

**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			
<b>Docket Number</b>	PG-100051		
<b>Inspector Name &amp; Submit Date</b>	Al Jones, June 30, 2010		
<b>Sr. Eng Name &amp; Review/Date</b>	D.Lykken, July 1, 2010		
Operator Information			
<b>Name of Operator:</b>	Northwest Natural Gas Company	<b>OP ID #:</b>	13840
<b>Name of Unit(s):</b>	Clark County District	<b>UNIT ID #:</b>	
<b>Records Location:</b>	Portland, Oregon 97209		
<b>Date(s) of Last (unit) Inspection:</b>	May 2006	<b>Inspection Date(s):</b>	June 14-18, 2010

**Inspection Summary:**

Northwest Natural provides natural gas service to Clark County including: Vancouver, Camas, Washougal, Ridgefield, Battle Ground, and La Center, Washington.

Cover letter and final report to: (Verify contacts?????)

M.S. McCoy, Exe. Vice President of Customer & Utility Operations. Courtesy copy to Bruce Paskett & Jodi Wright. MW

<b>HQ Address:</b> Northwest Natural Gas Company 220 Northwest Second Avenue Portland, Oregon 97209	<b>System/Unit Name &amp; Address:</b> Clark County District 6600 NE 112 <sup>th</sup> Ct Suite 101, Vancouver, WA 98662
<b>Co. Official:</b> Mr. Grant M. Yoshihara Vice President Operations	<b>Phone No.:</b> 503-226-4211
<b>Phone No.:</b> 503-226-4211 Ext. 2374	<b>Fax No.:</b>
<b>Fax No.:</b> 503-273-4822	<b>Emergency Phone No.:</b> 800-800-422-4012
<b>Emergency Phone No.:</b> 800-800-422-4012	

Persons Interviewed	Title	Phone No.
Darlene Maurer	Pipeline Safety Compliance Specialist	503-226-4211 Ext 4391
Roy Roger	Integrity Management Engineer	503-226-4211 Ext 4362
Bob Anderson	Construction Field Supervisor	360-571-5465 Ext 2060
Sheri L. Clark	Clark County Engineer	360-571-5465 Ext 2045
Gary F. Hyatt	Damage Prevention Program Manager	503-226-4211 Ext 4320
Doug Martin	Leakage Supervisor	503-226-4211 Ext 4427
James Greger	Welding Inspector Qualifications Assurance	503-226-4211 Ext 4341
Cory Beck	Consumer Information & Internet Services Manager	503-220-2576

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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)

<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	March 2007

**GAS SYSTEM OPERATIONS**

<b>Gas Supplier</b>	Williams Natural Gas		
<b>Services:</b> See Annual Report. NW Natural has about 64,687 gas services. <i>Residential    Commercial    Industrial    Other</i>			
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	2 in 2009
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	42 in 2009
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	3 miles	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)	1,685 miles total in Washington
<b>Operating Pressure(s):</b>		<b>MAOP (Within last year)</b>	<b>Actual Operating Pressure (At time of Inspection)</b>
Feeder:	Distribution High Pressure	About 250 psig	About 175 to 205 psig
Town:	Distribution Standard Delivery	Less than and equal to 60 psig	Less than and equal to 60 psig
Other:	Transmission Line	530 psig	About 400 psig
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 1.	No		

<b>Pipe Specifications:</b>			
Year Installed (Range)	1849 to 2010	Pipe Diameters (Range)	½ inch thru 12-inch
Material Type	PE & Steel	Line Pipe Specification Used	API 5L, PSL 2 Steel Pipe
Mileage	See Annual Report	SMYS %	Transmission 26.2%, 8" diam.

**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**    Completed Form was uploaded June 22, 2010

**Integrity Management Field Validation**

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

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REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	<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</b> Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to <a href="mailto:opsgis@rspa.dot.gov">opsgis@rspa.dot.gov</a> stating that fact.</u> 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?	X			
3.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802)			X	
4.	191.15	Written reports; supplemental reports to PHMSA (Form F7100.2)			X	
5.	191.23	Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery			X	
6.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports			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;			X	
9.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars;			X	
10.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	X			
11.	480-93-200(1)(d)	The unintentional ignition of gas;			X	
12.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	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;			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;	X			
15.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
16.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			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;			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	X			
19.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP			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;			X	
22.	480-93-200(4)(b)	The extent of injuries and damage;	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;	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;	X			
25.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
26.	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site;	X			
27.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
28.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
29.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			

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REPORTING RECORDS			S	U	N/A	N/C
30.	480-93-200(4)(j)	Line type;	X			
31.	480-93-200(4)(k)	City and county of incident; and	X			
32.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
33.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	X			
34.	480-93-200(6)	Written report within 5 days of receiving the <b>failure analysis</b> of any incident or hazardous condition due to <b>construction defects or material failure</b>			X	
35.	480-93-200(7)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> 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	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;	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) Excavator failed to call for locate.	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.	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.	X			
44.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

**Comments:**

Questions: 3-9, 11, 13, 16-17, 19-20, & 34:  
There has been no NRC reportable incidents or Safety Related condition Reports.

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
45.	192.16	<b>Customer notification</b> - Customers notified, within <b>90 days</b> , of their responsibility for those service lines not maintained by the operator SPW 482.3	X			
46.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? SPW 381.3.1	X			
47.	192.383	Does the operator have a voluntary installation program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? Yes, all new and upgraded services are equipped with an EFV.	X			
48.	192.383	If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate?			X	

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**Comments:**  
 Definition: SPW = Standard Practices of Washington  
 Question 48: A voluntary program is in place. SPW 381.2.

CONSTRUCTION RECORDS			S	U	N/A	N/C
49.	480-93-013	OQ records for personnel performing New Construction covered tasks	X			
50.	192.225	Test Results to Qualify Welding Procedures SPW 221.3	X			
51.	192.227	Welder Qualification API 1104, Section 6	X			
52.	480-93-080(1)(b)	Appendix C Welders re-qualified <b>2/Yr (7.5Months)</b>	X			
53.	480-93-080(2)	Plastic pipe joiners re-qualified <b>1/Yr (15 Months) SPW 251.3</b>	X			
54.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	X			
55.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners <b>1/Yr (12Months)</b> <b>NWN re-qualifies jointers and does not tracking.</b>	X			
56.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 <b>SPW 467.3.1.3</b>	X			
57.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains	X			
58.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
59.	192.241(a)	Visual Weld Inspector Training/Experience	X			
60.	192.243(b)(2)	Nondestructive Technician Qualification	X			
61.	192.243(c)	NDT procedures		X		
62.	192.243(f)	Total Number of Girth Welds	X			
63.	192.243(f)	Number of Welds Inspected by NDT	X			
64.	192.243(f)	Number of Welds Rejected	X			
65.	192.243(f)	Disposition of each Weld Rejected			X	
66.	192.303	Construction Specifications	X			
67.	192.325	Underground Clearance	X			
68.	192.327	Amount, location, cover of each size of pipe installed	X			
69.	480-93-160(1)	Report filed <b>45 days</b> prior to construction or replacement of transmission pipelines <b>≥ 100</b> feet in length			X	
70.	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:			X	
71.	480-93-160(2)(a)	Description and purpose of the proposed pipeline;			X	
72.	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	
73.	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	
74.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed;			X	
75.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route.			X	
76.	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;			X	
77.	480-93-160(2)(g)	Welding specifications; and			X	
78.	480-93-160(2)(h)	Bending procedures to be followed if needed.			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
79.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress $\geq$ 20% SMYS?			X	
80.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h)			X	
81.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed?			X	
82.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule)			X	
83.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig			X	
84.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines $\leq$ 60 psig			X	

**Comments:**

Definition: SPW = Standard Practices of Washington

Questions 65, 69-84:

No major construction projects, except in 2008 two 8-inch diameter PBV ball valves in Clark County were repaired for defective trunnion cap screws.

Question 61:

SPW 223.3.7.2 states, "Perform NDT of welds in accordance with written procedures ..." The Standard does not specify a standard for radiographs. For example, radiographically examined welds shall meet the standards of acceptability of API Standard 1104.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
85.	192.517(a)	Pressure Testing (operates at or above 100 psig) – <b>useful life of pipeline</b>	X			
86.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – <b>5 years</b>	X			
87.	192.605(a)	Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> ) <b>Note:</b> Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09	X			
88.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	X			
89.	480-93-018(3)	Records, including maps and drawings updated within <b>6 months</b> of completion of construction activity?	X			
90.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures	X			
91.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures	X			
92.	192.609	Class Location Study (If applicable) SPW 613.3.2	X			
93.		<b>Damage Prevention (Operator Internal Performance Measures)</b>				
94.		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			
95.	192.614	Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?	X			
96.		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			
97.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			

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<b>OPERATIONS and MAINTENANCE RECORDS</b>		<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
98.	Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
99.	Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
100.	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
101.	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			
102.	<b>Informational purposes only. Not Required.</b> Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at <a href="https://identity.damagereporting.org/cgareg/control/login.do">https://identity.damagereporting.org/cgareg/control/login.do</a> Y X N	X			

**Comments:**

		<b>Emergency Response Plans</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
103.						
104.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response	X			
105.	192.615(b)(1)	Location Specific Emergency Plan	X			
106.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training	X			
107.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	X			
108.	192.615(c)	Liaison Program with Public Officials	X			
109.	192.616	<b>Public Awareness Program</b>				
110.	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			
111.		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.				

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112.		<b>API RP 1162 Baseline* Recommended Message Deliveries</b>					
113.		<b>Stakeholder Audience (LDC's)</b>		<b>Baseline Message Frequency (starting from effective date of Plan)</b>			
		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			
		<b>Stakeholder Audience (Transmission line operators)</b>		<b>Baseline Message Frequency (starting from effective date of Plan)</b>			
		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			
		114.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.			
115.	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			
116.	.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. <u>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.</u> .616(h)		X			
117.	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.				X	
118.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 <b>Note:</b> Including excavation damage (PHMSA area of emphasis)				X	

**Comments:**  
Question 117:  
NWN does not operate Master Meter or petroleum gas systems in Clark County.

Question 118:  
NWN has not required laboratory analysis to determine cause and prevention of recurrence of pipe failures.



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119.	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) SPW 625.2	X											
120.	480-93-015(1)	Odorization of Gas – Concentrations adequate SPW 625.2	X											
121.	480-93-015(2)	Monthly Odorant Sniff Testing	X											
122.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements	X											
123.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) SPW 625.3.4	X											
124.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? <b>1/yr(15 months)</b>	X											
125.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b>	X											
126.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on CFM 701.6	X											
127.	480-93-155(1)	Up-rating of system MAOP to <b>&gt;60 psig?</b> Procedures and specifications submitted <b>45 days</b> prior?	X											
128.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	X											
129.	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;	X											
130.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained?	X											
131.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within <b>30 days</b> of a leak repair?	X											
132.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? SPW 709.3.4	X											
133.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X											
134.	480-93-188(1)	Gas leak surveys	X											
135.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	X											
136.	480-93-188(3)	Leak survey frequency ( <b>Refer to Table Below</b> )	X											
<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td>Business Districts (<b>implement by 6/02/07</b>)</td> <td><b>1/yr (15 months)</b></td> </tr> <tr> <td>High Occupancy Structures</td> <td><b>1/yr (15 months)</b></td> </tr> <tr> <td>Pipelines Operating <math>\geq</math> 250 psig</td> <td><b>1/yr (15 months)</b></td> </tr> <tr> <td>Other Mains: CI, WI, copper, unprotected steel</td> <td><b>2/yr (7.5 months)</b></td> </tr> </table>							Business Districts ( <b>implement by 6/02/07</b> )	<b>1/yr (15 months)</b>	High Occupancy Structures	<b>1/yr (15 months)</b>	Pipelines Operating $\geq$ 250 psig	<b>1/yr (15 months)</b>	Other Mains: CI, WI, copper, unprotected steel	<b>2/yr (7.5 months)</b>
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High Occupancy Structures	<b>1/yr (15 months)</b>													
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Other Mains: CI, WI, copper, unprotected steel	<b>2/yr (7.5 months)</b>													
137.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs	X											
138.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred	X											
139.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected	X											
140.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions	X											
141.	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	X											
142.	480-93-188(5)	Gas Survey Records ( <b>Min 5 yrs</b> ) and at a minimum include required information listed under 480-93-188 (5) (a-f)	X											
143.	480-93-188(6)	Leak program - Self Audits	X											

**Utilities and Transportation Commission  
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144.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 SPW 703 & 707.3.2	X															
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table>							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)
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145.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706	X															
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr	7½ months																
4	4/yr	4½ months																
146.	192.603(b)	Patrolling Business District (4 per yr/4½ months)			X													
147.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	X															
148.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1)	X															
149.	192.603(b)	Tests for Reinstating Service Lines 192.725	X															
150.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727			X													
151.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X															
152.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X															
153.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745	X															
154.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	X															
155.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X															
156.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749			X													
157.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751			X													
158.	192.603(b)	Welding – Procedure 192.225(b)			X													
159.	192.603(b)	Welding – Welder Qualification 192.227/.229			X													
160.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2)			X													
161.	192.709	NDT Records (pipeline life) .243(f)			X													
162.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)			X													
163.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's)	X															

**Comments:**

Question 146:

The transmission line is not located near a business district.

Question 156:

All vaults are less than 200cf in size.

Questions 157 – 162:

No work has been done on the transmission line.

**Utilities and Transportation Commission  
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CORROSION CONTROL RECORDS			S	U	N/A	N/C
164.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
165.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) SPW 455.4.1.3	X			
166.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	X			
167.	192.491	Maps or Records .491(a)	X			
168.	192.491	Examination of Buried Pipe when exposed .459	X			
169.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
170.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X			
171.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	X			
172.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c)			X	
173.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c)			X	
174.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
175.	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			
176.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) SPW 455.4.3.1	X			
177.	192.491	Electrical Isolation (Including Casings) .467	X			
178.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
179.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	X			
180.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days SPW 463	X			
181.	480-93-110(5)(c)	Casing shorts cleared when practical SPW 463	X			
182.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months SPW 463	X			
183.	192.491	Interference Currents .473	X			
184.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)	X			
185.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	X			
186.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477			X	
187.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481	X			
188.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	X			
189.	480-93-110(3)	CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched)	X			

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**Comments:**

Questions 172 & 173:  
 There are no Critical and Non-critical interference bonds in Clark County.

Questions 186:  
 There is no history of internal pipe corrosion identified.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
190.	192.161	Supports and anchors		X		
191.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?				X
192.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables				X
193.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?				X
194.	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
195.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?				X
196.	480-93-015(1)	Odorization	X			
197.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
198.	192.179	Valve Protection from Tampering or Damage	X			
199.	192.455	Pipeline coatings meet requirements of 192.461 <i>(for buried pipelines installed after 7/31/71)</i>	X			
200.	192.463	Levels of cathodic protection	X			
201.	192.465	Rectifiers		X		
202.	192.467	CP - Electrical Isolation				X
203.	192.476	Systems designed to reduce internal corrosion				X
204.	192.479	Pipeline Components exposed to the atmosphere	X			
205.	192.481	Atmospheric Corrosion: monitoring	X			
206.	192.491	Test Stations – Sufficient Number .469	X			
207.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
208.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?				X
209.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?				X
210.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
211.	192.605	Knowledge of Operating Personnel	X			
212.	480-93-124	Pipeline markers	X			
213.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
214.	192.719	Pre-pressure Tested Pipe ( <b>Markings and Inventory</b> )	X			
215.	192.195	Overpressure protection designed and installed where required?	X			
216.	192.739/743	Pressure Limiting and Regulating Devices ( <b>Mechanical/Capacities</b> )	X			
217.	192.741	Telemetry, Recording Gauges	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
218.	192.751	Warning Signs	X			
219.	192.355	Customer meters and regulators. Protection from damage	X			
220.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	X			
221.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
222.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	X			
223.	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
224.	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
225.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? <b>Yes</b> <b>No</b>				
226.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?			X	
227.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?			X	
228.	192.745	Valve Maintenance (Transmission)	X			
229.	192.747	Valve Maintenance (Distribution)	X			

**Facility Sites Visited:**

Facility Type	Facility ID Number	Location
See Attached Field Notes for locations and details.		

**Comments:**

Questions 190:

The above grade high pressure line (250 psig), supported by concrete piers, at NE 11 Ave & NE Division in Camas, needs to be evaluated for corrosion cells between the supports and the pipe.

Questions 191-95:

There was no field construction work in progress to observe during this inspection.

Questions 201:

The rectifier at East Mill Plain and Missoula Ave is failing and need to be evaluated for possible replacement within the next year. The rectifier is critically located adjacent to about one mile of bare steel main.

Questions 203:

There is no history of internal pipe corrosion identified.

Questions 208 & 209:

There were no exposed pipe to field inspect casing and casing seals.

**Utilities and Transportation Commission**  
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**Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)**

<u>Number</u>	<u>Date</u>	<u>Subject</u>
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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230. .605(b)		<b>COMPRESSOR STATION PROCEDURES</b>	S	U	N/A	N/C
231.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
232.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			X	
233.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			X	
234.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
235.		(b) Tank must be protected according to NFPA #30			X	
236.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			X	
237.		• 50% of the upright side areas are permanently open, or			X	
238.		• It is an unattended field compressor station of 1000 hp or less			X	

**Comments:**  
 No Compressor Stations located in Clark County.

		<b>COMPRESSOR STATION O&amp;M RECORDS</b>	S	U	N/A	N/C
239.	.709	.731(a) Compressor Station Relief Devices (1 per yr/15 months)			X	
240.		.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)			X	
241.		.736(c) Compressor Stations – Detection and Alarms (Performance Test)			X	

**Comments:**  
 No Compressor Stations located in Clark County.

		<b>COMPRESSOR STATIONS INSPECTION (Field)</b>	S	U	N/A	N/C
		(Note: Facilities may be “Grandfathered”)				
242.	.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
243.		Door latch must open from inside without a key			X	
244.		Doors must swing outward			X	
245.	(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
246.		Each gate located within 200 ft of any compressor plant building must open outward			X	
247.		When occupied, the door must be opened from the inside without a key			X	
248.	(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			X	
249.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	

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### Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
250.	(b)	Do the liquid separators have a manual means of removing liquids?			X	
251.		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	
252.	.167 (a)	ESD system must:				
253.		- Discharge blowdown gas to a safe location			X	
254.		- Block and blow down the gas in the station			X	
255.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
256.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
257.		ESD system must be operable from at least two locations, each of which is:				
258.		- Outside the gas area of the station			X	
259.		- Not more than 500 feet from the limits of the station			X	
260.		- ESD switches near emergency exits?			X	
261.	(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	
262.	(c)	Are ESDs on platforms designed to actuate automatically by...				
263.		- For unattended compressor stations, when:				
264.		▪ The gas pressure equals MAOP plus 15%?			X	
265.		▪ An uncontrolled fire occurs on the platform?			X	
266.		- For compressor station in a building, when				
267.		▪ An uncontrolled fire occurs in the building?			X	
268.		▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to <b>NEC Class 1, Group D</b> is not a source of ignition)?			X	
269.	.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	
270.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
271.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
272.	(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	
273.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
274.	.173	Is each compressor station building adequately ventilated?			X	
275.	.457	Is all buried piping cathodically protected?			X	
276.	.481	Atmospheric corrosion of aboveground facilities			X	
277.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
278.		Are facility maps current/up-to-date?			X	
279.	.615	Emergency Plan for the station on site?			X	
280.	.619	Review pressure recording charts and/or SCADA			X	
281.	.707	Markers			X	
282.	.731	Overpressure protection – relief's or shutdowns			X	
283.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
284.		Is aboveground oil or gasoline storage tanks protected in accordance with <b>NFPA standard No. 30?</b>			X	



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## Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
285.	.736	Gas detection – location			X	

**Comments:**

No Compressor Stations located in Clark County.

