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

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

Inspection Report			
Docket Number	PG-110043		
Inspector Name & Submit Date	Dave Cullom/Kuang Chu 3/09/2011		
Chief Eng Name & Review/Date	Joe Subsits, March 10, 2011		
Operator Information			
Name of Operator:	Solvay Chemicals Inc.	**OP ID #:**	32399
Name of Unit(s):	Solvay Chemicals Hydrogen Pipeline		
Records Location:	3500 Industrial Way, Longview, WA 98632-9482		
Date(s) of Last (unit) Inspection:	11/18 – 11/20/2008	**Inspection Date(s):**	2/9/11-2/10/11

Inspection Summary:

This operator operates a 6" hydrogen pipeline for about 500 feet long. It originates at Equa Chlor plant inside the Weyerhaeuser plant boundary. After leaving the Weyerhaeuser plant fence, the hydrogen line crosses under a railroad track, a highway (Industrial Way), and over a drainage ditch, then under the Solvay's plant fence and terminates at an above ground insulating flange.

The relief valve set pressure on a pressure vessel at the source (Equa Chlor) is 150 psig. The vessel pressure relief was tested in November 2010 and is on a 5 year testing interval. The compressor at Equa Chlor has been tested, according to Equa Chlor records, and will not put out more than 65 psig. The normal operating pressure is below 60 psig at approximately 58.5 psig. The MAOP of the line is 150 psig. The pipeline was hydrostatically tested to 225 psig in 2007.

There was a concern in the previous inspection, conducted by Kuang Chu, about the absence of several line markers along the ROW. The markers have been replaced and permanently affixed by embedding the marker supports in concrete.

The pipeline is unodorized and is only being leaked surveyed by the operator's contractor every two months. WAC 480-93-188(3)(e) requires unodorized pipelines to be leak surveyed monthly. This finding will be noted in mailed correspondence to the operator and it was discussed with them during the exit interview on 2/10/11 and also via a phone conversation on 2/16/11.

HQ Address:		**System/Unit Name & Address:**	
3333 Richmond Ave. Houston, TX 77098		Solvay Chemicals Hydrogen Pipeline 3500 Industrial Way Longview, WA 98632-9482	
Co. Official:	Pascal Mansy	**Phone No.:**	(360)-577-7800
Phone No.:	(360)- 577-7800	**Fax No.:**	(360)-425-1163
Fax No.:	(360)-425-1163	**Emergency Phone No.:**	(360)-636-7796
Emergency Phone No.:	(360)-636-7796		

Persons Interviewed	Title	Phone No.
Mike Banigan	Manufacturing Manager/Site Coordinator	(360)-636-7793
Pascal Mansy	Engineering/Maintenance Manager	(360)-577-7800
Kevin O'Hogan	Gas Systems Supervisor	(503) 692-0995

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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:**	
X	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	**Date:**	11/18 – 11/20/2008

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GAS SYSTEM OPERATIONS			
Gas Supplier	Equa Chlor		
Services: *Residential* - 0 *Commercial* - 0 *Industrial 1* *Other* - 0			
Number of reportable safety related conditions last year 0		Number of deferred leaks in system 0	
Number of non-reportable safety related conditions last year 0		Number of third party hits last year 0	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 0		Miles of main within inspection unit(total miles and miles in class 3 & 4 areas)	
Operating Pressure(s):		**MAOP (Within last year)**	**Actual Operating Pressure** (At time of Inspection)
Feeder:	60 psig	150 psig	58.5
Town:	Longview		
Other:			
Does the operator have any transmission pipelines?	None		
Compressor stations? Use Attachment 1.	None		

Pipe Specifications:			
Year Installed (Range)	1988 (entire line replaced in 2006)	Pipe Diameters (Range)	6"
Material Type	Carbon Steel	Line Pipe Specification Used	ASTM A-53 Grade B
Mileage	500 feet	SMYS %	5%

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** 03/10/2011

Integrity Management Field Validation

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

	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. ***Notes - Not required to report GIS data under current guidelines***			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? ***Notes - Not required to report GIS data under current guidelines***			X	
3.	191.5	Any incidents requiring telephonic reporting to the **NRC (800-424-8802)** ***Notes – No incidents***	X			

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		REPORTING RECORDS	S	U	N/A	N/C
4.	191.15	Written reports; supplemental reports to PHMSA **(Form F7100.2)** ****Notes – Not a transmission company****			X	
5.	191.23	Filing the **Safety Related Condition Report** within 5 days of determination, but not later than 10 days after discovery *****Notes – No occurrences *****			X	
6.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports *****Notes – No facilities meeting these criteria*****			X	
7.	480-93-200(1)	Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9146** (Within **2 hours**) for events which results in;				
8.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; *****Notes – No occurrences *****			X	
9.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; *****Notes – No occurrences *****			X	
10.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; *****Notes – No occurrences *****			X	
11.	480-93-200(1)(d)	The unintentional ignition of gas; *****Notes – No occurrences *****			X	
12.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; *****Notes – No occurrences *****			X	
13.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; *****Notes – No occurrences *****			X	
14.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; *****Notes – No occurrences *****			X	
15.	480-93-200(2)	Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9146** (Within **24 hours**) for; *****Notes – No occurrences *****				
16.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; *****Notes – No occurrences *****			X	
17.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; ** ***Notes: The operator is not a distribution company.*****			X	
18.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or ** ***Notes: The operator is not a distribution company and has no other customers.*****			X	
19.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP *****Notes – No occurrences *****			X	
20.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
21.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; *****Notes – No occurrences *****			X	
22.	480-93-200(4)(b)	The extent of injuries and damage; *****Notes – No occurrences *****			X	
23.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; *****Notes – No occurrences *****			X	
24.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; *****Notes – No occurrences *****			X	
25.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; *****Notes – No occurrences *****			X	
26.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; *****Notes – No occurrences *****			X	
27.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; *****Notes – No occurrences *****			X	
28.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; *****Notes – No occurrences *****			X	
29.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; *****Notes – No occurrences *****			X	
30.	480-93-200(4)(j)	Line type; *****Notes – No occurrences *****			X	
31.	480-93-200(4)(k)	City and county of incident; and *****Notes – No occurrences *****			X	

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		REPORTING RECORDS	S	U	N/A	N/C
32.	480-93-200(4)(l)	Any other information deemed necessary by the commission. ***Notes – No occurrences *****			X	
33.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted ***Notes – No occurrences *****			X	
34.	480-93-200(6)	Written report within 5 days of receiving the **failure analysis** of any incident or hazardous condition due to **construction defects or material failure** ***Notes – No occurrences *****			X	
35.	480-93-200(7)	**Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year				
36.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety ** ***Notes: The operator type is "other" so it will use the distribution annual report..***	X			
37.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
38.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; ***Notes – No locate requests made of Solvay *****			X	
39.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and			X	
40.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other. ***Notes – No occurrences *****			X	
41.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. ***Notes – No occurrences *****			X	
42.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
43.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. ***Notes: There are no daily construction reports. However, UTC will be notified if there are repair activities.***			X	
44.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required ***Notes: Per 199.119, the MIS report is not required as the number of covered employees are fewer than 50.***			X	

Comments:

		CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION	S	U	N/A	N/C
45.	192.16	**Customer notification** - Customers notified, within **90 days**, of their responsibility for those service lines not maintained by the operator ***Notes: The operator is not a local distribution company (LDC).***			X	
46.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? ***Notes: The operator is not a local distribution company (LDC).***			X	

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		CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION	S	U	N/A	N/C
47.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? ***Notes: The operator is not a local distribution company (LDC).***			X	

Comments:

		CONSTRUCTION RECORDS	S	U	N/A	N/C
48.	480-93-013	OQ records for personnel performing New Construction covered tasks ***Notes – No new construction ***			X	
49.	192.225	Test Results to Qualify Welding Procedures ***Notes – No welding has been performed, but only qualified contractors will be used if welding does occur . ***			X	
50.	192.227	Welder Qualification ***Notes – No welding has been performed, but only qualified contractors will be used if welding does occur . ***			X	
51.	480-93-080(1)(b)	Appendix C Welders re-qualified **2/Yr (7.5Months)** ***Notes: The contractor does not use Appendix C for welding the 6" line.***			X	
52.	480-93-080(2)	Plastic pipe joiners re-qualified **1/Yr (15 Months)** ***Notes: The operator does not use plastic pipe.***			X	
53.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period ***Notes: The operator does not use plastic pipe.***			X	
54.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners **1/Yr (12Months)** ***Notes: The operator does not use plastic pipe.***			X	
55.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 ***Notes –No unvented casings are installed***			X	
56.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains ***Notes –This line has been classified as a distribution line ***			X	
57.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services ***Notes: The operator has no services.***			X	
58.	192.241(a)	Visual Weld Inspector Training/Experience ** **7/3/2009 Kevin O'Hogan.** **	X			
59.	192.243(b)(2)	Nondestructive Technician Qualification ***Notes – No welding or construction has occurred ***			X	
60.	192.243(c)	NDT procedures ***Notes – No welding or construction has occurred ***			X	
61.	192.243(f)	Total Number of Girth Welds ***Notes – No welding or construction has occurred ***			X	
62.	192.243(f)	Number of Welds Inspected by NDT ***Notes – No welding or construction has occurred ***			X	
63.	192.243(f)	Number of Welds Rejected ***Notes – No welding or construction has occurred ***			X	
64.	192.243(f)	Disposition of each Weld Rejected ***Notes – No welding or construction has occurred ***			X	
65.	192.303	Construction Specifications ***Notes – No welding or construction has occurred ***			X	
66.	192.325	Underground Clearance ***Notes – No welding or construction has occurred ***			X	
67.	192.327	Amount, location, cover of each size of pipe installed ***Notes – No welding or construction has occurred ***			X	
68.	480-93-160(1)	Report filed **45 days** prior to construction or replacement of transmission pipelines **≥ 100** feet in length ***Notes: This is not a transmission pipeline.***			X	

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		CONSTRUCTION RECORDS	S	U	N/A	N/C
69.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: ***Notes: This is not a transmission pipeline.***			X	
70.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; ***Notes: This is not a transmission pipeline.***			X	
71.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. ***Notes: This is not a transmission pipeline.***			X	
72.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed ***Notes: This is not a transmission pipeline.***			X	
73.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; ***Notes: This is not a transmission pipeline.***			X	
74.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. ***Notes: This is not a transmission pipeline.***			X	
75.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; ***Notes: This is not a transmission pipeline.***			X	
76.	480-93-160(2)(g)	Welding specifications; and ***Notes: This is not a transmission pipeline.***			X	
77.	480-93-160(2)(h)	Bending procedures to be followed if needed. ***Notes: This is not a transmission pipeline.***			X	
78.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ **20% SMYS**? ***Notes: This pipeline is at 5%SMYS.***			X	
79.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) ***Notes – No construction or repairs have occurred in this inspection time period **			X	
80.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? ***Notes: Multiple tests not performed.***			X	
81.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) ***Notes – No construction or repairs have occurred in this inspection time period **			X	
82.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > **60 psig** ***Notes – No construction or repairs have occurred in this inspection time period **			X	
83.	480-93-175(4)	Leak survey within **30 days** of moving or lowering pipelines ≤ **60 psig** ***Notes – No construction or repairs have occurred in this inspection time period **			X	

Comments:

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
84.	192.517(a)	Pressure Testing (operates at or above 100 psig) – **useful life of pipeline** ***Notes – NOP of the pipeline is 58.5 to 60psig **			X	
85.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – **5 years**	X			

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		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
86.	192.605(a)	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	X			
87.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	X			
88.	480-93-018(3)	Records, including maps and drawings updated within **6 months** of completion of construction activity? ***Notes – No construction or repairs have occurred in this inspection time period **			X	
89.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures	X			
90.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures	X			
91.	192.609	Class Location Study (**If applicable**) ***Notes –Not a transmission line***			X	
92.	192.614	**Damage Prevention (Operator Internal Performance Measures)**				
93.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)	X			
94.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?	X			
95.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	X			
96.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			
97.		Review operator locating and excavation procedures for compliance with state law and regulations.	X			
98.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ***Notes – No locates were requested of Solvay's contractor for this facility during this inspection time period**			X	
99.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
100.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys?	X			
101.		**Informational purposes only. Not Required.** Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do **Y** **N** X	X			

Comments:

			S	U	N/A	N/C
102.		**Emergency Response Plans**				
103.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) **Note:** Review operator records of previous accidents and failures including third-party damage and leak response	X			
104.	192.615(b)(1)	Location Specific Emergency Plan	X			
105.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training	X			
106.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	X			
107.	192.615(c)	Liaison Program with Public Officials	X			
108.	192.616	**Public Awareness Program**				
109.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:	X			
110.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.				
111.		**API RP 1162 Baseline* Recommended Message Deliveries**				
112.						

Stakeholder Audience (LDC's)	**Baseline Message Frequency (starting from effective date of Plan)**
Residence Along Local Distribution System	Annual
LDC Customers	Twice annually
One-Call Centers	As required of One-Call Center
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual
Stakeholder Audience (Transmission line operators)	**Baseline Message Frequency (starting from effective date of Plan)**
Residence Along Local Distribution System	2 years
One-Call Centers	As required of One-Call Center
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual

113.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.				
114.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.	X			
115.	.616(h)	IAW API RP 1162. the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. 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) *****Notes – The operator was not jurisdictional in 2005*****			X	
116.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. *****Notes – This facility is not a master meter or a petroleum gas system*****			X	

117.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 **Note:** Including excavation damage (PHMSA area of emphasis) ***Notes – No accidents or failures have occurred in this inspection time period **			X	

Comments: The operator is a member of the Local Emergency Planning Committee which holds public meetings and has achieved Responsible Care Management System (RCMS) certification. RCMS has criteria that address public awareness issues.

118.	192.619/621/623	Maximum Allowable Operating Pressure (**MAOP**) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)	X			
119.	480-93-015(1)	Odorization of Gas – Concentrations adequate ***Notes: The gas is not odorized.***			X	
120.	480-93-015(2)	Monthly Odorant Sniff Testing ***Notes: The gas is not odorized.***			X	
121.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements ***Notes: The gas is not odorized.***			X	
122.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) ***Notes: The gas is not odorized.***			X	
123.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months)**	X			
124.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days?**	X			
125.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on ***Notes: No service regulators.***			X	
126.	480-93-155(1)	Up-rating of system MAOP to **>60 psig**? Procedures and specifications submitted **45 days** prior? ***Notes: System MAOP already at 150psig.***			X	
127.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? ***Notes – No leaks have occurred in this inspection time period **			X	
128.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; ***Notes – No leaks have occurred in this inspection time period **			X	
129.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? ***Notes – No leaks have occurred in this inspection time period **			X	
130.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within **30 days** of a leak repair? ***Notes – No leaks have occurred in this inspection time period **			X	
131.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? ***Notes – No leaks have occurred in this inspection time period **			X	
132.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) ***Notes – No leaks have occurred in this inspection time period **			X	
133.	480-93-188(1)	Gas leak surveys	X			
134.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X			
135.	480-93-188(3)	Leak survey frequency **(Refer to Table Below)** ***Notes – The leak survey frequency per 480-93-188(3)(e) is not being performed once monthly. The operator leak surveys every two months **		X		

		Business Districts **(implement by 6/02/07)**	**1/yr (15 months)**			
		High Occupancy Structures	**1/yr (15 months)**			
		Pipelines Operating ≥ 250 psig	**1/yr (15 months)**			
		Other Mains: CI, WI, copper, unprotected steel	**2/yr (7.5 months)**			
136.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs ***Notes – No street alterations or repairs have occurred in this inspection time period **			X	
137.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred ***Notes – No construction has occurred in this inspection time period **			X	
138.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected ***Notes – No erosion, slides, or soil subsidence has occurred in this inspection time period **			X	
139.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions ***Notes – No unusual activity has occurred during this inspection time period **			X	
140.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in ***Notes – No third-party damage has occurred in this inspection time period **			X	
141.	480-93-188(5)	Gas Survey Records **(Min 5 yrs)** and at a minimum include required information listed under 480-93-188 (5) (a-f)	X			
142.	480-93-188(6)	Leak program - Self Audits ***Notes – No leaks have occurred in this inspection time period **			X	
143.	192.709	Patrolling (Transmission Lines) **(Refer to Table Below)** .705***Notes – Not a transmission line **			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)**

144.	192.709	Leak Surveys (Transmission Lines) **(Refer to Table Below)** .706***Notes – Not a transmission line **			X	

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

145.	192.603(b)	Patrolling Business District **(4 per yr/4½ months)** ***Notes: The operator is not a LDC.**			X	
146.	192.603(b)	Patrolling Outside Business District **(2 per yr/7½ months)** 192.721(b)(2) ***Notes: The operator is not a LDC.**			X	
147.	192.603(b)	Leakage Survey - Outside Business District **(5 years)** 192 .723(b)(1) ***Notes: The operator is not a LDC.**			X	
148.	192.603(b)	Tests for Reinstating Service Lines 192.725 ***Notes: The operator is not a LDC.**			X	
149.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 ***Notes: There are no underwater facilities .**			X	
150.	192.709	Pressure Limiting and Regulating Stations **(1 per yr/15 months)** .739** *Notes: There are no pressure relieving and limiting stations.**			X	
151.	192.709	Pressure Limiting and Regulator Stations – Capacity **(1 per yr/15 months)** .743 ***Notes: There are no pressure relieving and limiting stations.**			X	

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152.	192.709	Valve Maintenance – Transmission (**1 per yr/15 months**) .745 ***Notes: There are no transmission line valves.***			X	
153.	192.709	Valve Maintenance – Distribution (**1 per yr/15 months**) .747 ***Notes: There are no distribution line valves.***			X	
154.	480-93-100(3)	Service valve maintenance (**1 per yr/15 months**) ***Notes: There are no service line valves.***			X	
155.	192.709	Vault maintenance (**≥200 cubic feet**)(**1 per yr/15 months**) .749 ***Notes: There are no vaults.***			X	
156.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751	X			
157.	192. 603(b)	Welding – Procedure 192.225(b) 747 ***Notes: No welding has occurred since installation***			X	
158.	192. 603(b)	Welding – Welder Qualification 192.227/.229***Notes: No welding has occurred since installation***			X	
159.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) ***Notes: No welding has occurred since installation***			X	
160.	192.709	NDT Records (**pipeline life**) .243(f)	X			
161.	192.709	Repair: pipe (**pipeline life**); Other than pipe (**5 years**)	X			
162.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) ***Notes: This is not a transmission line.***			X	

Comments:

CORROSION CONTROL RECORDS			**S**	**U**	**N/A**	**N/C**
163.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	X			
164.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)*	X			
165.	192.465(a)	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**)	X			
166.	192.491	Maps or Records .491(a)	X			
167.	192.491	Examination of Buried Pipe when exposed .459 ***Notes – Has not been exposed***			X	
168.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed ***Notes – Has not been exposed***			X	
169.	192.491	Annual Pipe-to-soil monitoring (**1 per yr/15 months**) .465(a)	X			
170.	192.491	Rectifier Monitoring (**6 per yr/2½ months**) .465(b)	X			
171.	192.491	Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c) ***Notes – No interference bonds***			X	
172.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c) ***Notes – No interference bonds***			X	
173.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
174.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation.	X			
175.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/39 months**) .465(e) ***Notes – The entire pipeline is protected by an impressed current CP system***			X	

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		CORROSION CONTROL RECORDS	S	U	N/A	N/C
176.	192.491	Electrical Isolation (**Including Casings**) .467	X			
177.	480-93-110(5)	Casings inspected/tested annually not to exceed **fifteen months**	X			
178.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods ***Notes – All casings have test leads***			X	
179.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within **90 days** ***Notes – No shorts identified during this inspection period***			X	
180.	480-93-110(5)(c)	Casing shorts cleared when practical ***Notes – No shorts identified during this inspection period***			X	
181.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. **Twice annually/7.5 months** ***Notes – No shorts identified during this inspection period***			X	
182.	192.491	Interference Currents .473	X			
183.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) ***Notes – They are using pure Hydrogen gas***			X	
184.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) ***Notes – No pipe replaced during this inspection period***			X	
185.	192.491	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) .477 ***Notes – No pipe replaced during this inspection period***			X	
186.	192.491	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481	X			
187.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485***Notes – No pipe replaced during this inspection period***			X	

Comments:

		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
188.	192.161	Supports and anchors	X			
189.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? ***Notes – No pipe was welded during this inspection period***			X	
190.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	X			
191.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? ***Notes: There are no plastic fittings.***			X	
192.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. ***Notes – No pipe was welded during this inspection period***			X	
193.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified? ***Notes – No new construction was performed during this inspection period***			X	
194.	480-93-015(1)	Odorization***Notes – This is hydrogen gas and it is unodorized***			X	
195.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel? ***Notes – There have been no map updates since the commissioning of the pipeline system***			X	
196.	192.179	Valve Protection from Tampering or Damage ***Notes: There are no transmission line valves.***			X	
197.	192.455	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	X			
198.	192.463	Levels of cathodic protection	X			
199.	192.465	Rectifiers	X			
200.	192.467	CP - Electrical Isolation	X			

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		PIPELINE INSPECTION (Field)	S	U	N/A	N/C
201.	192.476	Systems designed to reduce internal corrosion	X			
202.	192.479	Pipeline Components exposed to the atmosphere	X			
203.	192.481	Atmospheric Corrosion: monitoring	X			
204.	192.491	Test Stations – Sufficient Number .469	X			
205.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
206.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed? ***Notes – Not a main or transmission line***			X	
207.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? ***Notes: There are no service lines.***			X	
208.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
209.	192.605	Knowledge of Operating Personnel	X			
210.	480-93-124	Pipeline markers	X			
211.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days?**	X			
212.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**) ***Notes – No pretested pipe on site***			X	
213.	192.195	Overpressure protection designed and installed where required?	X			
214.	192.739/743	Pressure Limiting and Regulating Devices (**Mechanical/Capacities**) ***Notes – The compressor at Equa Chlor has been tested, according to Equa Chlor records, and will not put out more than 65 psig. The pressure vessel near the compressor source has a PSV set at the MAOP of 150 and was tested in November 2010.***			X	
215.	192.741	Telemetering, Recording Gauges ***Notes –This is not a distribution system***			X	
216.	192.751	Warning Signs	X			
217.	192.355	Customer meters and regulators. Protection from damage ***Notes: There are no service lines, meters, or regulators.***			X	
218.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. ***Notes: There are no pits and vaults.***			X	
219.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? ***Notes: There are no service lines, meters, or regulators.***			X	
220.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) ***Notes: There are no plastic piping components.***			X	
221.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	X			
222.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
223.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? **Yes** **No** X				
224.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? ***Notes: There are no plastic piping components.***			X	
225.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? ***Notes: There are no plastic piping components.***			X	
226.	192.745	Valve Maintenance (Transmission) ***Notes: This is not a transmission pipeline.***			X	
227.	192.747	Valve Maintenance (Distribution) ***Notes: The upstream valve is owned by Equachlor.***			X	

Facility Sites Visited:

Facility Type	Facility ID Number	Location

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

Comments:

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

Number	Date	Subject
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-08-01	May 13, 2008	Pipeline Safety - Notice to Operators of Gas Transmission Pipelines on the Regulatory Status of Direct Sales Pipelines
ADB-08-02	March 4, 2008	Pipeline Safety - Issues Related to Mechanical Couplings Used in Natural Gas Distribution Systems
ADB-08-03	March 10, 2008	Pipeline Safety - Dangers of Abnormal Snow and Ice Build-Up on Gas Distribution Systems
ADB-08-04	June 5, 2008	Pipeline Safety - Installation of Excess Flow Valves into Gas Service Lines
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple

		Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

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

Attachment 1
Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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		COMPRESSOR STATION PROCEDURES ***Notes: There are no compressor stations on this pipeline system.***	S	U	N/A	N/C
228.	.605(b)					
229.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
230.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			X	
231.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (**1 per yr/15 months**), prompt repair or replacement			X	
232.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
233.		(b) Tank must be protected according to **NFPA #30**			X	
234.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (**must be performance tested**), unless:			X	
235.		• **50% of the upright side areas** are permanently open, or			X	
236.		• It is an unattended field compressor station of **1000 hp or less**			X	

Comments:

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

Comments:

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

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

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

Comments: