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	110016			
Inspector Name & Submit Date	Stephanie Zuehlke 07.06.11	17. 1		
Chief Eng Name & Review/Date	Joe Subsits – 7/7/2011			
	Operator Informatio	n		
Name of Operator:	NWN		OP ID #: 13840	
Name of Unit(s):	Columbia Gorge			
Records Location:	Portland, Oregon		A	
Date(s) of Last (unit) Inspection:	September 29, 2008 through October 10, 2008	Inspection Date(s):	June 13-16 & 21-22,	2011

Inspection Summary:

HQ Address:

Zane White

Northwest Natural provides natural gas service to North Bonneville, White Salmon/Bingen, N. Dallas Port, Carson, Klickitat, and John Dav.

System/Unit Name & Address:

503.226.4211. Ext 5421

Completed Forms for this inspection are Form C Std. Inspection Nat. Gas. Distr., D&A mini form, and QA mini form.

Northwest Natural Gas C			1125 Bargeway Rd.			
220 Northwest Second As	venue		The Dalles, OR 97058			
Portland, Oregon 97209						
G 000 11)/ C /)/			700.004.101.		
Co. Official:	Mr. Grant M.		Phone No.:	503-226-4211		
Phone No.:	Vice President	-	Fax No.:			
Fax No.:	503-226-4211	Ext. 2374	Emergency Phone No.:			
Emergency Phone No.:	503-273-4822			800-800-422-4012		
	800-800-422-4	1012				
Persons Intervi	ewed		Title	Phone No.		
James Grege	er	Welding Inspection/Qualifications Assurance		503.226.4211 c-503.329.3974		
Darlene T. Ma	urer	Code Compliance Eng. Svcs		503.226.4211		
Dakota Duncan,	J.D.	Complia	nce Specialist	503.226.4211		
Sheri L. Clar	·k	Clark Co	ounty Engineer	360.571.5465		
Yogi Rattay	/	Field Operations & (Customer Field Svcs Supv.	503.816.9048		
Gary Hyatt		Damage P	revention Supv.	503.226.4211 Ext. 4320		
Cari Colton		Manager Opera	tions Technical Svcs.	503.226.4211 Ext 5759		
Scott Lundgr	en	Station D	esign Engineer	503.226.4211 Ext 4355		
Glenn Carlso	n	Engineer (Oc	dorizer Discussion)	503.226.4211 Ext 4816		
Margaret Locke		Code Com	pliance Engineer	503.226.4211 Ext 4306		
Kerry Shamp	ine	Mgr. Co	de Compliance	503.22.4211 Ext 4340		
Doug Marti	n	Leakag	ge Supervisor	503.226.4211 Ext 4427		
Ron Martin	1	Compliance Supv – C	orrosion - Compliance Svcs	503.226.4211 Ext 4381		

WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the

HR Consultant

	last inspection. This checklist focuses on Records and Field items per a routine standard inspection.						
l	(check one below and enter appropriate date)						
	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:	Week of March 12th, 2007				

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.

		GAS SYST	TEM OPERATIONS	
Gas Supp	plier Williams Natural Gas			
Services: Residentia	2011: All of WA no way to break out this Commercial Industrial	s inspection area Other	= 65,821	
Number o	of reportable safety related conditions last ye	ear 0	Number of deferred leaks in syst	em 3 Active C Leaks as of May 20, 2011.
Number o	of non-reportable safety related conditions la	ast year 0	Number of third party hits last ye	ear 55 in WA – all areas
	transmission pipeline within unit (total miles 4 areas) No Transmission in Gorge Distri			unit(total miles and miles in class 3 & 4 requested # above prior to end of inspection thin this inspection unit.
Operating Pressure(s):			MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	North Bonneville, White Salmon/Bingen, Dallas Port, Carson, Klickitat, John Day		60psig 160psig 250psig 60psig 250psig 250psig	40psi 147psig 185psig 41psig 82psig Static w/nitrogen NWN identified Dave Lykken informed the first time (Letter 10.14.2008 purged and nitrogen) JD taken out of service – put back into service – taken out of service and with nitrogen on it since Aluminum plant defunct. June 1, 2011.
Town:	Distribution Standard Delivery		Less than/equal to 60 psig	Less than/equal to 60 psig
Other:				
Does the	operator have any transmission pipelines?	None in this D	istrict	
Compress	sor stations? Use Attachment 1.	None in this D	istrict	

Pipe Specifications:			
Year Installed (Range)	1950 to 2010	Pipe Diameters (Range)	½ inch thru 8-inch
Material Type	PE & Steel	Line Pipe Specification Used	API 5L, PSL 2 Steel Pipe
Mileage	See Annual Report	SMYS %	< 20% SMYS

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** 07.07.11 Completed in Field 06.22.11

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

PART 199 Drug and Alcohol Testing Regulations and Procedures			U	NA	NC
Subparts A – C PV under 199.113(b), 199.113(c) and 199.241	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection. See Form #13 for Questions remaining. Posting in employee break room shows 24-hr service number as 800.654.9778 – this number is		х		

valid. NWN D/A Policy shows the number WA 800.255.5255- Policy number is			
invalid. Plan dated August 2001. Copy of plan page in policy.	<u></u>		

		REPORTING RECORDS	S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. 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. Include operator contact information with all updates.	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?	х			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at http://www.nrc.useg.mil/nrchp.html , and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. None	x			
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov at unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	х			
5.	191.15(a)	30-day follow-up written reports to PHMSA (Form F7100.2) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov	х			
6.	191.15(c)	Supplemental report (to 30-day follow-up)	х		,	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2011 for the year 2010).	х			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov 013840	х			
9.	191.23	Filing the Safety Related Condition Report (SRCR)	х			
10.	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery	х			
11.	.60 5 (d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions (d) Safety-related condition reports. The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter. SPW-005	x			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections None	X			
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports None	х			
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; None	х			
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars;	х			
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	х			
18.	480-93-200(1)(d)	The unintentional ignition of gas;	х			
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	х			
20.	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;	х			
21.	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;	х			

_		REPORTING RECORDS	S	U	N/A	N/C
22.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;	х			
24.	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;	х			
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or None	х			
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	х			
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	х			
29.	480-93-200(4)(b)	The extent of injuries and damage;	x			
30.	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;	х			
31.	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;	х			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	х			
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	x			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	х			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	х			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	x			
37.	480-93-200(4)(j)	Line type;	x			
38.	480-93-200(4)(k)	City and county of incident; and	x			
39.	480-93-200(4)(1)	Any other information deemed necessary by the commission.	x	1	 	†
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	х			
41.	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	х			
42.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year		110		
43.	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			
44.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;			1 5	
45.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field;	х			
46.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and 5	х			
47.	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; = 1 (C) Excavated prior to a locate being conducted; or = 4 (D) Other.	х			

		REPORTING RECORDS	S	U	N/A	N/C
48.	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. Requested documentation on material failure for 541 El Camino Real, White Salmon — Asset register and scheduling form states that Cause of Leak is Faulty Material or Weld on poly/ABS service. Darlene identified damage and not a material failure. Why changed from material failure to damage? In review of 541 change in documentation from mtl. Failure to damage the correction makes sense to me and appears to be a clerical error only and possibly requiring clerical staff training or field staff clearly documenting issue. Identified to NWN that if they change a record (as they did in this case) they need to identify why, by whom and when.	x			
49.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities – No changes	х			
50.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	х			
51.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	х			

Comments:	

	CUSTOMER a	and EXCESS FLOW VALVE INSTALLATION NOTIFICATION	S	U	N/A	N/C
52.	192.16	Customer notification - Customers notified, within 90 days, of their responsibility for those service lines not maintained by the operator Auto generated for new customers – list is available.	х			
53.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? SPW 381 dated 12.09.10	х	·		
54.	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? SPW 382-3	х			

Comments:	
Definition: SPW = Standard Practices of Washington	

		CONSTRUCTION RECORDS	S	U	N/A	N/C
55.	480-93-013	OQ records for personnel performing New Construction covered tasks Steve Dean Mechanic Welder: API 1104 Journeyman 3/4"-24" gas pipe. 2" smaller of all welders since 2009.	x			

		CONSTRUCTION RECORDS	S	U	N/A	N/C
56.	192.225	Test Results to Qualify Welding Procedures In service fillet qualifications are new.so qual less than one year. Reviewed 01.03.11 and 05.06.10. Procedure 03.26.10. North Bonneville. Hot Springs Rd. Construction section above: Weld Procedure 121 (Adopted: June 13, 2006) on 02.23.09 4" Butt-weld. Project 3300893 Oregon WA Labs foro 3 rd Party NDT. SPW 221.3	x			
57.	192.227	Welder Qualification API 1104 The Dalles employees. Travis Davis, Scott Ellickson, Armondo Quintaro, Nail Rubblke, John Walker. Reviewed Neal Rubblke (less than 2") records for Oxy/Acet.02.08.11/08.11.10 Polyfusion incl. Butt/coupling/ 02.08.11/0811.10: Mechanical Connections 02.08.11/08.11.10	x			
58.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) Steve Dean is only welder	х			
59.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months) Semi annual	х			
60.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period none	х			
61.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) Semi annual	х			
62.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 cald-weld test leads.	х			
63.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains None installed/completed since 2009. Reviewed SPW 1603.4.4.3 for PE install in metal and/or Poly casing. Check procedures for install of seals (NWN=boot gasket) for steel casing. CFM 615-8 Casings.	x			
64.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services SPW 1603.4.4.3 for PE install in metal and/or Poly casing. This procedure is for main and services for PE.	х			
65.	192.241(a)	Visual Weld Inspector Training/Experience OQ procedure are the on-site procedures – Reviewed Oxy/A OQ OP-F-161-01. Reviewed Oly Acet Procedudre. CFM 606-2	х			
66.	192.243(b)(2)	Nondestructive Technician Qualification Reviewed contractor Oregan WA Labs is contractor.	х			
67.	192.243(c)	NDT procedures Reviewed procedures for Oregon Washington Labs.	x			
68.	192.243(f)	Total Number of Girth Welds On pipeline <20% SMYS - 10 girth Welds at North Bonneville. Hot Springs Rd. Construction section above: Weld Procedure 121 (Adopted: June 13, 2006) on 02.23.09 4" Butt-weld. Oregon WA Labs foro 3 rd Party NDT.	x			
69.	192.243(f)	Number of Welds Inspected by NDT 2- 4" linestoppers (bottomouts) 4-1" sav-a-valves. 1-4" Girth at only steel weld above 2" in size.	х			
70.	192.243(f)	Number of Welds Rejected none.	х			
71.	192.243(f)	Disposition of each Weld Rejected None	х			
72.	.273/.283	Qualified Joining Procedures Including Test Results Reviewed PE procedures	' x			
73.	192.303	Construction Specifications	х			
74.	192.325 WAC 480-93- 178(4)(5)	Underground Clearances SPW 15060psig for and SPW 160 for =60psig</td <td>х</td> <td></td> <td></td> <td></td>	х			
75.	192.327	Amount, location, cover of each size of pipe installed Reviewed procedures for above - okay	х			
76.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length None since 2009	х			
77.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: None since 2009	x			
78.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; None since 2009	х			
79.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. None since 2009	x			

		CONSTRUCTION RECORDS	S	· U	N/A	N/C
80.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed None since 2009	х			
81.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; None since 2009	х			
82.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. None since 2009	х			
83.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; none since 2009	x			
84.	480-93-160(2)(g)	Welding specifications; and None since 2009	х			
85.	480-93-160(2)(h)	Bending procedures to be followed if needed. None since 2009. No bending allowed for NWN.	х			
86.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ 20% SMYS? None since 2009	х			
87.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) Reviewed pressure tests for North Bonneville job and White Salmon Mains - 2.	х			
88.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? CFM 605.2 Testing New Class C and higher Pipeline Hydro less than 30% SMYS min. 900psi w/ duration min. 1 hour. Test for 03.02.09 N. Bonneville replacement. Procedure for testing is SPW 504.3.2. Barry Smith (Title: Transmission Line 2 possible training issue: test docs for above identify pipe as X-52 rather than x-42 also on the chart. The difference in the root pass on x-42 and x52 is 3/16" and 1/8" the amperage difference also. OQ records for Smith: B: 0-60 C: 61-175. SPW 511.3.5(3)	x			
89.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) SPW 737 Table 2 Ashcroft gauges require calibration @ `12 months. Reviewed Pressure Test Gauge Calibration Report dated 05.31.11. Chart box calibration records for North Bonneville main installation: need unique name/# to prove that has been calibrated. Darlene identified that present policy is going to be changed to include unique # to tie back to construction project. NWN in WA has only 2 chart boxes. Both have been calibrated. SN# 4806337 Foxboro: 12" 1 pen chart recorder and SN# 45-4610 Meriam - both 3000psig. Cautioned that range of recorder should be able to record detail based upon pressure test. Dates of recal okay.	x			
90.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig None.	х			
91.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig None. SPW 635 includes info on requiring leak survey, et.	х			

Comments:		

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
92.	192.517(a)	Pressure Testing (operates at or above 100 psig) — useful life of pipeline North Bonneville 4" reviewed test pressure records.	х			
93.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years Reviewed test pressure records for 1265 N. Main St., White Salmon; 457 NE Hood St., White Salmon	x			

	· · · ·	OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
94.	192.605(a) PV	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09 NWN installs Plidco fittings but does not have a procedure for the installation. NWN has a procedure that incorporates mech fittings and calls out many types but Plidco type fittings are not included. NWN identified they follow the manufacturers instructions that come with the fitting and they also identified that they weld their Plidco for permanent install. Construction Field Manual (CFM) CFM 603-1 Titled Mechanical Repairs.		x		
95.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel Reviewed how they access information – it is in real time and laptops are available to all in field	x			
96.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? The only installs in 2009, 2010, and 2011 to date. Services: 04.29.11installed and platted -291 Vada Rd., in Skamania County 02.18.11 install & Platted - 946 Oak Ave. in Klickitat County 03.22.11 install & Platted - 200 Hill Ave., in Klickitat County Main: 04.01.10 install & 04.19.10 1265 - N. Main St., White Salmon; 10.21.09 install & Platted 01.22.10 - 457 NE Hood St., White Salmon	x			
97.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures Reivew through OQ program with testing at different intervals plus the construction inspection completed by the District construction supervisors & OQ Dept.	х			
98.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures: safety meetings completed semi-monthly where discussions of personnel response is completed re: abnormal operation procedures are addressed. They are providing copies of two of their safety meetings as examples. Process for Engineering coordinators audit pre and post construction projects.	x			
99.	192.609	Class Location Study (If applicable) Not applicable all distribution below threshold.	х		· ·	
100.	192.611	Confirmation or revision of MAOP Not applicable all distribution below threshold.	х			
101.		Damage Prevention (Operator Internal Performance Measures)				
102.		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) SPW 605 Substructure Damage Control Program. QA for locating work via sampling. And focuses on random review of accuracy and root cause analysis.	x			
103.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? Combination 85% contract and 15% company w/same QA program for both. No penalty or incentive. 5 hits in 2010 4 failure to notify and 1 contractor error.	х			
104.	192.614	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? Contractor quality review board and discuss. Contractor is separate and NWN receives information regarding how they have handled issues. NWN reviews own.	х			
105.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? Annually review all elements including procedures and associated AOC and the assessment methods themselves. Not limited to once per year but revise as necessary.	x			
106.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations	х			
107.	-	regulations. Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Reviewed dig tickets – okay completed prior to required date. All available online to check any locater.	x			

	OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
108.	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements? Tracked in company database mgmt. OQ'd people.	x			
109.	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? Standby for high pressure and excav is informed prior. Class C and higher is considered highpressure. Gary discussed procedure utilized to determine.	х			
110.	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 Nation DIRT yes. UTC Dirt – No. https://identity.damagereporting.org/cgareg/control/login.do Y x N x	x			

Comments:		 · •• · · · · · · · · · · · · · · · · ·	

111.		Emergency Response Plans	S	U	N/A	N/C
112.	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	х			
113.	192.615(b)(1)	Location Specific Emergency Plan There is one copy of the plan located in the office accessible Reviewed Eplan dated March 7, 2011 paper copy in Corp Office and June 7, 2011 on computer files are located in company access. file server	х			
114.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training (3) Review employee activities to determine whether the procedures were effectively followed in each emergency. Recognition of AOC Scenario based training. Emergency response training in classroom and then to site to respond to mock training. Requested records to show that employees training has been reviewed. No table tops have been completed for WA.	х			
115.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Requested records to show that employees training has been reviewed.	х			
116.	192.615(c)	Liaison Program with Public Officials Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to: (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency; (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and, (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property. Completed and included in their Emergency Plan. Reviewed 2010 P/A information – All kept in a 3-ring binder that identified each contact and item sent to each stakeholder audience.	x			

117.	192.616	Public Aware	eness Program			
118.	192.616(e&f)	Documentation properly and adequately refl Awareness Program requirements - Stakeho and content, delivery method and frequency evaluations, etc. (i.e. contact or mailing rost audience contact documentation, etc. for em superintendents, program evaluations, etc.). Program change at NWN2010 to become m Emergency and public officials. Cari Colton responsibilities including spending most effe	Ider Audience identification, message type, supplemental enhancements, program ers, postage receipts, return receipts, ergency responder, public officials, school ore effective in training cooperatively with became Mgr. of this section as well as OQ	x		
119.		Operators in existence on June 20, 2005, mulater than June 20, 2006. See 192.616(a) and The Dalles Regional Training December 15.				
120.		API RP 1162 Baseline* Reco	mmended Message Deliveries			
121.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)			
		Residence Along Local Distribution System	Annual Welcome packet, bill stuffers, envelopes, on-hold msgs, and news letters.			
		LDC Customers	Twice annually Welcome packet, bill stuffers, envelopes, on-hold msgs, and news letters.			
		One-Call Centers	As required of One-Call Center Okay.			
		Emergency Officials Fire and Police incl. volunteer FD where offer training to them.	Annual See above for an example. External and internal.			
		Public Officials	3 years NWN 2010 Pipeline P/A Plan states: Baseline plan says they will coordinate personal contacts. They provided Sheriff Dept contact info.			
		Excavator and Contractors	Annual okay			
		Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)			
		Residence Along Local Distribution System	2 years N/A			
		One-Call Centers Emergency Officials	As required of One-Call Center N/A Annual N/A			
		Public Officials Excavator and Contractors	3 years N/A AnnualN/A			
122.		* Refer to API RP 1162 for additional requirecommendations, supplemental requiremen	rements, including general program			
123.	192.616(g)	The program conducted in English and any	other languages commonly understood by a operator's area. Spanish. Although they have	x		

124.	.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. 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 June 20, 2010616(h) Requested review of first evaluation. NWN completes an Annual review – completed entirely in-house. 2010 Public Safety Awareness Plan Summary 02.23.11 See Below: 1. 2010 Public Safety Awareness Plan Summary completed on 02.23.11 - Plan Eval. In folder (States 2010 marked the sixth consecutive year of the NWN public safety awareness plan in step with RP 1162 guidelines. 2. 2009 Public Safety Awareness Plan Summary completed on 03.15.10 – Plan Eval. In folder	x		
125.	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.	х		
126.	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 and leak response records (PHMSA area of emphasis) (NTSB B.10) None.	х		

Comments:	
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127.	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) And process exists for change/uprate/capacity increase, etc. and goes back to design. Gas control is the only group that can change capacity. Requested information on Bengen R-14 relief Fisher Model 1805-P set at 57psig in 08.05.10 set at 61psig on 05.02.11. to allow for proper build-up for relief at full open capacity. Pilot operated 2" reg. so relatively no build-up. Reviewed R-01 and R-02 – same pilot operating Fisher 620.	x		
128.	480-93-015(1)	Odorization of Gas – Concentrations adequate Odorizer location documentation in folder: Carson Bingen/White Salmon; N. Bonneville; Dallesport; Klickitat;, and John Day. Requested maintenance & fill records for the above odorizers. Reviewed Month End Odorant Activity Report January, February, and March 2011 for all Odorizers.	x		
129.	480-93-015(2)	Monthly Odorant Sniff Testing Reviewed Monthly test locations and test records 2009-2011May for Carson; Bingen/White Salmon, Klickitat, and Dallesport. NWN has an Odorizer engineer reviews/evaluates on annual basis and responds to issues – also automatic alert (unknown whether telemetry utilized)	x.		
130.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements None reported see above for additional review.	х		

	480-93-124(3)	705 and 721 – procedure 721 states "Determine the necessity for additional patrols by the severity of the conditions that could cause failure or leakage and the consequent	x			
	480-93-124(3)	hazards to public safety" Reviewed 3 locations: noted that the N. Bonneville bridge xing	×			
133.		newly installed on 03.2009. Okay. Markers reported missing or damaged replaced within 45 days? Tracked in electronic				
155.	480-93-124(4)	system called advantica to report missing in the field but they carry markers on vehicles	х			
		and replace immediately usually.				
134.		Service regulators and associated safety devices tested during initial turn-on CFM 701-6 Electronic records for testing records Person completing test included in				
	480-93-140(2)	data as crew code – Darlene examples of how they track tester/installer name.: Reviewed	х			ĺ
		several installation records for 2010.				
135.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None 2009 to present.	х			
136.		Reported gas leaks promptly investigated? Graded in accordance with 480-93-186?				
:		Records retained? Check the 3 Active C Leaks as of May 20, 2011. Procedure SPW				
		603: 161 NW Spring St #W, White Salmon, WA 98672 02/12/2010 07:50 AM				
1		02/12/2010 07:54 AM 02/12/2010 09:33 AM 01:43 Response time. Review this				
		record for prompt response – emergency sickness				l l
		Late 2010 cross training took place for service and construction staff so both could respond to odor calls. I see that there were approx 5 A06 responses over 1 hr in				
		2011 NWN identified that they complete an internal audit for review of exceeding 2				
		hr response time. Employees that received this late 2010 emergency responder				
		training. Larry Bradley; Travis Davis; Armando Quintero, Neal Rubbelke; John Walker				
		541 El Camino Real, White Salmon: NWN identified that when they respond to a				
	480-93-185(1)	leak if it is an Grade A leak (classified as hazardous) it is graded immediately. If the leak is a Grade B leak or Grade C leak (classified as non-hazardous leak) it is graded		x		
	PV	by the leakage inspector after the fact. I identified that a leak identified on 12.23.10				1
		as a non-hazardous leak and by Travis davis and graded by Blair Grimmer on				
		01.04.11. Kerry identified that leak grading time frame not identified in code section – I mentioned that if staff is OQ'd in leak detection they need to grade				l
		immediately – if they are not OQ'd to grade a leak then they should not be				
		responding. This grading is not prompt. Applicable code section follows:				
		(1) Each gas pipeline company must investigate any odor, leak, explosion, or fire, which may involve its gas pipelines, promptly after receiving notification.				
		Where the investigation reveals a leak, the gas pipeline company must grade		!		
		the leak in accordance with WAC 480-93-186, and take appropriate action.				
		The gas pipeline company must retain the leak investigation record for the life of the pipeline.				
	I	Copies of OQ procedure and Addendum for leak classification in folder.			1	
		To provide the Contract of the	I		 	
		No documentation showing that 1st responder classified the leak hazardous or non-		i		
137		No documentation showing that 1 st responder classified the leak hazardous or non-hazardous.				
137.		No documentation showing that 1st responder classified the leak hazardous or non-				
137.	480-93-185(3)(a)	No documentation showing that 1 st responder classified the leak hazardous or non-hazardous. Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; Reviewed procedure SPW 603-3.4 Foreign Leaks. Reivewed docs 2009/10/11. NWN appears to exceed	x			
137.	480-93-185(3)(a)	No documentation showing that 1 st responder classified the leak hazardous or non-hazardous. Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; Reviewed procedure SPW 603-3.4 Foreign Leaks. Reivewed docs 2009/10/11. NWN appears to exceed requirements by over reporting – report include some nat gas along with the foreign	x			
137.	480-93-185(3)(a) 480-93-185(3)(b)	No documentation showing that 1 st responder classified the leak hazardous or non-hazardous. Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; Reviewed procedure SPW 603-3.4 Foreign Leaks. Reivewed docs 2009/10/11. NWN appears to exceed	x			

				,	 1
139.	480-93-186(3) PV	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? Check the 3 Active C Leaks as of May 20, 2011. Leak evaluations: 3 leaks 1. 185 W. Jewett, White Salmon a. Perimeter of leak not established and leak perimeter not evaluated using a CGI per 186(3) and equip. used b. Leak perimeter not established/documented per 186(2) c. Leak estab. 2003 graded as a C (NTE 15 months).? d. Obtaining 2003 through present providing leak docs these are incomplete e. Gas reads are identified as range on computer forms – not allowed f. Magnitude and location of CGI readings left (bar hole not identified) g. Regraded each time? 2. 7th St. & Oak St., White Salmon a. Leak estab 1983 b. Obtaining 1983 through present providing leak does these are incomplete c. NTE exceeded. No read btwn 4.20.87 and 05.04.89. d. Gas reads are identified as range on computer forms – not allowed e. Magnitude and location of CGI readings left (bar hole not identified) f. Re-graded each time? 3. Franklin & Ash, Bingen a. Retired as a leak – service still active. b. Leak estab 1997 c. Obtaining 1997 through present providing leak does these are incomplete d. NTE exceeded. No read between 03.30.98 and 07.08.99. e. Gas reads are identified as range on computer forms – not allowed f. Magnitude and location of CGI readings left (bar hole not identified) g. Re-graded each time? 4. 541 El Camino Real, White Salmon a. Perimeter of leak not established and leak perimeter not evaluated using a CGI per 186(3) b. Leak perimeter not established/documented per 186(2) c. 30 day residual read taken Equipment SN provided but no residual gas read taken. Completed – okay. d. Gas reads are identified as range on computer forms – completed okay		x	
		e. Magnitude and location of CGI readings left (bar hole not identified) completed - okay			
		f. Re-graded each time? Completed okay.			
140.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? Check the 3 Active C Leaks as of May 20, 2011. None downgraded.	x		

133 (1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the person conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron); (8) Pipe condition; (9) Type of repair; (10) Leak cause; (11) Date pipe installed (if known); (12) Magnitude and location of CGI readings left; and (13) Unique identification numbers (such as serial numbers) of leak detection equipment. See above #139 for (1)-(13) details. Gas leak surveys Requested 3 service okay, and 3 main locations requested-2 cycles Services: Plat 1001109 03.17.04 and 05.15.09 Plat 1016177 04.08.04 and 05.14.09 Plat 10101109 05.07.03 and 06.25.08 Plat 10011140 04.024.03 and 06.26.08 Plat 4011174 04.17.03 and 06.26.08 Plat coll of the cycle of the	141.		Gas leak records: at a minimum include required information listed under 480-93-187(1-				
name of the person conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., pipe, tee, flange, valve); (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. See above #139 for (1)-(13) details. Gas leak surveys Requested 3 service okay, and 3 main locations requested-2 cycles Services: Plat 1001109 03.17.04 and 05.15.09 Plat 1001109 03.17.04 and 05.14.09 Plat 1016177 04.08.04 and 05.13.09 Mains: Plat 1001109 05.07.03 and 06.25.08 Plat 1001140 40.24.03 and 06.25.08 Plat 1001144 04.024.03 and 06.26.08 Plat 4011174 04.17.03 and 06.26.08 Plat 4011174 04.17.03 and 06.26.08 Plat 1001140 cxced 45 days) F1 calibration requirement per procedure SPW 737 require accuracy/calib test weekly NTE 90 days. Maintenance guidelines required if calibration failure. Units used for leak survey: 8546-3; 9079-5; and 1018Z (reviewed weekly calib records) There are 3 CGI units in the Dalles used by Svc techs and construction staff: NWN – reviewed all of NWN CGI Trak it III calib records. Looks okay 9 units reviewed for 2009 to date.			1 /				
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(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. See above #139 for (1)-(13) details. 142. Gas leak surveys Requested 3 service okay, and 3 main locations requested-2 cycles Services: Plat 1001109 03.17.04 and 05.15.09 Plat 1003144 03.25.04 and 05.14.09 Plat 1016177 04.08.04 and 05.13.09 Mains: Plat 1001109 05.07.03 and 06.25.08 Plat 4011174 04.17.03 and 06.26.08 Plat 4011174 04.17.03 and 06.26.08 Plat 4011174 04.17.03 and 06.26.08 FI calibration requirement per procedure SPW 737 require accuracy/calib test weekly NTE 90 days. Maintenance guidelines required if calibration failure. Units used for leak survey: 8546-3; 9079-5; and 10182 (reviewed weekly calib records) There are 3 CGI units in the Dalles used by Svc techs and construction staff; NWN — reviewed all of NWN CGI Trak it III calib records. Looks okay 9 units reviewed for 2009 to date.		PV			^		
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NWN – reviewed all of NWN CGI Trak it III calib records. Looks okay 9 units reviewed for 2009 to date.		100-75-100(2)	Units used for leak survey: 8546-3; 9079-5; and 10182 (reviewed weekly calib records)	×	1	1	
for 2009 to date.							
					!		
			for 2009 to date.	L	L		
144. 480-93-188(3) Leak survey frequency (Refer to Table Below)	144.		Leak survey frequency (Refer to Table Below)				
PV Leak survey requeries (Refer to Table Below)	L	l PV	The second of th		<u></u>		

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.

Business Districts (implement by 6/02/07)	1/yr (15 months)
High Occupancy Structures	1/yr (15 months)
Called Special Building Survey See Below	Reviewed equipment SN for survey (contractor)
Pipelines Operating ≥ 250 psig	1/yr (15 months)
Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)

HO/Special Building Survey

Requested the following survey maps for review:

- 1. #351 Hot Springs Rd., Carson for 04.23.09 & 05.11.10 3 services
- 2. 450 Main St. & Pool, White Salmon for 04.14.09 & 05.11.10 2 services
- (5) Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:
- (a) Description of the system and area surveyed (including maps and leak survey logs);

NWN was unable to identify whether they kept historical records of their building surveys for the date it was performed. The maps identify a special building icon in the current maps that each surveyor can utilize to identify what needs to be surveyed. Some, such as the above Carson address has 3 separate services.

Business District Survey Docs requested the following for review.

PlatID: 1-002-145 RMLD Serial Number: N/A FI Serial Number 1: POR-F6b - 9079-5

04/23/2009 b2g Grimmer, Blair TOHOMISH ST (ALLEY) | N MAIN ST TO NE WAUNA AV | ALLEY BETWEEN

MAIN ST & CHURCH | NE LINCOLN ST TO E JEWETT BV

White Salmon WA

Inspection

PlatID: 1-002-145 RMLD Serial Number: N/A FI Serial Number 1: SpareF4 - 10182

05/13/2010 b2g Grimmer, Blair TOHOMISH ST (ALLEY) | N MAIN ST TO NE WAUNA AV | ALLEY BETWEEN

MAIN ST & CHURCH | NE LINCOLN ST TO E JEWETT BV

White Salmon WA

Inspection

145.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairsNone	x		
146.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurredNone	х		
147.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected None	х		
148.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions None	х		
149.	480-93-188(4)(e) PV	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 1. 1178 E. Jewitt Blvd., White Salmon 2. 600 Washington St. / 600 Washington St. #1 a. WO # 3310756 is dated 05.17.11 with a basic start date of 06.15.09 and Basic End date of 12.15.09. Explain how these dates correlate to Asset register schedule and tracking form where these dates do not appear. b. 600 Washington St. No % residual reads recorded for cleared leak c. 600 Washington St. #1 no perimeter read on W. side of leak.		x	
150.	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)	х		

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

151.	480-93	-188(6)	allow only for leakage in what occurs in the field. Hazardous (identified by NWN as Class B & C). bar-hole and then contact Each gas pipeline computed detection and recordkee records of the self audit necessary, but not to exceed the self audit necessary. The self audit necessary is the self audit necessary is the self audit necessary is the self audit necessary. Leak survey schedul gas pipelines; (b) Consistent evaluation	Summary identifies that OQ procedures were claspectors to grade leaks A, B, & C. This is con Other than leak inspectors the 1 st respond staff NWN as Class A) and non-hazardous leaks (Contractors do leak surveys including estb. Peter NWN to grade. The summary perform self audits of the effectivene ping programs. Each gas pipeline company must for five years. Self audits must be performed eved three years between audits. At a minimum less meet the minimum federal and state safety ons of leaks are being made throughout the system of leaks are being made throughout the	tradictory from f identify identified by rimeter/CGI use, ss of its leak ast maintain as frequently as a, self audits requirements for	x		
152.	192	.709	Patrolling (Transmission	n Lines) (Refer to Table Below) .705 N/A		x		
	ŀ		Class Location	At Highway and Railroad Crossings	At All Other 1	Places		j
			1 and 2	2/yr (7½ months)	1/yr (15 mor	iths)		ŀ
			3	4/yr (4½ months)	2/yr (7½ moi			
			4	4/yr (4½ months)	4/yr (4½ moi	nths)		
153.	192	.709	Leak Surveys (Transmission Lines) (Refer to Table Below)	.706 N/A	X		
	ı		Class Location	Required	Not Excee	ed		
		•	1 and 2	1/yr	15 month			
			3	2/yr	7½ montl	hs		
			4	4/yr	4½ montl	ns		
154.	192.603(t	o)	Patrolling Business Dist	rict (4 per yr/4½ months) .721(b)(1) SPW 70	03.3.4.	x		
155.	192.603(t	<i>'</i>	_	ness District (2 per yr/7½ months) 192.721(b)(2)	х		
156.	192.603(t)	Leakage Survey - Outsi	de Business District (5 years) 192 .723(b)(1)		х		
157.	192.603(t	o)		3(b)(2) less District (5 years) unprotected distribution lines (3 years)		x		
158.	192.603(1	0)	Tests for Reinstating Se			x		
159.	192.603(t	o)/.727(g)	Abandoned Pipelines; U	Inderwater Facility Reports 192.727		х		
160.	192.709		Pressure Limiting and F Reviewed computer and	Regulating Stations (1 per yr/15 months) .739 anal review.	9 SPW 743-	x		
161.	192.709		Pressure Limiting and F	Regulator Stations – Capacity (1 per yr/15 mor	nths) .743	х		
162.	192.709		Williams capacity doc.	ransmission (1 per yr/15 months) .745 N/A A		х		
163.	192.709		changed between annua info/changes.	istribution (1 per yr/15 months) .747 Set pointle is documented by clicking mapping icon for	newly updated	x		
164.	480-93-10	00(3)		nce (1 per yr/15 months) Reviewed HO/PB va	alve maintenance	х		
165.	192.709		Vault maintenance (≥20	00 cubic feet)(1 per yr/15 months) .749 Non	e.	х		
166.	1 100 100							1
	192. 603((b)	Prevention of Accidenta	al Ignition (høt work permits) .751		x		

168.	192. 603(b)	Welding – Welder Qualification 192.227/.229See above questions 57	x		
169.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2)	х		
170.	192.709	NDT Records (pipeline life) .243(f)	х		
171.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	х		
172.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) N/A	x		

Comments:		

		CORROSION CONTROL RECORDS	S	U	N/A	N/C
173.	192.455(a)(1) AOC	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) PE stg=2yr Requested WSC mill coat exposure limitations & procedures regarding: storage&handling = under 192.479(b), Include as a procedures AOC		х		
174.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) installed prior to operation	х			
175.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) Zero isolated section for 2009/2010/2011. Requested full 10 year review for isolated. Reviewed 216 Steuben St., White Salmon. CP read -1.39mV on 01.27.06	x			
176.	192.491	Test Lead Maintenance .471	х			
177.	192.491	Maps or Records .491(a) Records or maps showing a stated number of anodes, installed in a stated manner or spacing, need not show specific distances to each buried anode. Requested map/list of anodes in White Salmon. (a) Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system. Records or maps showing a stated number of anodes, installed in a stated manner or spacing, need not show specific distances to each buried anode.	x			
178.	192.491	Examination of Buried Pipe when exposed .459	х			
179.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	х			
180.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	х			
181.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Reviewed White Salmon.	х			
182.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) none	х			
183.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c)none	х			
184.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) differential of <-0.250mV to instigate remediation requirements. None.	x			
185.	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. Annual NTE 15mos on Voltmeter. Reviewed 05.24.11 – 81150003 and 81150004.	x			
186.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) None.	х			
187.	192.491	Electrical Isolation (Including Casings) .467 None	х			

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.

		CORROSION CONTROL RECORDS	S	U	N/A	N/C
188.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months 8 Casings Reviewed 2009-2011 all appear read okay.	x			
189.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods None	х			,
190.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days	х			
191.	480-93-110(5)(c)	Casing shorts cleared when practical	х			
192.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months	х			
193.	192.491	Interference Currents .473	х			
194.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)	х			<u> </u>
195.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) reviewed Completed pipe inspections reports. 2011/2010/2009 None.	х			
196.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 None	х			
	192.491 AOC	 yr/15 months offshore) .481 Remediation required under SPW 480 states that coating approved for the location shall be installed but doesn't reference or state what the coating is: Requested info on paint/coating for A/C Paint standard for coating? Requested procedure. Pit guage measurement. 601.3 CFM 12.5% There doesn't appear to be a mechanism in procedures to get from Supv that field staff reports grade 2 & 3 corrosion to, to measure per 192.487 below. Training should be addressed for use of measurement tools. (a) General corrosion. Except for cast iron or ductile iron pipe, each segment of generally corroded distribution line pipe with a remaining wall thickness less than that required for the MAOP of the pipeline, or a remaining wall thickness less than 30 percent of the nominal wall thickness, must be replaced. However, corroded pipe may be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe. Corrosion pitting so closely grouped as to affect the overall strength of the pipe is considered general corrosion for the purpose of this paragraph. SPW 483 identifies above just no mechanism in procedures. 		x		
198.	192.491 AOC	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Coating/paint std. Staff did not find information in NWN Procedures addressing their paint coating standard for remediation of atmospheric corrosion.		х		

Comments:

Requested training certification for Yogi's Drug and Alchol - 60 minute training. Not provided.- PV

·		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
199.	192.161	Supports and anchors	x			
200.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	х			
201.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	х			
202.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	х			
203.	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	х			

		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
		followed.	00-040-00-16-00-16-00	40.		
204.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?	х			
205.	480-93-015(1)	Odorization	х			
206.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	х			
207.	192.179	Valve Protection from Tampering or Damage	х			
208.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	х			
209.	192.463	Levels of cathodic protection	х			
210.	192.465	Rectifiers	Χ.			
211.	192.467	CP - Electrical Isolation	х			
212.	192.476	Systems designed to reduce internal corrosion	х	-		
213.	192.479	Pipeline Components exposed to the atmosphere	х		,	
214.	192.481	Atmospheric Corrosion: monitoring	х			
215.	192.491	Test Stations – Sufficient Number .469	х			
216.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	х			
217.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	x			
218.	480-93-115(4)	Service lines installed in casings/conduit. Are easing ends nearest to building walls sealed?	х			
219.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	х			
220.	192.605	Knowledge of Operating Personnel	х			
221.	480-93-124	Pipeline markers	х			
222.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	х			
223.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	х			
224.	192.195	Overpressure protection designed and installed where required?	х			
225.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	х			
226.	192.741	Telemetering, Recording Gauges	х			
227.	192.751	Warning Signs	х			
228.	192.355	Customer meters and regulators. Protection from damage	х			
229.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	х			
230.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	х			
231.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	x			
232.	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			
233.	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			
234.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No x				
235.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?	х			
236.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?	х			
237.	192.745	Valve Maintenance (Transmission) No transmission this district	1		х	

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

		S [*] √	U	N/A	N/C		
238.	192.747	Valve Maintenance (Distribution)	intenance (Distribution)				
Facility	Sites Visited:						
Facility	Type	Facility ID Number	Location				
							
	<u> </u>						
	• .		· · · · · · · · · · · · · · · · · · ·				
_							

Comments:	,		

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

Number	<u>Date</u>	Subject
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
		Page 21 of 25

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.

ADB-10-04	April 29, 2010	Pipeline Safety: Implementation of Electronic Filing for Recently Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-05	June 28, 2010	Pipeline Safety: Updating Facility Response Plans in Light of Deepwater Horizon Oil Spill
ADB-10-06	August 3, 2010	Pipeline Safety: Personal Electronic Device Related Distractions
ADB-10-07	August 31, 2010	Liquefied Natural Gas Facilities: Obtaining Approval of Alternative Vapor-
ADB-10-08	Navambar 2 2010	Gas Dispersion Models Pinaling Safety Empreson of Proposed Propos
	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or
		Maximum Operating Pressure Using Record Evidence, and Integrity
		Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

For more PHMSA Advisory Bulletins, go to http://phmsa.dot.gov/pipeline/regs/advisory-bulletin

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
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

N/C - Not Checked

239.	.605(b) No	COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
240.	compressor stations this	.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			х	
241.	district.	.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			х	
242.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			х	
243.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			х	
244.]	(b) Tank must be protected according to NFPA #30			x	
245.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			х	
246.		• 50% of the upright side areas are permanently open, or			х	
247.		It is an unattended field compressor station of 1000 hp or less			х	

\sim				
Co	m	m	er	1ts

No compressor stations this district.

	COM	1PRESSOR S	STATION O&M PERFORMANCE AND RECORDS	S	U	N/A	N/C
248.	.709	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)			х	
249.	7	.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)			х	
250.		.736(c)	Compressor Stations – Detection and Alarms (Performance Test)			х	

Comments:	

No compressor stations this district.

		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
251.	.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			х	
252.	No compressor stations this district.	Door latch must open from inside without a key			х	
253.		Doors must swing outward			х	
254.	(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			х	
255.		Each gate located within 200 ft of any compressor plant building must open outward			х	
256.		When occupied, the door must be opened from the inside without a key			х	
257.	(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			х	
258.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors?			х	

Attachment 1

Distribution Operator Compressor Station Inspection
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N/C - Not Checked

		COMPRESSOR STATIONS INSPECTION (Field)	S	U	N/A	N/C
		(Note: Facilities may be "Grandfathered")			IVA	100
259.	(b)	Do the liquid separators have a manual means of removing liquids?			х	
260.		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?			х	
261.	.167 (a)	ESD system must:				
262.		- Discharge blowdown gas to a safe location			х	
263.	No compressor stations this district.	- Block and blow down the gas in the station			х	
264.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			х	
265.		 Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage 			x	·
266.		ESD system must be operable from at least two locations, each of which is:				
267.	.167	- Outside the gas area of the station			x	
268.		- Not more than 500 feet from the limits of the station			х	
269.		- ESD switches near emergency exits?			х	_
270.	(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?			х	
271.	(c)	Are ESDs on platforms designed to actuate automatically by				
272.		- For unattended compressor stations, when:		HW 1		
273.		The gas pressure equals MAOP plus 15%?			х	
274.		An uncontrolled fire occurs on the platform?			х	
275.		- For compressor station in a building, when			i la	
276.		An uncontrolled fire occurs in the building?	50 S10000 S842 D8018		x	
277.		Gas in air reaches 50% or more of LEL in a building with a source of ignition	1		x	
278.	.171 (a)	(facility conforming to NEC Class 1, Group D is not a source of ignition)? Does the compressor station have adequate fire protection facilities? If fire pumps are used,	 	ļ	ļ	ļ
270.	.171 (a)	they must not be affected by the ESD system.			х	
279.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			х	
280.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			х	
281.	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			х	
282.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			х	
283.	.173	Is each compressor station building adequately ventilated?			х	
284.	.457	Is all buried piping cathodically protected?			х	
285.	.481	Atmospheric corrosion of aboveground facilities			х	
286.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			х	
287.		Are facility maps current/up-to-date?			х	
288.	.615	Emergency Plan for the station on site?			х	
289.	.619	Review pressure recording charts and/or SCADA			х	
290.	.707	Markers			х	
291.	.731	Overpressure protection – relief's or shutdowns			х	

Attachment 1

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

N/C - Not Checked

		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
292.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?	THE REAL PROPERTY.		x	4
293.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			х	
294.	.736	Gas detection – location	†		x	-

Comments: No compressor stations this district.		· · · · · · · · · · · · · · · · · · ·	