POST INSPECTION MEMORANDUM

Inspector: Al Jones/WUTC
Reviewed: David Lykken/WUTC
Reviewed: Tom Finch/ PHMSA10/07/09
Follow-Up Enforcement: Violations:
PCO* and LOC 10/12/09
Director Approval* PCO AND LOC

Date: October 2, 2009

Operator Inspected: **OPID:** 15014 **Region:** Western
TransCanada
U.S. Western Pipe Region
1400 SW 5th Ave
Suite 900
Portland, OR 97201

Unit Address:
Rosalia District
534 E. Spokane Fall Blvd.
Spokane, WA 99202

Unit Inspected: Rosalia District **Unit ID:** 66685
Unit Type: Interstate Natural Gas
Inspection Type: I01 – **(6.0)** Abbreviated Procedures Standard Inspection, I08 - **(1.5)** OQ Field Verification, and I07 – **(0.5)** IMP Field Verification & Follow up
Record Location: Spokane, WA
Inspection Dates: August 24-27 and September 8-11, 2009
AFOD: 8 (I01 – 6.0, I08 – 1.5, and I07 – 0.5)
SMART Activity Number: 124002

Operator Contact: Kurt Smith, Pipe Regulatory Specialist
Phone: (509) 533-2832 **Fax:** (509) 546-8825 **Emergency:** (800) 447-8066

Unit Description:
The Rosalia District is located in Eastern Washington extending south from Spokane at the Idaho/Washington border south to the Snake River crossing. The pipeline is approximately 100 miles in length in Spokane and Whitman Counties. The transmission lines are primarily in Class 1 Location, except the Spokane Valley contains approximately 14 miles of Class 2 Location and approximately 7 miles of Class 3 Location. The District includes a compressor station and main line block valves.

Facilities Inspected:
The portion of the District inspected include the 36-inch and two 42-inch diameter pipelines from the Washington/Idaho border (MP106.8) to the Spokane Gate Station (MP 108.2) and two

south bound pipelines, 36 and 42 inch from the Spokane Gate to the Snake River (MP 206.7). The compressor station includes a Mars Solar (14K Hp), Titan Solar (19.5Hp), and a LM-1500, GE (12.5 Hp) turbines. Meter Station located at Spokane, Mica, Spangle, Rosalia, and St. John were inspected for set pints, lockup, MAOP, and security. During the right-of-way inspection, the line markers were inspected for emergency information, at C/P test sites, casings, and rectifier units including numerous pipe-to-soil reading and are documented in the Field Data Report. The District's rectifiers had been turned off for approximately four week prior to the inspection and turned on during the last field day. The pipe-to-soil C/P readings were taken at the same location as the 2007 inspection, but with the rectifiers turned off, the data varies from poor to questionable.

Persons Interviewed:

Kurt Smith	Pipe Regulatory Specialist	(509) 533-2832
James Olson	Rosalia Technician	(509) 533-2832
Patrick Brown	Rosalia Technician	(509) 533-2832

Probable Violations/Concerns:
One probable violation was identified and three areas of concerns are addressed.

1) **§192.465 (d) External corrosion control: Monitoring**

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

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

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

During the 2009 field inspection, the same 6-inch looped pipe had a pipe-to-soil potential of -210 mv DC, off. The rectifier was off for approximately the past four weeks to measure the District's native potentials. Mr. Kurt Smith said a work order was scheduled for this year, 2009, to install anodes in proximity to the looped pipes and no remediation on the piping has been completed since 2007.

Areas of Concerns (Letter of Concern items):

1) The field staff for TransCanada, Rosalia District did not have current field maps such as alignment sheets for identifying pipe data, foreign crossings, and locations of laterals. The existing alignment sheets were last updated in 2002. The District Office has a computer based mapping system with current mapping information that is available to the staff, but no printer.

2) The Control room at the Rosalia Compressor Station uses un-odorized natural gas for domestic heating and hot water located in the auxiliary/utility room. The room has a gas sensor and alarm, but the alarm does not register in the control room to alert staff of a potential gas leak.

3) The fuel line to the Control room at the Rosalia Compressor Station had a pipe-to-soil potential of -5.328 v DC, on. This potential is too high and may have damaged the pipe coating.

Follow up on the history of prior offenses that are still open:

Prior Offenses (for the past 5 years)		
CPF #	**What type of open enforcement action(s)?**	**Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)**

Recommendations:
Issue NOPV with Compliance Order for probable violation noted
Issue Letter of Concern for AOC's noted. CA regs or Con conn
Maintain normal inspection cycle.

Comments: None

Attachments:
-Abbreviated Procedures/ Standard Inspection Form 1
-Gas IMP Field Verification Inspection Form 14
-Operator Qualification Field Inspection Protocol Form 15
-Supplemental SCC Questionnaire Form 17
-Field Data Collection Form
-Safety Violation Report