

# PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation  
Pipeline and Hazardous Materials Safety Administration

## **PART C – VIOLATION and CIVIL PENALTY INFORMATION**

Note: 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**

**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 (d) External corrosion control: Monitoring

**How did the operator violate the regulation?:**

TransCanada did not take prompt remedial action to correct deficient pipe-to-soil value at the Spokane Gate/Meter Station that was identified during the 2007 inspection.

**Provide additional detail regarding the violation, including the duration and extent of the violation:**

The 6-inch piping has been deficient in cathodic protection for over two years.

**Describe the evidence:**

During the 2007 field inspection at the Spokane Gate/Meter Station, the 6-inch diameter buried looped piping located between the heater unit and the meter building had a pipe-to-soil value of approximately, -443 mv DC, on. The pipes are coated, located near concrete footings, and approximately 60 feet in length. In 2006 the native potential at this location was measured at approximately -229 mv DC.

During the 2009 field inspection, the same 6-inch looped pipe had a pipe-to-soil potential of -210 mv DC, off. The rectifier was off for approximately the past four weeks to measure the District's native potentials.

**How might this violation have impacted public safety? (If an accident or release of product occurred, describe the actual impact on public safety). Was this potential/actual impact in an HCA?**

The Spokane Gate/Meter Station is located within a HCA (Class 3 location).

**How might this violation have impacted the environment? (If an accident or release of product occurred, describe the actual impact on the environment). Was this potential/actual impact in an HCA?**

The release of natural gas would not impact the environment, but would impact gas delivery to the City of Spokane and the county road adjacent to the facility.

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

Mr. Kurt Smith is TransCanada's Pipe Regulatory Specialist. Mr. Smith has completed corrosion courses from the National Association of Corrosion Engineers and understands the importance of cathodic protection for steel pipelines.

**Comments of person(s) interviewed regarding the violation:**

Mr. Smith said a work order was scheduled for this year, 2009, to install anodes in proximity to the looped pipes and no remediation on the piping has been completed since 2007.

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For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the *Enforcement Guidance for Liquid and Gas Transmission IM*)

- Area Finding: [click here to enter](#)
- Risk Category (A-E) [click here to enter](#)

<b>Proposed action:</b> (check one)	<input type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input checked="" type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>	Other: [describe - click here]

## Civil Penalty Assessment Considerations For This Violation:

<Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>

C1 — Degree of the operator's culpability:

C2 — Good faith in attempting to achieve compliance:

C3 — Additional comments applicable to civil penalty:

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Proposed action:	[ ]	NOPV w/ civil penalty	[ ]	NOPV w/ civil penalty & compliance order
(check one)	[ ]	NOPV w/ compliance order	[ ]	Other: [describe - click here]
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## PART D – History of Prior Offenses

Note: Complete Part D only if at least one of the probable violations has a proposed civil penalty

PRIOR OFFENSES				
(for the 5 year period prior to the approx. date of this inspection's NOPV 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 ]	[click ]	[click here to enter]	[click ]	[click here to enter]
[click ]	[click ]	[click here to enter]	[click ]	[click here to enter]
[click ]	[click ]	[click here to enter]	[click ]	[click here to enter]
[click ]	[click ]	[click here to enter]	[click ]	[click here to enter]

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**Inspector's signature & organization**

**Date:**

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_

**PHMSA Region Director's signature**

**Date:**

\_\_\_\_\_

\_\_\_\_\_

(Rev. 1/09)

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## Evidence Exhibit A

Name of Operator: [click here to enter]

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

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## Evidence Exhibit B

Name of Operator: [click here to enter]

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

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## Evidence Exhibit 0

Name of Operator: [click here to enter]

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

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## Evidence Exhibit D

Name of Operator: [click here to enter]

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
[click here]	[click here to enter]	[click here to enter]	[click here to enter]
[click here]	[click here to enter]	[click here to enter]	[click here to enter]

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