

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Material Safety Administration

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PART A - OPERATOR INFORMATION

Pipeline operator/owner: Gas Transmission Northwest Corporation (GTN)		OPID #: 15014
Company Official name, title, telephone, FAX #: Ken Leier, Regional Director Tel: 509-533-2831 FAX: 509-533-2825	Mailing address of Company Official: 201 West North River Drive Spokane, Washington 99201	
Nature and size of operator's system (total miles, HCA miles, products, environmental conditions, employees): The Rosalia District is located in Spokane and Whitman Counties of eastern Washington and extends south from the Idaho/Washington border to the Snake River crossing. The natural gas pipeline is approximately 100 miles in length. The transmission lines are primarily in Class-1 Location, except the Spokane Valley has about 13 miles of Ecological HCA and about 8 miles of population HCA Class-3 Location. The compressor station is located Rosalia, WA.		

PART B - INSPECTION RESULTS

Date of Inspection: November 28 – December 2, 2011	<input checked="" type="checkbox"/> Gas <input type="checkbox"/> LNG <input type="checkbox"/> Hazardous Liquid	Unit #(s): 15014
PHMSA/State Inspector name and organization: Al Jones / UTC		
Inspection location(s) and facilities inspected: The Rosalia District is located in Eastern Washington with their office at Spokane, WA. The portion of the District inspected include the 36-inch (A-Line) and two 42-inch (B-Line and C-Line) diameter pipelines from the Washington/Idaho border (MP 106.8) to the Spokane Gate Station (MP 108.2). In 2011 about 3,600 linear feet of the A-line located at Saltese Meadows in Spokane Valley was removed and replaced		

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with a new 36-inch diameter pipeline with FBE coating in a Class-3 Location. The A and B Lines extents south from the Spokane Gate to the Snake River (MP 206.7). The Rosalia Compressor Station contains a Mars Solar (14K Hp), Titan Solar (19.5 Hp), and a LM-1500, GE (12.5 Hp) turbines. Meter Stations inspected for set points, lockup, MAOP, and security were located at Spokane, Mica, Spangle, Rosalia, and St. John. The right-of-ways were inspected for signage, cathodic protection test sites, casings, and rectifier units.

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PART C – VIOLATION and CIVIL PENALTY INFORMATION

Information shown in Part C of this Pipeline Safety Violation Report relates to probable violations, proposed compliance orders, and proposed civil penalties

VIOLATION NUMBER #1

Section C1 – Description of Violation

Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii). Enter only one regulation:

192.465 External Corrosion Control: Monitoring.

(d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

Is this a violation of a condition in a Special Permit (Waiver)?

No Yes - identify permit and describe violation: [click here to enter](#)

Describe the operator's conduct that violated the regulation:

The operator agreed that during the annual surveys taken in November for 2010 and 2011, the pipe-to-soil "off" potential difference for the A-Line was less than 100 mV with respect to the native potential.

Describe the evidence:

A-Line data at:

MP 110.2 the native potential is -0.698V and P/S for 2010 was -0.669V and for 2011 was -0.748V.

MP 110.8 the native potential is -0.708V and P/S for 2010 was -0.640V and for 2011 was -0.792V.

Person(s) interviewed (include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation):

Kurt Smith, Compliance Specialist and Rick Christman, Corrosion Specialist & NACE Level II. Rick assumed responsibilities in November 2011 as corrosion specialist for the Rosalia District and was aware of this data.

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Comments of person(s) interviewed regarding the violation (include names of any witnesses to the conversation):

Rick has been working to understand the history of the low CP values and analyzing seasonal effects on the data. I reviewed his data and agree that the native values need to be verified. GTN did not remediate the low C/P data from the August 2010 survey and began taking action August 2011 to identify the problem.

NATURE

Describe the nature of the violation in terms of: activities (conduct of activities such as inspections, tests, preparing procedures, maintenance, meetings, notifications, reports); or equipment/facilities (such as safety equipment not installed, missing, defective or inoperative); or records (identify the missing records or the records that were reviewed):

No records were available to review what remediation action GTN took after the August 2010 survey to correct the low Pipe-to-Soil reading at Mile Posts 110.2 and 110.8.

CIRCUMSTANCES

Describe who discovered the violation (operator, PHMSA, public) and the duration of the violation:

During the PHMSA inspection, GTN agreed that a potential violation was possible.

GRAVITY

Gravity relates to the seriousness of the probable violation, and includes consideration of whether it posed a significant threat to public safety and protection of the environment and where this threat occurred.

Enter the number of instances of the violation:

There were two instances identified for 2010 and 2011.

<i>Non-IM Violation Only</i>	1	<input type="checkbox"/>	The non-compliance affected the operator's emergency response capability
	2	<input checked="" type="checkbox"/>	The non-compliance had a minimal effect on pipeline integrity or safe operation of the pipeline and did not pose a significant threat to public safety or the environment
	3	<input type="checkbox"/>	The non-compliance posed a significant threat to pipeline integrity or safe operation of the pipeline, or if left uncorrected would likely pose such a threat
	4	<input type="checkbox"/>	The location of the noncompliance in items 2 and 3 (above) was in or affected a populated area, an HCA, an HCA "could affect" segment, a road or RR crossing,
<i>Select all that apply</i>			

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	5		a plant/station, or similar area <input type="checkbox"/> The non-compliance was a causal factor in, or contributed to the cause(s) of, a reportable accident/incident.
	6		<input type="checkbox"/> The non-compliance contributed to increasing the severity of the consequences of a reportable accident/incident
	7		<input type="checkbox"/> The non-compliance was a causal factor in a minor (non-reportable) release of product
For selection 3 (above) describe the potential impact of this violation on <u>public safety</u> ? click here to enter			
For selection 3 (above) describe the potential impact of this violation on the <u>environment</u> ? click here to enter			
<i>IM Violation only</i>	Enter the Area Finding & Risk Category data: <ul style="list-style-type: none"> • Area Finding: click here to enter • Risk Category (A-E): click here to enter 		

Section C2 – Consequences of an Accident/Incident

<i>Select all that apply</i>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	There was no accident/incident (continue to Section C3) The event was reportable (§ 191.3 or § 195.50) regardless of whether it was reported by the operator. One or more persons were evacuated. How many?: click here to enter A cleanup of the resulting environmental damage was required. One or more persons were injured and transported to a medical facility (regardless of whether as in-patient or out-patient). How many?: click here to enter One or more fatalities. How many?: click here to enter Other: Describe: click here to enter
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<u>Section C3 – Additional Considerations</u>		
	<input checked="" type="checkbox"/>	A civil penalty is not proposed for this violation (continue to Section C4).
<u>CULPABILITY</u>		
<i>This civil penalty assessment consideration is based on how culpable - or blameworthy – the operator is for the non-compliance.</i>		
<i>Culpability does not consider actions taken by the Operator after PHMSA has discovered the noncompliance.</i>		
<i>Select one</i>	<input checked="" type="checkbox"/>	<p>The operator failed to take any action to comply with a regulatory requirement that was clearly applicable to its facility.</p> <p>Describe: No records were available to review what remediation action GTN took after the August 2010 survey to correct the low Pipe-to-Soil reading at Mile Posts 110.2 and 110.8.</p>
	<input type="checkbox"/>	<p>The operator made a minimal attempt to comply.</p> <p>Describe: click here to enter</p>
	<input type="checkbox"/>	<p>The operator was cognizant of the regulatory requirement and took some steps to address the issue, but did not achieve compliance.</p> <p>Describe: click here to enter</p>
	<input type="checkbox"/>	<p>The operator was cognizant of the regulatory requirement and took significant steps to address the issue, but had some degree of justification for not taking all practicable steps to achieve compliance at its facility.</p> <p>Describe: click here to enter</p>
	<input type="checkbox"/>	<p>The operator was diligent in taking all practicable steps to comply but failed to achieve full compliance for reasons such as unforeseeable events/conditions that were partly or wholly outside its control; or the operator is a small or new operator in the process of building and strengthening its compliance program, or similar reasons.</p> <p>Describe: click here to enter</p>

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GOOD FAITH				
<i>This civil penalty assessment consideration is based on the reasonableness of an operator's understanding of the cited regulatory requirement</i>				
<i>Select one</i>	<input checked="" type="checkbox"/>	GOOD FAITH exists if there is more than one reasonable interpretation as to how to implement the requirement at the facility and the operator had a credible belief that its approach was faithful to its duty to meet its obligation. Describe: The operator stated that the data for the native values need to be verified.		
	<input type="checkbox"/>	GOOD FAITH does not exist if there is guidance publicly available to operators on the subject and the operator did not act in accordance with the guidance, the operator failed to follow the only accepted industry practice, or if there is only one manner of implementing the requirement at the facility sufficient to accomplish the purpose of the requirement and the operator did otherwise. Describe: click here to enter		
Additional Comments applicable to civil penalty (Optional)				
<i>(including other matters as justice may require and economic benefit gained from noncompliance)</i>				
Describe: click here to enter				
Section C4 – Proposed Action				
<i>Select one</i>	<input type="checkbox"/>	Civil penalty	<input type="checkbox"/>	Civil penalty and compliance order
	<input type="checkbox"/>	Compliance order	<input checked="" type="checkbox"/>	Other - describe: The operator need to complete a comprehensive evaluation and remediate the less than 100 mV values for the difference in the pipe-to-soil “off” potential and its native potential for the A-Line near MP 110. The remediation should be completed and a field follow-up verification within six months.

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PART D HISTORY of PRIOR OFFENSES

(complete this section only if at least one of the violations in this case
has a proposed civil penalty)

(Prior offenses for the 5 year period prior to the estimated date of this Violation Report's Notice letter)

Date of Final Order	CPF #	What type of enforcement action(s) (CO, CP) are in the Final Order ?	Number of offenses in Final Order	Identify the regulation(s) violated (Part, Section, and specific Paragraph)
click here	click here	click here	click here	click here
click here	click here	click here	click here	click here
click here	click here	click here	click here	click here
click here	click here	click here	click here	click here

Press TAB in the cell above to add rows

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Inspector's signature & organization

Date: December 28, 2011

Al Jones / UTC

PHMSA Region Director's signature

Date:

(Rev. 4/2010)