period**			X	
12.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; **Note – None during this inspection time period**			X	
13.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; **Note – None during this inspection time period**			X	
14.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; **Note – None during this inspection time period**			X	
15.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
16.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; **Note – None during this inspection time period**			X	
17.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; **Note – None during this inspection time period**			X	
18.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or **Note – None during this inspection time period**			X	
19.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP **Note – None that Scott recalls since the last inspection**			X	
20.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
21.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; **Note – None that Scott recalls since the last inspection**			X	
22.	480-93-200(4)(b)	The extent of injuries and damage; **Note – None that Scott recalls since the last inspection**			X	
23.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; **Note – None that Scott recalls since the last inspection**			X	
24.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; **Note – None that Scott recalls since the last inspection**			X	
25.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; **Note – None that Scott recalls since the last inspection**			X	
26.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; **Note – None that Scott recalls since the last inspection**			X	
27.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; **Note – None that Scott recalls since the last inspection**			X	
28.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; **Note – None that Scott recalls since the last inspection**			X	

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REPORTING RECORDS			S	U	N/A	N/C
29.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; **Note – None that Scott recalls since the last inspection**			X	
30.	480-93-200(4)(j)	Line type; **Note – None that Scott recalls since the last inspection**			X	
31.	480-93-200(4)(k)	City and county of incident; and **Note – None that Scott recalls since the last inspection**			X	
32.	480-93-200(4)(l)	Any other information deemed necessary by the commission. **Note – None that Scott recalls since the last inspection**			X	
33.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted **Note – None that Scott recalls since the last inspection**			X	
34.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure **Note – None that Scott recalls since the last inspection**			X	
35.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
36.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
37.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
38.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field;	X			
39.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and	X			
40.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other.	X			
41.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. **Notes – The operator is over reporting, but noted they will change their definitions of material failure (i.e. they had pipe dope drying out as a material failure) See Comments for #41**	X			
42.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
43.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
44.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

#41 – (16) Construction defects (pipe dope dry) (2) Meter valve dry needing grease Material Failures (1) Compression coupling gasket (20) Regulator Failures

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
45.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator **Note – The operator showed a mailing sheet of what is sent out with the bill**	X			
46.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? **Notes – They use Dresser and Perfection EFVs**	X			

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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
47.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate?	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
48.	480-93-013	OQ records for personnel performing New Construction covered tasks	X			
49.	192.225	Test Results to Qualify Welding Procedures	X			
50.	192.227	Welder Qualification	X			
51.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months)	X			
52.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	X			
53.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	X			
54.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)	X			
55.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 **Notes – None on this system**			X	
56.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains **Notes – None on this system during this inspection time period**			X	
57.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
58.	192.241(a)	Visual Weld Inspector Training/Experience	X			
59.	192.243(b)(2)	Nondestructive Technician Qualification **Notes – The operator has no OQ program for their UT equipment. The operator is --“....using this tool to make sure the pipe is schedule 40 and is not a thinner wall pipe.” **		X		
60.	192.243(c)	NDT procedures **Notes – If used by a contractor, written procedures will be developed and followed per Scott Nickels. They currently have no procedures**		X		
61.	192.243(f)	Total Number of Girth Welds **Note – The operator has no transmission pipelines**			X	
62.	192.243(f)	Number of Welds Inspected by NDT **Note – The operator has no transmission pipelines**			X	
63.	192.243(f)	Number of Welds Rejected **Note – The operator has no transmission pipelines**			X	
64.	192.243(f)	Disposition of each Weld Rejected **Note – The operator has no transmission pipelines**			X	
65.	192.303	Construction Specifications	X			
66.	192.325	Underground Clearance	X			
67.	192.327	Amount, location, cover of each size of pipe installed	X			
68.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length **Note – The operator has no transmission pipelines**			X	
69.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: **Note – The operator has no transmission pipelines**			X	
70.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; **Note – The operator has no transmission pipelines**			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
71.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. **Note – The operator has no transmission pipelines**			X	
72.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed **Note – The operator has no transmission pipelines**			X	
73.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; **Note – The operator has no transmission pipelines**			X	
74.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. **Note – The operator has no transmission pipelines**			X	
75.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; **Note – The operator has no transmission pipelines**			X	
76.	480-93-160(2)(g)	<ul style="list-style-type: none"> • Welding specifications; and **Note – The operator has no transmission pipelines** 			X	
77.	480-93-160(2)(h)	Bending procedures to be followed if needed. **Note – The operator has no transmission pipelines**			X	
78.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS? **Note – The operator has no transmission pipelines**			X	
79.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) **Notes Pg 66 of Buckley O&M The pressure table 6.B needs to be followed when pressure testing.**		X		
80.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? **Note – No construction of this type is occurring **			X	
81.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) **Notes - Checked several gauges for tags and calibration** **Notes - No calibration records for the chart boxes 3 total (2 on system)**		X		
82.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig **Notes - None moved since last inspection per Scott Nickels**			X	
83.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines \leq 60 psig **Notes - None moved since last inspection per Scott Nickels**			X	

Comments:

Half cells should be labeled as to the ID number and the calibration date. Scott agreed to make this change.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
84.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline	X			
85.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years **Notes – checked 2011 and 2010.**	X			
86.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09	X			

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87.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel **Notes – The leak survey map was incorrect also see 133	X			
88.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? **Notes – Since Scott has been there they have caught up on new construction, but there are still issues. There were maps that had the pipeline in the wrong location. Changes were made to the shop grid map, but the maps used for the leak survey were not updated. As a result of having maps with errors and/or omissions, the leak surveys were not complete.**		X		
89.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures **Note – Personnel work is reviewed daily and they will add a procedure change form. They currently use a procedure review form**	X			
90.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures. **Notes – They continually evaluate each other's work and evaluate procedures when they note a deficiency**	X			
91.	192.609	Class Location Study (If applicable) **Notes – Not transmission**			X	
92.	192.614	Damage Prevention (Operator Internal Performance Measures)				
93.		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) **Notes - Gas Lead evaluates quality of locates on random basis**	X			
94.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? **Notes - locates are done in-house**			X	
95.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? **Notes - locates are done in-house**			X	
96.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
97.		Review operator locating and excavation procedures for compliance with state law and regulations.	X			
98.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. **Note - Looked at several records since the last inspection cycle**	X			
99.		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			
100.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys? **Note – No reason to believe damage occurred**			X	
101.		Informational purposes only. Not Required. Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do Y N X	X			

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102.		Emergency Response Plans	S	U	N/A	N/C																										
103.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response **Notes - The first responder definition and procedure 143/144/146 needs to be clarified. 1408 Main St , 157 E Mason, 2.5 hrs response The leak responses were noted as a probable violation of 480-93-185(t)**		X																												
104.	192.615(b)(1)	Location Specific Emergency Plan	X																													
105.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training **Notes – They have safety meetings and discuss the emergency procedures.**	X																													
106.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. *** Notes - They did this after the the 3/18/11 157 E Mason call.***	X																													
107.	192.615(c)	Liaison Program with Public Officials	X																													
108.	192.616	Public Awareness Program																														
109.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below: **Notes – The excavator list in the O&M needs to be more complete given the amount of excavators in the area.**		X																												
110.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.																														
111.		API RP 1162 Baseline* Recommended Message Deliveries																														
112.		<table border="1"> <thead> <tr> <th align="center">Stakeholder Audience (LDC’s)</th> <th align="center">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residence Along Local Distribution System</td> <td>Annual</td> </tr> <tr> <td>LDC Customers</td> <td>Twice annually</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> <tr> <th align="center">Stakeholder Audience (Transmission line operators)</th> <th align="center">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> <tr> <td>Residence Along Local Distribution System</td> <td>2 years</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> </tbody> </table>	Stakeholder Audience (LDC’s)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	Annual	LDC Customers	Twice annually	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual	Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	2 years	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual				
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113.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																														

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114.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.	X			
115.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 . .616(h) **Notes – They made a bunch of changes (magnets, etc but they did not conduct an effectiveness evaluation)**		X		
116.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. **Notes – No MMs or LPG systems**			X	
117.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage (PHMSA area of emphasis) **Notes – The operator needs to add procedures for investigating accidents and failures.**		X		

Comments:

118.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)	X			
119.	480-93-015(1)	Odorization of Gas – Concentrations adequate	X			
120.	480-93-015(2)	Monthly Odorant Sniff Testing Meter 3353 checked every month 2009	X			
121.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements **Notes – No cases during this inspection time period**			X	
122.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
123.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months)	X			
124.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
125.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on	X			
126.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? **Notes – No cases during this inspection time period**			X	
127.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? **Notes – There were two leak investigation report forms for 157 E. Mason where the response to an odor call took 20hrs 10 min to respond on 2/17 and 2hrs 45min to respond on 3-18-2011. Additionally, the leak investigation report form for 1408 Main St shows the leak graded at 10% of gas for a leak detected on 3/10/09 by Heath Consultants. The leak was deferred until 4/7/10. The LEL of Buckley's system has been identified as 5-15% of gas/air and this leak, as indicated, is within the explosive range. It was deferred for over a year and was graded as a Grade 3 leak. This grading appears to be inconsistent with the guidelines for leak grading as outlined in pg 116-118 of the City of Buckley's O&M manual. **		X		
128.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and;	X			

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129.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? **Notes – No documentation indicating that the foreign leaks had the required notification for either 28280 Hwy 410 or 1707 Ryan Rd**		X										
130.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair?	X											
131.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	X											
132.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) **Note - There were several instances where leak survey information was incomplete on the leak survey investigation forms. Some examples are provided below: <ul style="list-style-type: none"> • 1554 Collins 2/24/2010 – There was no indication of the % gas/air on the operator's form before the leak was repaired. The Heath Consultants' Survey shows this leak having 80% gas and it was classified as a Class II leak. The heath consultant also has 50 LEL indicated on the barhole map, but the text states 80% gas is present. • 126 Naches St N - This leak has 65% gas over the service line listed on the Heath Consultants' Survey. It was graded as a Class II leak by Heath and listed as a Class III by the operator on the leak survey investigation form. The % gas/air on the operator's form was missing. • 151 B Street – The leak was graded as a Class III leak, but it was indicated that there was 25% gas present. • 1408 Main St – This leak has 10% gas listed on the leak investigation form as well as the Heath Consultants' Survey. It was graded as a Class III leak.** 		X										
133.	480-93-188(1)	Gas leak surveys **Notes - No map records of bridge leak survey for 2009 and the 2010 and 2011 maps had errors. The mapping accuracy and currency issue identified in question 87 resulted in the leak surveys not being performed over the services and mains as required.**		X										
134.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) **Notes - Heath calibration records were provided at exit interview**	X											
135.	480-93-188(3)	Leak survey frequency (Refer to Table Below) **Notes - missed frequency since not over main	X											
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Business Districts (implement by 6/02/07)</td> <td style="width: 50%;">1/yr (15 months)</td> </tr> <tr> <td>High Occupancy Structures **Notes - Operator calls these places of public con</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Pipelines Operating ≥ 250 psig</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Other Mains: CI, WI, copper, unprotected steel</td> <td>2/yr (7.5 months)</td> </tr> </table>							Business Districts (implement by 6/02/07)	1/yr (15 months)	High Occupancy Structures **Notes - Operator calls these places of public con	1/yr (15 months)	Pipelines Operating ≥ 250 psig	1/yr (15 months)	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)
Business Districts (implement by 6/02/07)	1/yr (15 months)													
High Occupancy Structures **Notes - Operator calls these places of public con	1/yr (15 months)													
Pipelines Operating ≥ 250 psig	1/yr (15 months)													
Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)													
136.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs **Notes - None noted**			X									
137.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred **Notes Collins Rd and Collins Ct. Equipment # 47642	X											
138.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected **Notes - None noted**			X									
139.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions **Notes - None noted**			X									
140.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in **Notes - None noted**			X									
141.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f)	X											
142.	480-93-188(6)	Leak program - Self Audits **Notes - 2010 and 2011 reviewed. The self audits did not find any issues with the leak program. Several areas for improvement were found during this inspection. The leak program audit process needs review.**		X										
143.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 **Notes – Not a transmission line.**			X									

**Utilities and Transportation Commission
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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)

144.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 **Notes - No transmission lines**			X													
		<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>	Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months				
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr	7½ months																
4	4/yr	4½ months																
145.	192.603(b)	Patrolling Business District (4 per yr/4½ months) Reviewed last three years of records	X															
146.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	X															
147.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) **Notes - None – the rule reads “..anticipated”**	X															
148.	192.603(b)	Tests for Reinstating Service Lines 192.725 **Notes - None needing reinstatement**			X													
149.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 **Notes - None**			X													
150.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X															
151.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X															
152.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 **Notes - None**			X													
153.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 They have a list of ERVs - Need to check	X															
154.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X															
155.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 ***Notes – They only one that could be close to that limit would be the delivery point/isolation flange and the operator said it is smaller than that size.***			X													
156.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751	X															
157.	192.603(b)	Welding – Procedure 192.225(b)	X															
158.	192.603(b)	Welding – Welder Qualification 192.227/.229	X															
159.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) **Notes – Not a transmission line.**			X													
160.	192.709	NDT Records (pipeline life) .243(f) **Notes – Not a transmission line.**			X													
161.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	X															
162.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) **Notes – Not a transmission line.**			X													

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
163.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) **Notes – Coatings identified on page 87 of O&M **	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
164.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) ***Notes - No new mains installed with steel**			X	
165.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	X			
166.	192.491	Maps or Records .491(a) **Notes - Reviewed deep well maps and the isolated services anodes**	X			
167.	192.491	Examination of Buried Pipe when exposed .459	X			
168.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed **Notes – not all facilities have reading taken**	X			
169.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X			
170.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) **Notes – Checked 2009 – 2011	X			
171.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) **Notes - No Bonds Identified			X	
172.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) ** Notes - No Bonds Identified			X	
173.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
174.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation.	X			
175.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) ***Notes - None noted**			X	
176.	192.491	Electrical Isolation (Including Casings) .467	X			
177.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months **Note – remind person checking casings to write down the on/off for the casing per the O&M manual**		X		
178.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods **Notes - None**			X	
179.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days	X			
180.	480-93-110(5)(c)	Casing shorts cleared when practical **Notes - No records were produced to verify that they checked the casings in accordance with their procedures as detailed on Pg. 86 of the O&M manual**		X		
181.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months **Notes - None**			X	
182.	192.491	Interference Currents .473 ***Notes - None known ***			X	
183.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) **Notes - None**			X	
184.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)***No corrosion found **Note - Operator should clarify internal and external corrosion grading methods (Good, Great used)		X		
185.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477**Notes - None**			X	
186.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 **Notes - The atmospheric corrosion survey form shows several sites graded as “4” which, given the operators grading scale, translates to “Heavy Pitting, Pipe Loss.” There were no pit gauge measurements or prompt remediation taken on multiple services. The survey was performed in 2007 and several of the services were not remediated until 2010. The O&M manual on pages 94 and 95 appears that it was not followed.**		X		
187.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/485	X			

Comments:

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Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
188.	192.161	Supports and anchors	X			
189.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	X			
190.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	X			
191.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	X			
192.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed.	X			
193.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?	X			
194.	480-93-015(1)	Odorization	X			
195.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel? **Note – already addressed in question 88**		X		
196.	192.179	Valve Protection from Tampering or Damage	X			
197.	192.455	Pipeline coatings meet requirements of 192.461 <i>(for buried pipelines installed after 7/31/71)</i>	X			
198.	192.463	Levels of cathodic protection	X			
199.	192.465	Rectifiers	X			
200.	192.467	CP - Electrical Isolation	X			
201.	192.476	Systems designed to reduce internal corrosion	X			
202.	192.479	Pipeline Components exposed to the atmosphere	X			
203.	192.481	Atmospheric Corrosion: monitoring	X			
204.	192.491	Test Stations – Sufficient Number .469	X			
205.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
206.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
207.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	X			
208.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
209.	192.605	Knowledge of Operating Personnel	X			
210.	480-93-124	Pipeline markers	X			
211.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
212.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) **Notes – Not a transmission line**			X	
213.	192.195	Overpressure protection designed and installed where required?	X			
214.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			
215.	192.741	Telemetry, Recording Gauges	X			
216.	192.751	Warning Signs **Notes – 192.751 is prevention of accidental ignition**	X			
217.	192.355	Customer meters and regulators. Protection from damage	X			
218.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	X			
219.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
220.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	X			
221.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	X			
222.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
223.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No X				
224.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? **Notes - No above ground installations**			X	
225.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? **Notes - No above ground installations**			X	
226.	192.745	Valve Maintenance (Transmission) **Notes - No transmission lines/valves**			X	
227.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
Pressure Limiting Station		Rainier School
Rectifier		City Shop
Odorant Testing Station		City Shop
Pressure Limiting Station/Metering Station		Flume

Comments:

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

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

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

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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		COMPRESSOR STATION PROCEDURES		S	U	N/A	N/C
228.	.605(b)						
229.		.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
230.		.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units			X	
231.		.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			X	
232.		.735	(a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
233.			(b) Tank must be protected according to NFPA #30			X	
234.		.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			X	
235.			• 50% of the upright side areas are permanently open, or			X	
236.			• It is an unattended field compressor station of 1000 hp or less			X	

Comments:

****Notes - No Compressor Stations****

			COMPRESSOR STATION O&M RECORDS				S	U	N/A	N/C
237.	.709	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)			X				
238.		.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)			X				
239.		.736(c)	Compressor Stations – Detection and Alarms (Performance Test)			X				

Comments:

****Notes - No Compressor Stations****

				COMPRESSOR STATIONS INSPECTION (Field)				S	U	N/A	N/C
				(Note: Facilities may be "Grandfathered")							
240.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X					
241.			Door latch must open from inside without a key			X					
242.			Doors must swing outward			X					
243.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X					
244.			Each gate located within 200 ft of any compressor plant building must open outward			X					
245.			When occupied, the door must be opened from the inside without a key			X					

Attachment 1

Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
246.	(c)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			X	
247.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
248.	(b)	Do the liquid separators have a manual means of removing liquids?			X	
249.		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
250.	.167 (a)	ESD system must:				
251.		- Discharge blowdown gas to a safe location			X	
252.		- Block and blow down the gas in the station			X	
253.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
254.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
255.		ESD system must be operable from at least two locations, each of which is:				
256.		- Outside the gas area of the station			X	
257.		- Not more than 500 feet from the limits of the station			X	
258.		- ESD switches near emergency exits?			X	
259.	(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
260.	(c)	Are ESDs on platforms designed to actuate automatically by...				
261.		- For unattended compressor stations, when:				
262.		▪ The gas pressure equals MAOP plus 15%?			X	
263.		▪ An uncontrolled fire occurs on the platform?			X	
264.		- For compressor station in a building, when				
265.		▪ An uncontrolled fire occurs in the building?			X	
266.		▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?			X	
267.	.171 (a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
268.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
269.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
270.	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
271.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
272.	.173	Is each compressor station building adequately ventilated?			X	
273.	.457	Is all buried piping cathodically protected?			X	
274.	.481	Atmospheric corrosion of aboveground facilities			X	
275.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
276.		Are facility maps current/up-to-date?			X	
277.	.615	Emergency Plan for the station on site?			X	
278.	.619	Review pressure recording charts and/or SCADA			X	

Attachment 1

Distribution Operator Compressor Station Inspection

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

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
279.	.707	Markers			X	
280.	.731	Overpressure protection – relief's or shutdowns			X	
281.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
282.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			X	
283.	.736	Gas detection – location			X	

Comments:
****Notes - No Compressor Stations****