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

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

A completed **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	110019			
Inspector Name & Submit Date	Stephanie Zuehlke -1/12/2012			
Chief Eng Name & Review/Date	Joe Subsits – 1/13/2012			
Operator Information				
Name of Operator:	Cascade Natural Gas		OPID#	2128
Name of Unit(s):	Skagit/Island Counties and part of Snohomish			
Records Location:	Mt. Vernon – Skagit County (Kennewick for IM records).			
Date(s) of Last (unit) Inspection:	10.29.07-10.31.07	Formal Exit: 11.07.11	10.17.11-10.20.11 10.24.11-10.27.11 and 11.07.11	

Inspection Summary:

CNG Natural Gas Transmission and Distribution for Skagit, Island, and Snohomish Counties – Std. incl. PA, D/A, IMP, & OQ. P/A Review conducted in 2007.

HQ Address:		**System/Unit Name & Address:**	
8113 W. Grandridge Blvd. Kennewick, WA 99336		1520 S Second St Mt. Vernon WA 98273	
Co. Official:	Eric Martuscelli, VP Operations	**Phone No.:**	360.336.6156
Phone No.:	509.734.4585 Cell 509.572-0294	**Fax No.:**	360.336.3476
Fax No.:	509.377-6097	**Emergency Phone No.:**	888.522.1130
Emergency Phone No.:	888.522.1130		

Persons Interviewed	Title	Phone No.
Patti Chartrey	Pipeline Safety Specialist	206.225.8510
Tina Beach	Mgr stds & compliance`	360.405.4231
Ted McCammant	GM – District Operations Manager	360708.4689
Tiffany Urland	District Manager	360.853.6902
Dustin Knowles	Corrosion Tech	360.941.5986
Chris Grissom	Pipeline Safety Specialist	509.531.6427

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)

☐	Team inspection was performed (Within the past five years.) or,	**Date:**	2012
x	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	**Date:**	01.22.07-01.25.07

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

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 SYSTEM OPERATIONS

Gas Supplier	Williams – Gates at Arlington, WA 0-04 ; Stanwood, WA (PRIMARY) R-63 & O-03 (Williams line odorized from Finn Settlement Rd to Stanwood Gate.) Stanwood, WA (SECONDARY) R-154 and Stanwood (THIRD) R-65 (**Single small commercial customer – Church** - Jordan Rd. E of SR-530, Arlington) O-05 (Wick Odorizer); Mt. Vernon O-02 Beaver Lake R-xx; Sedro-Woolley O-01 R-138)

Services: okay

Skagit County:

City	*Customers Total*	*Residential*	*Commercial*	*Industrial*	*Other*
Anacortes	7,607				
Burlington	4,411				
La Conner	622				
Mt Vernon	10,170				
Sedro Woolley	3,783				

Island County:

City	*Customers Total*	*Residential*	*Commercial*	*Industrial*	*Other*
Camano Island	655				
Oak Harbor	6,062				

Snohomish County:

City	*Customers Total*	*Residential*	*Commercial*	*Industrial*	*Other*
Arlington	4,454				
Marysville	521				
Stanwood	1,669				

Residential 38,857 ***Commercial*** 4532 ***Industrial 119*** ***Other 0***

Number of reportable safety related conditions last year 0	Number of deferred leaks in system 2008 – 6; 2009-2; 2010-0; 2011-0
Number of <u>non-reportable</u> safety related conditions last year 0	Number of third party hits last year 2011 - 13
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) Total 43.8miles and 14.43 in Class 3&4	Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) Total 776.62 miles and 776.62 in Class 4

Operating Pressure(s): Asked to review R-19 and R-75 charts in addition to the Reg Sta MAOP List. There was a problem that occurred and was cleared up with engineering too.		**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:	2007: 16" Fredonia Lateral 2011: Reviewed and in file.	500 highest MAOP in Distr.	Inlet 477 Outlet 290 psig
Town:	2007: Mt. Vernon 2011:Reviewed and in file.	250 MAOP at R73	Inlet 240 Outlet 45 psig
Other:	2007: Lowest pressure 2011: Reviewed and in file.	45 MAOP off R34 in Anacortes	Inlet 41 Outlet 6 psig

Does the operator have any transmission pipelines?	2007: Yes, 2 transmission lines broken into 4 sections. 2011: Yes, 4.
Compressor stations? Use Attachment 1.	2007: Yes, One 2011: Yes, One.

Pipe Specifications:

Year Installed (Range)	1956 to present	Pipe Diameters (Range)	1/2 to 16"
Material Type	3408 PE and steel API 5L	Line Pipe Specification Used	X-42, x-42/X-52
Mileage	2007: Total main is 700 miles and Fredonia line is 20.58 miles 2011: See above and under operating pressures and MAOP List.	SMYS %	2007: 27.37% SMYS is the Fredonia 2011: Fredonia Line 14: 27.38% Anacortes Line 1: 21.85% 8" March Pt. Line 2 Skagit Co.: 21.85%

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

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.

			16" March Pt. Line 16 Skagit Co: 27.38% All other lines Transmission & Distribution are 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** 10.25.11

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:** 11.07.11

PART 199 Drug and Alcohol Testing Regulations and Procedures		S	U	NA	NC
Subparts A - C	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 D/A Form#13 for details re: unsatifactory		x		

	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? 2011 was submitted.	x			
3.	191.5	Immediate Notice of certain incidents to **NRC (800) 424-8802,** or electronically at http://www.nrc.uscg.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 in this area.	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. None	x			
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	x			
6.	191.15(c)	Supplemental report (to 30-day follow-up) Yes.	x			
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).*	x			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov	x			
9.	191.23	Filing the **Safety Related Condition Report** (SRCR) None	x			
10.	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery None	x			
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential **Safety Related Conditions None**	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 N/A	x			

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

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.

	REPORTING RECORDS		S	U	N/A	N/C
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	x			
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; None	x			
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; 2010-1 June 10, 2010 @ 4309 Bryce in Anacortes.	x			
18.	480-93-200(1)(d)	The unintentional ignition of gas; None	x			
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; 2010 - 0	x			
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; 2010 - 0	x			
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;	x			
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; None 2010 - 0	x			
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; None - 2010	x			
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	x			
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP 2007 – 2011 excluding Sedro Woolley – 2008=1 at R-151 in Anacortes at 2702 W. 3rd St. exceeded MAOP by 1psig.	x			
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;	x			
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;	x			
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;	x			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
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;	x			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			
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)(l)	Any other information deemed necessary by the commission.	x			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	x			
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**	x			
42.	480-93-200(7)	**Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year				
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 Rec'd late but okay because Federal site locked and outside control of CNG	x			
44.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
45.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; 2010 - 4,685	x			

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

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.

	REPORTING RECORDS		S	U	N/A	N/C
46.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and 2010 - 13	x			
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; (C) Excavated prior to a locate being conducted; or (D) Other.	x			
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.	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	x			
50.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
51.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	x			

Comments:

	CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION		S	U	N/A	N/C
52.	192.16 AOC Complaint #6	**Customer notification** - Customers notified, within **90 days**, of their responsibility for those service lines not maintained by the operator Customer notification with bill stuffer twice in 2011 and online for customer responsibility under paysite and additional future plans. CP 780.061(c) states that this information will be retained or is available in Premise Customer Information database system dated July 6, 2010.		x		
53.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	x			
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? Yes.	x			

Comments:

CONSTRUCTION RECORDS	S	U	N/A	N/C

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

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.

CONSTRUCTION RECORDS			S	U	N/A	N/C
55.	480-93-013 ~~AOC~~ changed to PV Under 192.809	OQ records for personnel performing New Construction covered tasks Compressor Sta: Roy Deleon Meter Inspector; Terry Hauck – Meter Inspector, Levi Davies – Comb. Welder; Scott Corcoran – Svc Mech A. Reg. STa. Maintenance – All Svc. Mech. Capabilities. Comb. Welders – Levi Davies, Chris Greenoah CNG's sole method of operator qualification evaluation for compressor stations is observation of on-the-job performance per 1700DOT731, 1720DOT731, 1740DOT731. OQ training is not complete enough – procedures for operation need to be written with more detail to match the actual work performed. – This is addressed under OQ under compressor station section.		x		
56.	192.225	Test Results to Qualify Welding Procedures Coupon OQing	x			
57.	192.227	Welder Qualification Visual Inspection CP changes forthcoming, Forthcoming Coupon OQing.	x			
58.	480-93-080(1)(b)	Appendix C Welders re-qualified **2/Yr (7.5Months) N/A**	x			
59.	480-93-080(2)	Plastic pipe joiners re-qualified **1/Yr (15 Months)**	x			
60.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period **N/A**	x			
61.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners **1/Yr (12Months)**	x			
62.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992	x			
63.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains None on transmission lines. Mains – None on WSC.	x			
64.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	x			
65.	192.241(a)	Visual Weld Inspector Training/Experience Revising this procedure but it is tracked – complaint	x			
66.	192.243(b)(2)	Nondestructive Technician Qualification None internally – hired out	x			
67.	192.243(c)	NDT procedures Yes, CP – 760.10	x			
68.	192.243(f)	Total Number of Girth Welds Requested info on installed NDT'd pipe for 2010 & 2011. Project 178132 Sedro Woolley 6 Total and 4 Girth, Project 174254 Anacortes 2 Girth.	x			
69.	192.243(f)	Number of Welds Inspected by NDT All above girth welds and additional fittings = 24 shots.	x			
70.	192.243(f)	Number of Welds Rejected None	x			
71.	192.243(f)	Disposition of each Weld Rejected N/A	x			
72.	.273/.283	Qualified Joining Procedures Including Test Results	x			
73.	192.303	Construction Specifications	x			
74.	192.325 WAC 480-93-178(4)(5)	Underground Clearances Procedure 605.022 okay.	x			
75.	192.327	Amount, location, cover of each size of pipe installed	x			
76.	480-93-160(1) PV	Report filed **45 days** prior to construction or replacement of transmission pipelines **≥ 100** feet in length What is date submitted and what date approved? Yes, Sent 06.10.11 Approval 07.29.11. Not started yet – replacement 2010 Line 1 Anacortes (Golf Course & Hwy 9) directional bore due to exposure at Brickyard creek was not submitted. Approx. 363ft. (CNG identified to staff that Line 1 Anacortes operates at 21.85% . Distance exceeds 100') 2011 Line 1 Anacortes Similk Bay Golf Course Hwy 20 – not submitted. Approx. 117ft. installed. (CNG identified to staff that Anacortes Line 1 operates at 21.85% and obviously exceeds 100'.)		x		
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: Staff recalls noting project route but would like CNG to verify that route was provided with filing. See above.	x			

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

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.

CONSTRUCTION RECORDS			S	U	N/A	N/C
78.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; Ted id'd that CNG sends all paperwork back to engineering – I requested info on whether their procedures require them to keep a copy in the district. CP 870 – Copies of as-builts will be retained in District.	x			
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.	x			
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	x			
81.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed;	x			
82.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route.	x			
83.	480-93-160(2) PV No information on jeeping equipment provided. No # for equipment and no calibration frequency. Procedures do not say recal for each job Procedures have not been updated with detail necessary to perform task See Dustin Knowles Coating survey for Similk Bay re-route project dated 11.01.11 & 11.02.11	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; Similk Bay, Anacortes 8" new main install. Jeeping Procedures- 605.049. Calibration doc for equipment. Pryteck, did visual inspection per Bill Danko. §192.461 (c) External corrosion control: Protective coating. §192.461(c), Compliance. Each external protective coating must be inspected just prior to lowering the pipe into the ditch and backfilling, and any damage detrimental to effective corrosion control must be repaired. Requested: if not necessary what is design per SF what was specific procedure, what doing after install and develop procedure to address. Provide mfg. installation details regarding jeeping prior to install in ditch. Requested: if not necessary what is design per SF what was specific procedure, what doing after install and develop procedure to address. Provide mfg. installation details regarding jeeping prior to install in ditch. May 5, 2010 Stephanie Zuehlke Pipeline Safety Engineer Washington Utilities and Transportation 1300 S. Evergreen Park Dr. SW PO Box 47250 Olympia,WA 98504-7250 RE: PG-082195 Cascade Natural Gas Procedures Related to Jeeping Dear Stephanie, Per our telephone conversation today, this letter is intended to clarify Cascade's procedures related to jeeping of coated, steel pipelines. Cascade CP 605 (Steel Gas Main and Lateral Construction) section .0491 states that all pipe 4" and larger will be jeeped, and pipe less than 4" will be visually inspected. The procedure implies, but doesn't specifically state, the jeeping will be accomplished with electronic jeeping equipment. Generally our past practice has been to use a jeeping machine for 4" and larger main extensions, but we have occasionally "hand jeeped" (using no machine) short lengths of pipe. Going forward we will jeep, with a jeeping machine, all new coated steel pipe 4" and larger. Additionally, as a part of our integration process, we will likely be changing from our current coating (extruded polyethylene) to fusion bonded epoxy. If and when this occurs, our jeeping procedure will also likely change. The final procedure is dependent on acceptance and approval by all MDU utilities, but it will likely include using a jeeping machine for all coated, steel pipe, regardless of diameter. If anything further is required to close this issue, please let me know. Thank you. Sincerely, Chanda Marek, PE		x		
84.	480-93-160(2)(g) PV for attachment of test lead coupons Reviewed in Kennewick 11.07.11	Welding specifications; and Procedure for X-60 filet of test lead coupon states X42 or less pipe should be used. Also provide test documentation. In Kennewick CNG staff identified that their above process is the best process for attachment. I again informed them that this method (according to PHMSA email response to staff questions) is not acceptable and they need to cease using this method of test lead installation. They still believe that their method is best so I mentioned to them that they could submit their data to PHMSA in a letter asking for a formal interpretation.		x		
85.	480-93-160(2)(h)	Bending procedures to be followed if needed. None	x			
86.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ **20% SMYS**? Anacortes Line #1 Brick Yard Creek Project E of Sedro Woolley 8". Review paperwork for SMYS, etc. Tested at 13%.	x			

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

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.

	CONSTRUCTION RECORDS		S	U	N/A	N/C
87.	480-93-170(7) AOC	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) (a) Gas pipeline company's name; (b) Employee's name; (c) Test medium used; (d) Test pressure; (e) Test duration; (f) Line pipe size and length; (g) Dates and times; and (h) Test results. 106 Talcott St. Employee neglected to include his name on one of the forms that showed the pressure test – just wrote CNG		x		
88.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? None	x			
89.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Requested 2010 records. LaConner-Whitney Rd., La Conner is only contractor project worked in 2010 in this district. –p Dial Gauge recal/cal requested. CNG identified they will monitor contractor equipment calibration in District and new equipment will be identified as such and old will be marked/tracked as retired.	x			
90.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines **> 60 psig** None	x			
91.	480-93-175(4)	Leak survey within **30 days** of moving or lowering pipelines **≤ 60 psig** Yes. Moore St & Reed Ave S. Sedro Woolley, 1st Survey 08.16.11 w/follow-up on 08.22.11	x			

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**	x			
93.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – **5 years**	x			
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 This process is changing and is to be included and addressed in the Complaint under Item #1 and #3 and #6. No records showing completed within NTE 15 months		x		
95.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel CNG personnel do not carry paper maps unless on specific tasks. At this time CNG is shifting to total GIS and is concerned with having incorrect data in the field. Remaining field personnel are anticipating receiving computers before the end of the year but not carved in stone. This issue will be part of Settlement agreement Item #5.	x			
96.	480-93-018(3)	Records, including maps and drawings updated within **6 months** of completion of construction activity?	x			
97.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures	x			
98.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures Review transmission leak survey docs etc before okaying.	x			

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

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.

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
99.	192.609 PV	Class Location Study (**If applicable**) 2012 next due – reviewed 2009 There is no documentation associated with this study identifying location, etc. This study is unacceptable for this use in its present form. Compliance provided staff with a "transmission Mains – by class location" document that identifies the # of miles as their class location study. The words "class location study" were penciled in by compliance who crossed out "2010" from the form. THIS DOES NOT MEET THE STUDY REQUIREMENTS. CNG compliance staff are passing off documents used for a very different purpose for something they have engineered for compliance - this way of doing things needs to be brought to CNG upper mgmt. attention.		x		
100.	192.611	Confirmation or revision of MAOP None.	x			
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? CP 835 , district monitoring, one-call, surveillance. 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) Action taken in one instance where employee needed reprimand and retraining with more one on one.	x			
103.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? N/A	x			
104.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	x			
105.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? Yes, but reviewed procedures to determine whether detailed changes need to be made – none noted	x			
106.	192.614	Review operator locating and excavation procedures for compliance with state law and regulations.	x			
107.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Reviewed several tickets via computer dB for August 2011.	x			
108.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? Reviewed 2 employees qualifications. Justin Moe 1440DOT Locating and marking lines – Operator 3140CNG – 1460DOT Inspection of Excav. Near lines. 1100DOT Pipe support in Excav. Levi Davies 1440DOT Locating and marking lines – Operator 3140CNG 01460DOT Inspection of Excav. Near lines. 1100DOT Pipe support in Excav.	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? In addition to one call, etc. they do line watches 2011 is approximately 142. 2. In the case of blasting, does the inspection include leakage surveys? Completed pre & post surveys on 06.02.11	x			
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 https://identity.damagereporting.org/cgareg/control/login.do **Y** **N** x	x			

Comments:

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

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.

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 Reviewed several leak response records which Tiffany reviews daily for appropriate response.	x			
113.	192.615(b)(1)	Location Specific Emergency Plan	x			
114.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training (2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective. Reviewed management emergency review Form 234 (Rev 2/11)	x			
115.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	x			
116.	192.615(c) AOC	Liaison Program with Public Officials Staff has documentation of liaison contacts and a new LEPC (Local emergency planning group) with county wide emergency planning discussion startup. Saw Skagit, Island and Sno Counties. Requested information on frequency of contact information to maintain liaison relationship with public officials per 192.615(c) 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. Ted has documented the location of valves/mains, etc. for public building such as schools for distribution pipelines incl. offset distances, etc. Wrote this up on a previous inspection for Kitsap in 2009. Requested that CNG take public officials list from their emergency contact information exchange and the dates they made contact for 2009, 2010, & 2011 for (1) and (4) above. Checked Anacortes and Burlington. No contact for all listings for 2009, 2010, 2011. CNG Compliance in 2010 did draft a new Emergency contact checklist. List appears to be fairly comprehensive but no consistant frequency in contact for 2009, 2010, & 2011.		x		
117.	192.616	**Public Awareness Program**				
118.	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:	x			
119.		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.				
120.		**API RP 1162 Baseline* Recommended Message Deliveries**				

121.

Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)
Residence Along Local Distribution System	Annual okay
LDC Customers	Twice annually okay
One-Call Centers	As required of One-Call Center okay
Emergency Officials Tina identified this will be part of Q/A & Q/C Complaint item #3 and #6. **AOC**	Annual CNG has agreed to better coordinate their Emergency responder contact checklist items to their CP so it is readily apparent the checklist matches the requirements of their CP's.
Public Officials Tina identified this will be part of Q/A & Q/C Complaint item #3 and #6. **AOC**	3 years Oak Harbor Chad Michael, Training and Operations Chief – Whidby FD. CNG has identified to better followup with providing PL Emergency Response info to those Official contacted annually (per CP's) that do not recall and/or did not receive their materials.
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 Paradigm and Solaritus Requested info for their mailing in 2011
One-Call Centers	As required of One-Call Center
Emergency Officials	Annual okay
Public Officials	3 years okay
Excavator and Contractors	Annual Updated annually through USA Info- Requested update info for 2010&2011 Response Technologies – mailing outfit 5143 41st Ave. Denver Run by Jeff Farrells @ PAPA on 04.14.10/

122.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.				
123.	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			
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, 2010**. .616(h) Written program completed and contains a summary but no documentation showing the third party summary was evaluated through any means other than through PAPA.	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. Requested info on 491 NE Midway Blvd, Oak Harbor and whether a MM- provide to Patti Johnson	x			

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

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.

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) CNG id'd a pin-hole leak in the casting for a valve but this was not sent for testing and no recurring issues similar. Asked whether CNG knows how many are in the field that passed the test that may need replacement at some point since unknown what Mueller's corrective action is.	x			

Comments:

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)	x			
128.	480-93-015(1)	Odorization of Gas – Concentrations adequate? Reviewed 2010 records.	x			
129.	480-93-015(2)	Monthly Odorant Sniff Testing Discussed necessity of sniff test at extremities.	x			
130.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements	x			
131.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Calibration record CNG 296 for equipment 511-002 dated 07.07.11 is incomplete. Monthly sniff tests have been done but recal report is incomplete – reviewed – okay.	x			
132.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months)**	x			
133.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days?**	x			
134.	480-93-140(2) AOC Complaint QA/QC Item #6	Service regulators and associated safety devices tested during initial turn-on Requested June 2010 and June 2011 sets. Copy of CNG Form 305 dated 06.07.10 WAC 480-93-018 Records. CNG identified that odorant check/test did not apply and they did not complete Service Request Form 305 stating that odorant was detectable during regulator set/lock-up. Forms were reviewed for September 2010. The GM identified there is no reason that in testing for lock-up that the servicemen should not smell gas.		x		
135.	480-93-155(1)	Up-rating of system MAOP to **>60 psig**? Procedures and specifications submitted **45 days** prior?	x			
136.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? Requested April 2010 and April 2011 for Oak Harbor and Burlington	x			
137.	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; None since June 2008	x			
138.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? None noted so no retention review.	x			
139.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within **30 days** of a leak repair?	x			
140.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? None noted	x			
141.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	x			
142.	480-93-188(1) PV.	Gas leak surveys Check for FI calibration – id'd as being part of the leak survey records. Section 1 dated 05.17.10 – Multiple services not recorded as leak surveyed on leak survey maps. Gilkey Rd. 100, 102, 107, 108, 112, 202, 304, 306, 310. Spruce St., 1010, 1020, 1026, 1170, 1180, 1192. Instersection of Gilkey Rd. BNSF RR there is a N/S section of main not survey. These locations were identified as leak surveyed in 2011, 2009, and 2008.		x		

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

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.

143.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) Reviewed 2010 CGI required to be completed monthly NTE 45 days. FI completed prior to use. Reviewed calibration docs for Chart Boxes – okay Reviewed docs that id'd calibration Division Chart Box Reynolds #9181PR used on 8" golf course line in Anacortes in October 2010. Tina identified that form CNG 296 will be kept for QA/QC purposes and the form may be redesigned in the future pending determination of effectiveness – CP and form will need adjustment if any changes. Checked 2 pyrometer recal – okay for 2009 and 2010 on quarterly basis. Reviewed recal for dial gauges – annual okay	x			
144.	480-93-188(3)	Leak survey frequency **(Refer to Table Below)**	x			

Business Districts **(implement by 6/02/07)**	**1/yr (15 months) Burlington**
High Occupancy Structures Tiffany designed a PBI tracker for her district – she pulled a list of all PBI's and checked the list against the monthly PBI's generated by CC&B – All have appeared on the list. Excellent check! PV	**1/yr (15 months)**CNG completes HO structures within the Section 1 (annual surveys) Outside these areas a list is generated annually. **Requested list of HO's outside the annual areas.** In 2009 CNG failed to check all HO service lines for locations that did not have a meter. After learning that all HO leak surveys require survey annually, the surveys have been completed since for 2010 & 2011.
Pipelines Operating ≥ 250 psig Reviewed Line 1 2008, 2009, 2010 & 1st half of 2011 Reviewed Line 2 2010 & 2011	**1/yr (15 months)** Fredonia Line 14: 27.38% Anacortes Line 1: 21.85% 8" March Pt. Line 2 Skagit Co.: 21.85% 16" March Pt. Line 16 Skagit Co: 27.38% **And others on list Mt. Vernon MAOP HP Lines**
Other Mains: CI, WI, copper, unprotected steel	**2/yr (7.5 months)** None

145.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs Oak Harbor 2010- completed following alterations. Reivewed - okay	x			
146.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred None for 2011 in entire territory. 300 block of Moore St., Sedro-Woolley dated 08.30.11 and 582 Moore St, Sedro Woolley 08.16.11.	x			
147.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected None	x			
148.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions – Blasting area in 2010 in Anacortes	x			
149.	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 – Requested 224 heather Dr., Camano dated 04.10.11, 3311 182nd St. NE, Arlington dated 09.19.11; and 123 Stillaguamish, Arlington dated 08.02.11	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) Section 6 Burlington 2011 & 2006.	x			
151.	480-93-188(6) AOC	Leak program - Self Audits CNG identified they are now reviewing damage Last Leak program seof audit occurred in 2008. 2011 report is not yet completed. Tied to Complaint item #1 and #3		x		
152.	192.709	Patrolling (Transmission Lines) **(Refer to Table Below)** .705	x			

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)**

153.	192.709	Leak Surveys (Transmission Lines) **(Refer to Table Below)** .706	x			

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

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.

Class Location	Required	Not Exceed
1 and 2	1/yr	15 months
3	2/yr	7½ months
4	4/yr	4½ months

154.	192.603(b)	Patrolling Business District (**4 per yr/4½ months**) .721(b)(1)	x			
155.	192.603(b)	Patrolling Outside Business District (**2 per yr/7½ months**) 192.721(b)(2)	x			
156.	192.603(b)	Leakage Survey - Outside Business District (**5 years**) 192 .723(b)(1)	x			
157.	192.603(b)	Leakage Survey 192.723(b)(2) • Outside Business District (**5 years**) • Cathodically unprotected distribution lines (**3 years**)	x			
158.	192.603(b)	Tests for Reinstating Service Lines 192.725	x			
159.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727None	x			
160.	192.709 JOE: AOC or PV Written as PV right now. for Plans and procedures for horiz. Vents.	Pressure Limiting and Regulating Stations (**1 per yr/15 months**) .739 R-18, 248 and 243psig - okay R-116 - - noted last 2 annual id'd rainwater in relief – identified they may need to address more frequently. R-19 - okay R-89, 90, 91, 134 – **horizontal vents – 5 – bid letting occurred & approved – Oqing at present. Eng. Reviewed. R-91 is set at MAOP and Relief is set at 110%.** R-41 220 and 149 – **horizontal vents - 2** R-74 – 399 and 389psig R435psig - okay R-119 – 58 and 54psig R-63psig – cautioned CNG regarding relief setpt at 63psig with MAOp AT 60PSIG – RELIEF HAS ONLY 3PSIG TO FULLY OPEN. R-83 – **2 horiz vents** one without screen and plugged with dirt.		x		
161.	192.709	Pressure Limiting and Regulator Stations – Capacity (**1 per yr/15 months**) .743 1. R-18: Records show low end of spring range fluctuates btwn 35-300 and 75-300. Asked CNG to review records documentation issue. This does not affect the operation of the regulator set points. – review at site visit. Patti will respond with information on lower spring range designation changes and how occurred. 2. R-19: Appear okay – review at site visit	x			
162.	192.709	Valve Maintenance – Transmission (**1 per yr/15 months**) .745 V-110 - okay; V-91 - okay, V-26 - okay, V-21 - okay	x			
163.	192.709	Valve Maintenance – Distribution (**1 per yr/15 months**) .747 V-71-never installed, V-113 - okay, V-201- newly installed 09.28.11	x			
164.	480-93-100(3)	Service valve maintenance (**1 per yr/15 months**) SV-01- SV-18 Procedure appears okay	x			
165.	192.709	Vault maintenance (**≥200 cubic feet**)(**1 per yr/15 months**) .749 None	x			
166.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751 do not issue but aware of accidental ignition precautionary measures. Obtained a hot work permit at Shell Refinery on 07.21.11.	x			
167.	192. 603(b) PV complaint Issue #1, #4, and #5. Per PHMSA email this procedure no longer viable/acceptable procedure for attachment of test lead wires.	Welding – Procedure 192.225(b) Bill Danko provided copies of their new standard welding procedure for Locate Coupons. LC-AF-42Y-SD-TW-G3 for API 5L-X-42 and lower & LC-AF-60Y-SD-TW-G3 also states API 5LX-42 or lessor grade – THIS SHOULD BE FOR X-46 THROUGH X-60. – Needs to be corrected. Procedure 760 has not been updated yet. Although this procedure was written incorrectly staff not responding w/PV due to PV for 192.471 written for CNG to immediately cease attachment of test lead wires using coupon and fillet weld		x		
168.	192. 603(b)	Welding – Welder Qualification 192.227/.229	x			
169.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2)	x			

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

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.

170.	192.709	NDT Records (**pipeline life**) .243(f) R-89, R-90, & R-91 (V-110)Shell Oil Refinery – looks okay, contains documents of OQ & vision for contractor Northwest Inspection. CNG is sandblasting & painting. In process of new OQ for new painting process. R-134 identified as needs paint in 07.29.11 Reviewed NDT records for several job numbers: 05.06.10, 05.13.10, 05.18.10, 10.25.10	x			
171.	192.709	Repair: pipe (**pipeline life**); Other than pipe (**5 years**) None other than one project at Similk Bay Golf course and HWY 20 in Anacortes which is in progress at the time of this inspection.	x			
172.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) during patrols and linewalks. See copy of notification new for 2011 sent to districts.		x		

Comments:

WAC 480-93-180(1): CNG does not appear to have detailed knowledge for gaining timely acces to their transmission pipeline within the Shell & Tesoro Refineries. Staff notes that CNG presently has 2 employees that complete leak survey on these lines that have completed the Refinery's safety orientation. Mike Pearcy, Svc Mech A, & Jim Morse Svc Mech A, Roy DeLeon, Meter Inspection A, Levi Davies, Comb. Welder., and Scott Corcoran, Svc. Mech A. – all have TWIC access. Updating list of Refinery contacts to be provided prior to leaving Gas Control has this info and it is available. Okay.

CORROSION CONTROL RECORDS			**S**	**U**	**N/A**	**N/C**
173.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	x			
174.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)*	x			
175.	192.465(a)	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**)	x			
176.	192.491	Test Lead Maintenance .471	x			
177.	192.491	Maps or Records .491(a)	x			
178.	192.491	Examination of Buried Pipe when exposed .459	x			
179.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	x			
180.	192.491	Annual Pipe-to-soil monitoring (**1 per yr/15 months**) .465(a) reviewed 2010 & 2011	x			
181.	192.491	Rectifier Monitoring (**6 per yr/2½ months**) .465(b) Reviewed 2010 & 2011 and noted short form# 12-003 date 08.15.11 low read 06.13.11 okay within timeframe of remediation of 2 wks.	x			
182.	192.491	Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c) None	x			
183.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c) Just started added and including in annual surveys – CNG now has 3 as follows for this district: R-75 Avon Allen Rd at Lateral, Burlington, R-156 Township St. S of Lucas Dr, Sedro Woolley, and new site at Similk Bay Golf Course. For 2011 Bond not id'd as bond but 2012 forms reflect new bond id info. Because breaking system down to smaller locations to better trouble shoot and balance system.	x			
184.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) Total CP shorts 2011 7 with resolution within timeframe.	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. Reviewed 2009, 2010, 2011.	x			
186.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/39 months**) .465(e) None.	x			

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

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
187.	192.491	Electrical Isolation (**Including Casings**) .467 In process of placing on maps in GIS and reviewed map of Mt Vernon wet well in ground beds folder on CNG U:\\drive. Newest installed impressed current surface bed on McLaughlin #17, Mt Vernon. Installed 06.22.11 to be activated in conjunction with upcoming new annual survey. Installed due to old rectifier 1972 vintage that will be burning out.	x			
188.	480-93-110(5)	Casings inspected/tested annually not to exceed **fifteen months** Check with Dustin on casing monitoring of Channel related to Gear Rd. E. of Old 99 – Copy in folder of 11.15.10 w/casing emails.	x			
189.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	x			
190.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within **90 days** Follow-up takes place at the same time of discovery	x			
191.	480-93-110(5)(c)	Casing shorts cleared when practical	x			
192.	480-93-110(5)(d) PV And of WAC 180 & 188	Shorted conditions leak surveyed within 90 days of discovery. **Twice annually/7.5 months** Leak Surveys for shorted casings do not have leak survey documentation associated with shorted reads for Blackburn casing. No documentation of CGI equipment used, maps of leak survey, identificationof permimeter, etc. Copies of 2010 and 2011 in folder		x		
193.	192.491	Interference Currents .473 None aware of in this district and just started testing xings in 2011	x			
194.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) None but in CP's	x			
195.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	x			
196.	192.491	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) .477	x			
197.	192.491	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481 Reviewed Mt. Vernon Emergency Shut down areas with regard to A/C completion – reviewed 2009 & 2010 and two shut areas A/C completed in 03.11 1. Shell Refinery has A/C, - requested monitoring records 2. Sedro Woolley Gate #74 has A/C – requested monitoring records 3. Fredonia Reg Sta #83 has A/C – requested monitoring records	x			
198.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	x			

Comments:
Dustin Knowles added test sites (CP 755) at interference xings as additional annual CP check sites – instituted in 2011 for the first time. 13 on 8" transmission line and 21 on 16" transmission line new in 2011. Patti id'd that she will send to Smart Team for review to potentially add to CP's as requirement.

PV – R/W clearing issues .

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
199.	192.161 AOC	Supports and anchors Combustible supports noted during inspection at R-47 under meter on April 2. 2010 as a temporary support.		x		
200.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	x			
201.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	x			
202.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	x			
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 followed.	x			
204.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified? Reviewed Compressor OQ for shut down & start up for Scott Corcoran , Levi Davies, Terry Hauck (Bellingham), Roy DeLeon (on FMLA at time of inspection)	x			
205.	480-93-015(1)	Odorization	x			

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

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.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
206.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	x			
207.	192.179	Valve Protection from Tampering or Damage	x			
208.	192.455	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	x			
209.	192.463	Levels of cathodic protection	x			
210.	192.465	Rectifiers	x			
211.	192.467	CP - Electrical Isolation	x			
212.	192.476	Systems designed to reduce internal corrosion	x			
213.	192.479	Pipeline Components exposed to the atmosphere	x			
214.	192.481	Atmospheric Corrosion: monitoring 1. Shell Refinery has A/C, - requested monitoring records 2. Sedro Woolley Gate #74 has A/C – requested monitoring records 3. Fredonia Reg Sta #83 has A/C – requested monitoring records	x			
215.	192.491	Test Stations – Sufficient Number .469	x			
216.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
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 casing ends nearest to building walls sealed?	x			
219.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted		x		
220.	192.605	Knowledge of Operating Personnel	x			
221.	480-93-124	Pipeline markers	x			
222.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days?**	x			
223.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**)	x			
224.	192.195	Overpressure protection designed and installed where required?	x			
225.	192.739/743	Pressure Limiting and Regulating Devices (**Mechanical/Capacities**)	x			
226.	192.741	Telemetering, Recording Gauges	x			
227.	192.751	Warning Signs	x			
228.	192.355	Customer meters and regulators. Protection from damage	x			
229.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	x			
230.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	x			
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? None noted see above #234			x	
236.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? None noted – see above #235			x	
237.	192.745	Valve Maintenance (Transmission)	x			
238.	192.747	Valve Maintenance (Distribution)	x			

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

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.

PIPELINE INSPECTION (Field)	S	U	N/A	N/C

Facility Sites Visited:

Facility Type	Facility ID Number	Location

Comments:

110019 SKAGIT, ISLAND, AND SNO COUNTY – PRE-FIELD/FIELD INSPECITON

10.12.11
Burlington
Overcast/Cloudy 55F

1. Sports Ket S. Burlington Blvd.
   a. Meter 687852
   b. Bent 3-meter manifold
   c. 1P
2. Skagit Cycle S. Burlington Rd.
   a. Bent manifold
   b. No P
   c. Next meter S of 687652
3. Payless Shoes S. Burlington Blvd
   a. 5-meter manifold
   b. 248759
   c. CP-0.75
4. Payless Shoes
   a. 8-meter manifold
   b. 675206
   c. CP-0.745
5. Behind Kmart
   a. 273872
   b. Horizontal orientation on regulator – AOC (CNG correcting all horiz. during A/C surveys.
   c. Primer on riser
   d. Meter loop impacted? (CNG correcting procedure at time of inspection)
   e. 2P
   f. CP-0.597
6. Behind Kmart
   a. 285429 Turbine
   b. CP-0.566
   c. Riser wrap damaged
   d. Customer piping holding up entire loop – no supporting own equipment
7. 380 Pease Rd
   a. 291269
   b. CP-0 693
   c. No interface
   d. 1P
8. Esary Roofing Pease Rd.
   a. 232509
   b. CP-0.697 through -0.787
   c. Partially buried meter
   d Bent Riser?
   e. 2P
   f Customer excavation over/near service & riser
9. **Contacted CNG to report major CP issues above – Dustin Knowles (CP mgr) had notified Patti Chartrey this a.m. to let her know that they had just found their rectifier was down. He met me at 380 Pease Rd for discussion/review. CNG was already working the problem when I found it. CP levels returned to normal in the PM same day noted low by UTC staff.**
10. 1376 S Burlington Rd
    a. 616719
    b. 1P
    c. Meter manifold/riser bent

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

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.

Comments:

11. 160 Cascade Pl
    a. 2P Locked gate – meter manifold
    b. CNG gas lock removed & laying on ground near riser
    c. Reported gas lock removal to CNG
12. Cascade Pl
    a. 680071 – 1000 meter
    b. No interface procetion
    c. 12-meter manifold
    d. Nice support
    e. Welds – some of the welds appear undercut
    f. CNG id'd manifold as factory made

10.12.11
Oak Harbor
Overcast/Cloudy 55F

13. Meter 291495
    a. CP-1.437
    b. Bent riser
    c. 2P
14. Meter 602051
    a. CP-0.855
15. Meter 288251
    a. Cracking interface coating
16. 499 NE Midway Blvd
    a. 2P
    b. Meter manifold/reg under steel grate stairs
17. 491 NE Midway Blvd.
    a. Master Meter Possible
    b. Individual service/piping running to each room/underground piping
18. 573606
    a. CP-1.439
    b. 2P
    c. Bent riser – stress/support issue potential
19. 183297
    a. CP-1.377
20. 890 SE Bayshore Dr
    a. 236718
    b. 3-meter manifold
    c. CP-1.390
    d. Overgrown – this years growth only
    e. Newly/recently painted – no visible A/C
21. SE Bayshore Dr
    a. 685156
    b. 2P
    c. Uncoated w/surface A/C
22. SE Baysore Dr
    a. 561617
    b. 2-meter manifold
    c. 1P
    d. Epoxy mill coat on riser
23. 705 SE Pioneer Way
    a. 1P
    b. Reg vent at taped open electrical conduit
    c. 9-meter maniforld
24. 220544
    a. 4P
    b. 5-meter manifold supported on open/unplugged threaded carrier pipe at farthest right (end) meter manifold (¼ turn valve shut position) but piping supported on concrete block.
    c. severely bent riser
25. Memories Antiques across from 1175 Ireland St Credit Bureau of Island County
    a. Highly damage/erosion area/extremely steep slope of unstable mtl.
    b. Meter set partially buried
    c. Unable to access meter safety due to location so is valve accessible?
    d. Construction/sanitary construction area
    e. 3P

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

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.

Comments:
10.12.11
La Conner
Overcast/Cloudy 55F

26. The Station House Bar & Grill
    a. 627717
    b. Appears okay except for it's the smoking location
27. La Conner Marina
    a. 202005
    b. CP-1.204

FIELD INSPECTION
10.24.11

1. R-18
    a. 264 Lockup Relief
    b. 248 primary
    c. 243 secondary???
    d. R/W is uncleared
        i. IP
        ii. BB – unable to leak survey through BB
        iii. Review leak survey for Line 5
    e. Markers buried
    f. Casing in ditch xing w/casing vents
2. R-116
    a. Vent sign does not have gas company name
    b. IP
    c. A/C at interface of primary
    d. Valve appears okay
3. R-1
    a. Sign – missing danger/caution/warning language and statement re: natural gas pipeline
    b. R/W issues due to BB growth
    c. IP
    d. Interface has surface A/C
4. R-89, 90, 91, 134, V-110
    a. 5 horizontal vents - AOC
5. R-47 and meter w/225psig operating pressure
    a. Supported on temporary wood supports on April 2, 2010, and supposed to complete work/repair October 2010/one month ago
6. R-41
    a. 149 Lockup
    b. 220 on Secondary
    c. V-38
    d. Station has 2 horizontal vents
    e. Pitting on pipe noted
7. Similk Golf Course
    a. 8" transmission relocation
    b. Requested jeeping records – no jeeping done
        i. CNG identified that they installed thicker coating (usually used for boring) so they wouldn't have to/and didn't intend to jeep
        ii. Later identified that they didn't have enough jeeping equipment to provide equipment for this installation
        iii. Staff provided CNG with documentation that they had informed the UTC that they would always jeep pipe >4" and in future would probably be jeeping that pipe also.
        iv. CNG construction dept (Bill Danko) set up demo for the purposes of showing inspector why jeeping is not required.
            1. Staff did not view the demo
            2. Staff provided documentation of CNG's own email which clearly stated they would always jeep prior to lowering into ditch, etc. (Chanda Merek email from 2010)
            3. CNG procedures require elec jeeping of pipe >4" – they intentionally violated their procedures – it was identified that this procedure was in their manual but they interpreted it differently than it read
            4. Tina Beach is over her head here – she is arguing engineering issues she doesn't understand. She signed a Refinery document identifying fact of no source of ignition allowed at refinery but didn't understand this meant no cameras/battery shots o- she had to be specifically warned – she needs training/OQ
8. 3rd and Kincaid – Mt Vernon Courthouse
    a. Supports appear okay – 1000 meter

FIELD INSPECTION @ Sedro Woolley
10.25.11

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

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.

Comments:

1. O-01 Odorizer
    a. Bldg entry not allowed during inspection – Staff id'd that this site would be visited but CNG did not secure structure / air/gas quality for entry in advance
    b. No fire extinguisher
    c. Casing vents
2. R-74
    a. 399 operating
    b. 389 standby
    c. 435 Relief
3. V-91 – appears okay
4. R-119 – new piggable
    a. 58 operating
    b. 54 standby
    c. 63 relief
    d. V-26/V-21
    e. Uncoated piping at station – bare steel to be replaced 12.2011 w/surface A/C

FIELD INSPECTION @ Fredonia
10.25.11

1. #83 Refinery
    a. Going for bids right now to sandblast and prime
    b. Intend to complete this year
    c. CNG identified they will assess pipe wall loss after sandblasting and prior to coating/painting
2. Horizontal vent @ PSE set
3. 290154
    a. Horizontal vent – plugged
    b. Upside down vent w/cap – appears okay

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

Number	Date	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

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

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.

		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
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-Gas Dispersion Models
ADB-10-08	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 N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
239.	.605(b) Procedures Section PV Will be addressed in Complaint items #2 and #6.					
240.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service Unit isolation will be done by the valves outside the building. No written procedures on isolation and purging before returning to service. CNG has identified that isolation is also automatic. How is purging completed - automatic? Not included in the procedures. Missing maintenance records for compressor station for 2008. Maintenance records for 2009 & 2010 are in folder.		x		
241.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units	x			
242.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (**1 per yr/15 months**), prompt repair or replacement No remote – manual operation. Bismark remote operation has been disabled.	x			
243.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings	x			
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: This is applicable – the station is 1340 hp. Requested gas detection and alarm system performance tests.	x			
246.		• **50% of the upright side areas** are permanently open, or Not applicable	x			
247.		• It is an unattended field compressor station of **1000 hp or less Not applicable**	x			

Comments:

Comments:

192.736 –

(a) Not later than September 16, 1996, each compressor building in a compressor station must have a fixed gas detection and alarm system, unless the building is-

(1) Constructed so that at least 50 percent of its upright side area is permanently open; or

(2) Located in an unattended field compressor station of 1,000 horsepower (746 kilowatts) or less.

(b) Except when shutdown of the system is necessary for maintenance under paragraph (c) of this section, each gas detection and alarm system required by this section must-

(1) Continuously monitor the compressor building for a concentration of gas in air of not more than 25 percent of the lower explosive limit; and

(2) If that concentration of gas is detected, warn persons about to enter the building and persons inside the building of the danger.

(c) Each gas detection and alarm system required by this section must be maintained to function properly. **The maintenance must include performance tests.**

Check Emergency Procedures Per 192.615:

a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(1) Receiving, identifying, and classifying notices of events which require immediate response by the operator.

(2) Establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials.

(3) Prompt and effective response to a notice of each type of emergency, including the following:

(i) Gas detected inside or near a building.

(ii) Fire located near or directly involving a pipeline facility.

(iii) Explosion occurring near or directly involving a pipeline facility.

(iv) Natural disaster.

(4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

(5) Actions directed toward protecting people first and then property.

(6) Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.

(7) Making safe any actual or potential hazard to life or property.

(8) Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.

(9) Safely restoring any service outage.

(10) Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.

(11) Actions required to be taken by a controller during an emergency in accordance with § 192.631.

(b) Each operator shall:

(1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures

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.

Comments:

established under paragraph (a) of this section as necessary for compliance with those procedures.
(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.
(3) Review employee activities to determine whether the procedures were effectively followed in each emergency.
(c) 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.

		COMPRESSOR STATION O&M PERFORMANCE AND RECORDS	S	U	N/A	N/C
248.	.709 Records Section	.731(a) Compressor Station Relief Devices (**1 per yr/15 months**) Reviewed 2008, 2009, 2010, usually done in November so no 2011 yet.	x			
249.		.731(c) Compressor Station Emergency Shutdown (**1 per yr/15 months**) Waiting for SCADA records	x			
250.		.736(c) Compressor Stations – Detection and Alarms (**Performance Test**) See Above Comment Section under (c)	x			

Comments: 1700,1720 and 1740 in folder.
PV: Requested OQ for Compressor Station Maintenance & Testing. WAC-013 (4) The equipment and facilities used by a gas pipeline company for training and qualification of employees must be similar to the equipment and facilities on which the employee will perform the covered task.

1. CNG provided OQ 1700/1720/1740DOT but none of these include operations and maintenance tasks.
2. CNG OQ covered tasks identify the Evaluator for the above 3 tasks as the Director of Field Operations (Steve Kessie) who would not be doing this acitivity. The actual evaluator was a representative from Interflux trainers from Alberta, Canada.
3. The DIF Analysis decision tree for operator qualification tasks for all of the above tasks identifies the subject matter expert as Ed White who retired in 2009 so a new subject matter expert needs to be assigned for this but also for procedures review.

CNG's main measurement staff person normally in charge of the Comp. Sta. may no longer be reporting to work due to illness – CNG recognizes that additional cross training to get someone up to speed is required and they are working on it. Interflux (Alberta, Canada) was brought in on 09.19-21.11 to do additional training (field operator training course). A transition from corp. office measurement to District occurred 2010. Tiffanny Urland , Dist. Mgr. is working with Interflux (training) to enhance and expand the level of maintenance they presently complete and improve skill levels of employees. Staff notes the training docs from Interflux.

		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	x			
252.	Field Section	Door latch must open from inside without a key	x			
253.		Doors must swing outward	x			
254.	(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit. One of the gates was pad-locked during maintenance/inspection on 10.25.11. Mentioned that CNG should open gate during use for emergency egress.	x			
255.		Each gate located within 200 ft of any compressor plant building must open outward	x			
256.		When occupied, the door must be opened from the inside without a key	x			
257.	(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?** No additional wiring post contstruction.	x			
258.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors? (a) Where entrained vapors in gas may liquefy under the anticipated pressure and temperature conditions, the compressor must be protected against the introduction of those liquids in quantities that could cause damage.	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) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
259.		(b)	Do the liquid separators have a manual means of removing liquids? (b) Each liquid separator used to remove entrained liquids at a compressor station must: (1) Have a manually operable means of removing these liquids. (2) Where slugs of liquid could be carried into the compressors, have either automatic liquid removal facilities, an automatic compressor shutdown device, or a high liquid level alarm; and, (3) Be manufactured in accordance with section VIII of the ASME Boiler and Pressure Vessel Code, except that liquid separators constructed of pipe and fittings without internal welding must be fabricated with a design factor of 0.4, or less.	x			
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?	x			
261.	.167	(a)	ESD system must:				
262.			- Discharge blowdown gas to a safe location	x			
263.			- Block and blow down the gas in the station	x			
264.			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers	x			
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	x			
269.			- ESD switches near emergency exits?	x			
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?	x			
271.		(c)	Are ESDs on platforms designed to actuate automatically by... On a platform located offshore or in inland navigable waters, N/A				
272.			- For unattended compressor stations, when:				
273.			▪ The gas pressure equals MAOP plus 15%?	x			
274.			▪ An uncontrolled fire occurs on the platform?	x			
275.			- For compressor station in a building, when				
276.			▪ An uncontrolled fire occurs in the building?	x			
277.			▪ 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			
278.	.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. No fire pumps	x			
279.		(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?	x			
280.		(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)? Yes.	x			
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? See #282	x			
282.		(e)	Are the mufflers equipped with vents to vent any trapped gas? Mark Worrell from Interflux identified the 2 revolutions occur after shutdown which is enough to expel exhaust and prevent trapped gas – no vents.	x			
283.	.173		Is each compressor station building adequately ventilated? to ensure that employees are not endangered by the accumulation of gas in rooms, sumps, attics, pits, or other enclosed places.	x			
284.	.457		Is all buried piping cathodically protected?	x			
285.	.481		Atmospheric corrosion of aboveground facilities	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) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
286.	.603 PV Will be addressed in Complaint items #2 and #6.	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? CNG is using an onsite start-up procedure but it is not part of the Company Procedures manual.		x		
287.		Are facility maps current/up-to-date?	x			
288.	.615 PV	Emergency Plan for the station on site? CNG has emergency plan but they were not on site.		x		
289.	.619 PV	Review pressure recording charts and/or SCADA Requested records May through October 2011. May provide telemetry in Kennewick on November 7, 2011.		x		
290.	.707	Markers	x			
291.	.731	Overpressure protection – relief's or shutdowns (a) Except for rupture discs, each pressure relieving device in a compressor station must be inspected and tested in accordance with §§192.739 and 192.743, and must be operated periodically to determine that it opens at the correct set pressure. (b) Any defective or inadequate equipment found must be promptly repaired or replaced. (c) Each remote control shutdown device must be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.	x			
292.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?	x			
293.		Is aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30?**	x			
294.	.736	Gas detection – location	x			

Comments: Below will be addressed in Complaint items #2 and #6.
PV – WAC-180 Plans and Procedures. CP 742 does not include maintenance tasks/procedure/monitoring of the two externally housed compressors which operate sta valves.
PV – WAC-180 Plans and Procedures. CP 742.06 – Procedure needs to be updated to identify the remote shutdown is inactive.
PV – WAC-180 Plans and Procedures. CP 742.091 – Procedure identifies a reference to Ellipse – update to JDE asset/maintenance mgmt. software. Will be addressed in Complaint items #2 and #6.
CNG will identify how/and on what forms they will be recording the Compressor Station Data and O&M info.