

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-110041		
Inspector Name & Submit Date	Dave Cullom – April 14, 2011		
Chief Eng Name & Review/Date	Joe Subsits, April 15, 2011		
Operator Information			
Name of Operator:	The City of Enumclaw	OP ID #:	4500
Name of Unit(s):	N/A		
Records Location:	2041 Railroad St, Enumclaw, WA 98022		
Date(s) of Last (unit) Inspection:	6-9-08 thru 6-13-2008	Inspection Date(s):	3/29-3/31/2011

Inspection Summary:

This was a standard inspection of the City of Enumclaw's gas distribution system. It involved several days of pre-field, records review, and field verification. The operator was well prepared for the inspection with the required leak surveys, map updates, OQ records, pressure monitoring, valve maintenance, marker surveys, odorant testing, public awareness, damage prevention, and other required tasks were performed as indicated in the O&M manual within the required timeframes. The OQ portion of the inspection went well with the operators performing the covered tasks with knowledge and confidence. They were aware of what abnormal operating conditions could arise and how to mitigate these potential safety hazards. There were a few items that were identified in the pre-field inspection relating to the venting of gas and a meter support issue, but they were immediately resolved by the operator.

HQ Address:	System/Unit Name & Address:	
2041 Railroad St Enumclaw, WA 98022	The City of Enumclaw 2041 Railroad St Enumclaw, WA 98022	
Co. Official: Ed Hawthorne	Phone No.: 360-825-5541	
Phone No.: 360-615-5787	Fax No.: 360-825-7232	
Fax No.: 360-825-7232	Emergency Phone No.: 253-350-2125	
Emergency Phone No.: 253-261-1124	360-825-3479	
Persons Interviewed	Title	Phone No.
Ed Hawthorne	Gas Manager	360-615-5787
Mark Van Wieringen	Gas Supervisor	360-825-5541
Chuck Speece	Gas System Operator	360-825-5541
Kyle Rohner	Gas System Operator	360-825-5541

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 checked="" type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	Spring 2008
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<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	2006 PJ
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S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

GAS SYSTEM OPERATIONS

Gas Supplier		Williams	
Services: Residential 4107 Commercial 401 Industrial 2 Other 0			
Number of reportable safety related conditions last year 2010-0 2009 - 0		Number of deferred leaks in system 2010-0 2009 - 0	
Number of <u>non-reportable</u> safety related conditions last year 2010-0 2009 - 0		Number of third party hits last year 2010 – 4 2009 – 10 (4 classified as other shovel nicks)	
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) No class 4 90.72 miles of main	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	At Auburn Enumclaw Hwy ~240 psig	250 psig	240
Town:		40-60 (60 in certain areas 196 th and Auburn/Enumclaw)	36
Other:			
Does the operator have any transmission pipelines?	No		
Compressor stations? Use Attachment 1.	No		

Pipe Specifications:

Year Installed (Range)	1957 to present	Pipe Diameters (Range)	½ to 6"
Material Type	PE and steel wrapped	Line Pipe Specification Used	Various
Mileage	90.72 miles of main	SMYS %	~ 7%

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** 4/14/2010

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:** No Transmission

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. <u>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.</u> Include operator contact information with all updates. **Notes – Not a transmission line **			X	

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REPORTING RECORDS			S	U	N/A	N/C
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 over 250 or a transmission line**			X	
3.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802) **None during this time period**			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 **None during this inspection time period**			X	
6.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports **None**			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; **None**			X	
9.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; **None**			X	
10.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; **None since 6-2008 except where a car hit 10-29-2008 where a house was evacuated**			X	
11.	480-93-200(1)(d)	The unintentional ignition of gas; **None**			X	
12.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; **None during this inspection time period**			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; **None during this inspection time period**			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; **None during this inspection time period**			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; **None during this inspection time period**			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; **None during this inspection time period**			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 **None during this inspection time period**			X	
19.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP **None during this inspection time period**			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			
30.	480-93-200(4)(j)	Line type;	X			

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REPORTING RECORDS			S	U	N/A	N/C
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 failure analysis of any incident or hazardous condition due to construction defects or material failure	X			
35.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year **Note – Was submitted**				
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) Other.	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. **Note – Enumclaw uses “equipment leaks” as defined by 191.3**	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:

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	X			
46.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? **NOTE - Enumclaw manual 4-0-2 shows the calculations**	X			
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? **NOTE - Each service uses a 1K4 form that track this information**	X			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
48.	480-93-013	OQ records for personnel performing New Construction covered tasks **CERC plus records**	X			
49.	192.225	Test Results to Qualify Welding Procedures - Appendix 4-I-9test, 4-I-1proc	X			
50.	192.227	Welder Qualification **Note – Reviewed Appendix 4-L-10 (2 tests every 6mths for Mark VanWeiringen**	X			
51.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months)	X			
52.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months) **Note - **	X			
53.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period **Note – All re-qualified within 1/Yr (NTE 15mths)**	X			
54.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)	X			
55.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 **Note - None **			X	
56.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains **Note - None**			X	
57.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
58.	192.241(a)	Visual Weld Inspector Training/Experience **Note – Mark VW (3/31/2009) by Ed Hawthorne **	X			
59.	192.243(b)(2)	Nondestructive Technician Qualification **Note – Not a transmission line **	X			
60.	192.243(c)	NDT procedures **Note – Not a transmission line **	X			
61.	192.243(f)	Total Number of Girth Welds **Note – Not a transmission line **	X			
62.	192.243(f)	Number of Welds Inspected by NDT **Note – Not a transmission line **	X			
63.	192.243(f)	Number of Welds Rejected **Note – Not a transmission line **	X			
64.	192.243(f)	Disposition of each Weld Rejected **Note – Not a transmission line **	X			
65.	192.303	Construction Specifications	X			
66.	192.325	Underground Clearance	X			
67.	192.327	Amount, location, cover of each size of pipe installed	X			
68.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length **Note – Not a transmission line **			X	
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: **Note – Not a transmission line **			X	
70.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; **Note – Not a transmission line **			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. **Note – Not a transmission line **			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 **Note – Not a transmission line **			X	
73.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; **Note – Not a transmission line **			X	
74.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. **Note – Not a transmission line **			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; **Note – Not a transmission line **			X	
76.	480-93-160(2)(g)	Welding specifications; and **Note – Not a transmission line **			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
77.	480-93-160(2)(h)	Bending procedures to be followed if needed. **Note – Not a transmission line **			X	
78.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS? **Note – Not a transmission line or over 20% SMYS **			X	
79.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) **Note – Pressure test report included required information**	X			
80.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? **Note – This condition has not occurred during this inspection time period **			X	
81.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule)	X			
82.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig **Note – No lowering of pipelines occur **			X	
83.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines \leq 60 psig **Note – No lowering of pipelines occur **			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	X			
85.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	X			
86.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09 **Note – modified EOv valve section and 7100-1.1update. Ed also reviewed OQ procedures to address AOCs to make sure they are being.	X			
87.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel **Note – Each truck has access to all maps and service order records	X			
88.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? **Note – Checked 1455 Battersby - Hospital and reviewed mapping update time stamp**	X			
89.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures **Note – Reviewed Gas Manager’s review of crew responding to regulator station hit **	X			
90.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures **Note – Even though 192.605c does not apply Enumclaw – Ed reviews the AOC form**			X	
91.	192.609	Class Location Study (If applicable) **Note – No transmission lines **			X	
92.	192.614	Damage Prevention (Operator Internal Performance Measure)				

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OPERATIONS and MAINTENANCE RECORDS		S	U	N/A	N/C
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) **Note – The City of Enumclaw performs locates and then digs. If the actual pipeline is more than 2 ft off the maps are updated When anyone digs near (within 50ft) of the high pressure line the City is on site. We also reviewed the locates for 2010 and of the 4 services damaged only 2 had locates**	X			
94.	Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? **Note – They do not contract out locates **			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? **Note – They do not contract out locates **			X	
96.	Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? **Note – Out of 425 locates only 1 was damaged after located was performed by a shovel**	X			
97.	Review operator locating and excavation <u>procedures</u> 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. **Note – We examined about 10 random locate records. We suggested they also store the locate time to eliminate any confusion about the locate time.**	X			
99.	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			
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? **Note – No follow-ups for this inspection time period, but they did on 3/4/08 after some construction near the pipeline. A leak was found **	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 X N	X			

Comments:

102.	Emergency Response Plans	S	U	N/A	N/C
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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 . **Note – Responded to multiple types of calls in the proper manner – Several records reviewed including CO calls and leaks found on customer piping and with appliances. The form needs to be corrected on the customer notification line, but Ed has agreed to fix it.**	X																													
104.	192.615(b)(1)	Location Specific Emergency Plan . **Note - These are in the O&M **	X																													
105.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training **Note – drills are conducted and the training is verified through the OQ process. Saw example from 9/27/2010**	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: **Note – They have identified several types of stakeholders (citizens, public officials, and excavators. They have a breakfast where the excavators get information. They use certified mail to make sure they are getting good coverage. The public officials are sent a letter and met with. A record is kept. They also mail out a supplemental emergency binder.**	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.		<table border="1"> <thead> <tr> <th align="center">Stakeholder Audience (LDC's)</th> <th align="center">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residence Along Local Distribution System</td> <td>Annual</td> </tr> <tr> <td>LDC Customers</td> <td>Twice annually</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> <tr> <th align="center">Stakeholder Audience (Transmission line operators)</th> <th align="center">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> <tr> <td>Residence Along Local Distribution System</td> <td>2 years</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> </tbody> </table>	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				
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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. **Note – Not enough Spanish speaking population to justify bilingual mailing**	X																													

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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. <u>For operators in existence on June 20, 2005</u> , 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)	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. **Note – No MMs**			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) **Note – No occurrences**			X	

Comments:

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) **Note – MAOP was established by a waiver or "special permit"***	X			
119.	480-93-015(1)	Odorization of Gas – Concentrations adequate **Note – checked 2009 and 2010**	X			
120.	480-93-015(2)	Monthly Odorant Sniff Testing **Note – checked 2009 and 2010**	X			
121.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements **Note – checked O&M too, but no low odorant instances noted**			X	
122.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) **Note – checked 2009, 2010, and 2011 Manufacturers service report**	X			
123.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) **Note – Checked 2009, 2010, 2011**	X			
124.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? **Note – Distribution Sign Survey**	X			
125.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on	X			
126.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? **Note – No uprate over 60 psig**			X	
127.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? **Note – Checked several record samples. They are graded and not deferred.**	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; **Note – None**	X			
129.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? **Note – None**	X			
130.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? **Note – Checked all leak records 2009**	X			

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131.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? **Note – None**			X	
132.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) **Note – The 13 items were looked at**	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)	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 **Note – Saw example of special leak survey prior to resurfacing at Battersby and Garrett St**	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	X			
138.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected **Note – None**			X	
139.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions **Note – None**			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	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 **Note – Looked at letter dated Jan 19th, 2010 and Feb 2nd 2011 from Ed to the PW director and the City Admin and the Mayor **	X			
143.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 **Note – None**			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			X	
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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) **Note – Once a year per Dave Lykken – Reviewed patrol and HOS 8/18/2010**	X			
146.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) **Note – Once a year per Dave Lykken – reviewed during inspection **	X			
147.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) **Note – Reviewed 2010**	X			
148.	192.603(b)	Tests for Reinstating Service Lines 192.725 **Note – Not reinstated**	X			
149.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 **Note – None**			X	
150.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 R-17 6/15/09 and 6/15/2010	X			

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151.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 **Note – Ed reviews capacity every year and when the hospital came online for instance**	X			
152.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 **Note – None**			X	
153.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 **Note – We reviewed the records for these for 2009 and 2010**	X			
154.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) **Note – We reviewed the records for these for 2009 and 2010**	X			
155.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 **Note – no vaults over 200cuft**			X	
156.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 **Note – They do training, but no gaseous atmosphere work is done**			X	
157.	192.603(b)	Welding – Procedure 192.225(b) **Note – Welders qualified to Appendix C**	X			
158.	192.603(b)	Welding – Welder Qualification 192.227/.229	X			
159.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) **Note – None**			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) **Note – None**			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) **Note – The CP was installed when the code went into effect**	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 **Note – We reviewed the 2010 exposed pipe condition reports**	X			
168.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
169.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) **Note – We reviewed the records and they had some low reads due to customer grounding to meter and a bond an isolation coupling but they remediated well within the 90 day time period and restarted the survey**	X			
170.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) **Note – They have 4 Rectifiers and the we looked at several records **	X			
171.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) **Notes – One at 1806 Railroad – a Tacoma water line. We checked the records for 2009 and 2010 **	X			
172.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) **None - **			X	

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
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) **Note – These were addressed in the settlement agreement. Reviewed 23 from order that had been replaced.**			X	
176.	192.491	Electrical Isolation (Including Casings) .467	X			
177.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months **Note – We reviewed the records for these for 2009 and 2010**	X			
178.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods **Note – We reviewed the records for these for 2009 and 2010 – They use a Current Mapper to check the casings without test leads**	X			
179.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days **Note – None**			X	
180.	480-93-110(5)(c)	Casing shorts cleared when practical			X	
181.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months			X	
182.	192.491	Interference Currents .473 **Note – We reviewed the records for these for 2009 and 2010**			X	
183.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)	X			
184.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	X			
185.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477	X			
186.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 **Note – We reviewed the records for these for 2009 and 2010. I also spot checked **	X			
187.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/485	X			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
188.	192.161	Supports and anchors ** Note – There was a service manifold that had a welded support that did not touch the ground. It was several inches too short and was not performing its intended purpose. The operator was made aware of this and fixed the issue before the inspection was completed. **	X			
189.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? **Note – No work of this type was being performed at the time of inspection**			X	
190.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables **Note – No work of this type was being performed at the time of inspection**			X	
191.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? **Note – No work of this type was being performed at the time of inspection**			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. **Note – No work of this type was being performed at the time of inspection**			X	

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
193.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified? **Note – No work of this type was being performed at the time of inspection**			X	
194.	480-93-015(1)	Odorization	X			
195.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel? **Note – We verified that the maps were being updated within the appropriate timeframe and that they are available to operations staff**	X			
196.	192.179	Valve Protection from Tampering or Damage **Note – All of the valves that we observed in the field were properly protected **	X			
197.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) **Note – No work of this type was being performed at the time of inspection**			X	
198.	192.463	Levels of cathodic protection **Note –We observed several cathodic protection tests and all of the tests had acceptable values for proper cathodic protection**	X			
199.	192.465	Rectifiers	X			
200.	192.467	CP - Electrical Isolation	X			
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? **Note – We were not able to view any exposed casing ends at the time of inspection**			X	
207.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? **Note – No work of this type was being performed at the time of inspection**			X	
208.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted **Note – Manuals and maps are available**	X			
209.	192.605	Knowledge of Operating Personnel **Note – The individuals that were evaluated during the OQ portion of the field inspection demonstrated the appropriate level of training and experience for the covered task observed.**	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) **Note – no pretested pipe was inspected**			X	
213.	192.195	Overpressure protection designed and installed where required?	X			
214.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			
215.	192.741	Telemetry, Recording Gauges	X			
216.	192.751	Warning Signs	X			
217.	192.355	Customer meters and regulators. Protection from damage ** Note – There was a service regulator that had its relief located very close to a foundation opening. The operator was made aware of this and fixed the issue before the inspection was completed. **	X			
218.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. **Note – No vaults were inspected during this inspection**			X	
219.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? ** Note – There was a service regulator that had its relief partially obstructed. The operator was made aware of this and fixed the issue before the inspection was completed. **	X			
220.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	X			
221.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches.			X	

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		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. **Note – No joint trench operations were being performed at the time of inspection. These are looked at during Design, Construction, and Testing (aka crew) inspections**				
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 **Note – No joint trench operations were being performed at the time of inspection. These are looked at during Design, Construction, and Testing (aka crew) inspections**			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? **Note – None per question 223**			X	
225.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? **Note – None per question 223**			X	
226.	192.745	Valve Maintenance (Transmission) **Note – Not currently classified as transmission**			X	
227.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location
Gate Station		Williams/Enumclaw Gate – Auburn Enumclaw Highway
Pressure Limiting Station		392 nd and Auburn Enumclaw Highway
Odorant Testing Location		Auburn Academy

Comments:

Chuck performed the odorizer injector and the rectifier testing. Kyle Rohner performed the odorant testing and Mark VanWieringen operated and adjusted the pressure control and relief devices.

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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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228.		.605(b)		COMPRESSOR STATION PROCEDURES				S	U	N/A	N/C
229.		.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service **Note – No Compressors**						X		
230.		.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units **Note – No Compressors**						X		
231.		.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement **Note – No Compressors**						X		
232.		.735(a)	Storage of excess flammable or combustible materials at a safe distance from the compressor buildings **Note – No Compressors**						X		
233.		(b)	Tank must be protected according to NFPA #30 **Note – No Compressors**						X		
234.		.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: **Note – No Compressors**						X		
235.			• 50% of the upright side areas are permanently open, or **Note – No Compressors**						X		
236.			• It is an unattended field compressor station of 1000 hp or less **Note – No Compressors**						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) **Note – No Compressors**				X
238.		.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months) **Note – No Compressors**				X
239.		.736(c)	Compressor Stations – Detection and Alarms (Performance Test) **Note – No Compressors**				X

Comments:

COMPRESSOR STATIONS INSPECTION (Field)				S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")							
240.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits **Note – No Compressors**				X
241.			Door latch must open from inside without a key **Note – No Compressors**				X
242.			Doors must swing outward **Note – No Compressors**				X
243.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit **Note – No Compressors**				X
244.			Each gate located within 200 ft of any compressor plant building must open outward **Note – No Compressors**				X

Attachment 1

Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
245.		When occupied, the door must be opened from the inside without a key **Note – No Compressors**			X	
246.	(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70? **Note – No Compressors**			X	
247.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors? **Note – No Compressors**			X	
248.	(b)	Do the liquid separators have a manual means of removing liquids? **Note – No Compressors**			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? **Note – No Compressors**			X	
250.	.167 (a)	ESD system must: **Note – No Compressors**				
251.		- Discharge blowdown gas to a safe location **Note – No Compressors**			X	
252.		- Block and blow down the gas in the station **Note – No Compressors**			X	
253.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers **Note – No Compressors**			X	
254.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage **Note – No Compressors**			X	
255.		ESD system must be operable from at least two locations, each of which is: **Note – No Compressors**				
256.		- Outside the gas area of the station **Note – No Compressors**			X	
257.		- Not more than 500 feet from the limits of the station **Note – No Compressors**			X	
258.		- ESD switches near emergency exits? **Note – No Compressors**			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? **Note – No Compressors**			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%? **Note – No Compressors**			X	
263.		▪ An uncontrolled fire occurs on the platform? **Note – No Compressors**			X	
264.		- For compressor station in a building, when				
265.		▪ An uncontrolled fire occurs in the building? **Note – No Compressors**			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)? **Note – No Compressors**			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. **Note – No Compressors**			X	
268.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown? **Note – No Compressors**			X	
269.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)? **Note – No Compressors**			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? **Note – No Compressors**			X	
271.	(e)	Are the mufflers equipped with vents to vent any trapped gas? **Note – No Compressors**			X	
272.	.173	Is each compressor station building adequately ventilated? **Note – No Compressors**			X	
273.	.457	Is all buried piping cathodically protected? **Note – No Compressors**			X	
274.	.481	Atmospheric corrosion of aboveground facilities **Note – No Compressors**			X	

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
275.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? **Note – No Compressors**			X	
276.		Are facility maps current/up-to-date? **Note – No Compressors**			X	
277.	.615	Emergency Plan for the station on site? **Note – No Compressors**			X	
278.	.619	Review pressure recording charts and/or SCADA **Note – No Compressors**			X	
279.	.707	Markers **Note – No Compressors**			X	
280.	.731	Overpressure protection – relief's or shutdowns **Note – No Compressors**			X	
281.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building? **Note – No Compressors**			X	
282.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30? **Note – No Compressors**			X	
283.	.736	Gas detection – location **Note – No Compressors**			X	

Comments: